



## **Health and Safety Policy Statement**

It is the stated policy of The Honourable Society of Gray's Inn (The Society) that we are committed to providing a safe environment to ensure the health, safety and welfare of everyone who is either visiting or working on our premises.

In particular, we undertake to:

- 1) Provide and maintain a safe place of work, safe systems of work and to provide and maintain suitable and safe work equipment for our employees.
- 2) Prevent accidents and causes of ill health which may affect our employees and visitors to The Society.
- 3) Ensure that our employees conduct their work with due regard for the health, safety and welfare of both themselves and others that may be affected by such work.
- 4) Meet the legal requirements of health and safety regulation as a minimum standard for all of our business activities and we also aim to exceed the requirements of health and safety guidance as part of our commitment to eliminate accidents and ill health.
- 5) Conduct risk assessments on all our work activities and to review and update these assessments regularly.
- 6) Continue to strive to improve our health and safety performance by means of regular review of risk assessments, accident and incident reports, audit (internal and external) reports, best practice and through compliance with our policies.
- 7) Provide sufficient resources, in terms of finance, time, training and personnel, to ensure that the health and safety arrangements contained within this policy can be implemented successfully.
- 8) Consult with our employees on matters affecting their health and safety and provide open and effective methods of communication.

Overall responsibility for health and safety within our organisation rests with the Under Treasurer. Day to day responsibilities are delegated as necessary but ultimately, responsibility rests with the Under Treasurer.

The Society Heads of Department have the responsibility to ensure that all regulations, policies and procedures that are pertinent to their area of responsibility are complied with and identification of specific responsibilities is made in the Arrangements section of this policy.

Health and safety performance however is not the sole responsibility of any one person as each employee is required to take all reasonable care to control risks faced by themselves or others who may be affected by their acts or omissions. The Society will always support people in pursuit of health and safety excellence.

Signed: Stephen Cartwright OBE, Under Treasurer

# Health and Safety Responsibilities

## Under Treasurer

Ultimate responsibility for health and safety within the Society rests with the Under Treasurer. The holder of this office will ensure that sufficient resources are made available for the implementation, development and sustainability of The Society's health and safety programme. The Under Treasurer will give equal weight to health and safety considerations when making business decisions as is given to other aspects of business management and will take an active interest in The Society's health and safety performance.

## Facilities Manager

The Facilities Manager has delegated responsibility from the Under Treasurer to act as Health and Safety Manager for The Society. The holder of this office is responsible for the implementation of a suitable health and safety management system for The Society and retains operational responsibility for health and safety matters.

## Heads of Department

The holders of these positions are directly responsible for the health and safety performance of the department under their control and will:

1. Ensure that this health and safety policy, supporting procedures and safe systems of work are fully implemented in their area of responsibility.
2. Ensure that adequate resources, in terms of time, personnel and finance are available to implement and manage the health and safety system within their department effectively.
3. Review health and safety performance of their department and will always strive to improve performance in health and safety matters with an overall ongoing aim of reducing the level of accidents, incidents and near misses.
4. Ensure that risk assessments are carried out for the work carried out in their area of responsibility and that this remains an ongoing process, with assessments undergoing regular review.
5. Make sure that the content of risk assessments are communicated to all those employees carrying out the work that the assessment covers and to make the assessments available for employee access at any time.
6. Ensure that all training needs are met in their area of responsibility and allocate resources to allow training to take place, including releasing employees from their normal tasks to enable them to attend training.
7. Report events that meet the requirements of a reportable incident under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR 2013) to the relevant enforcing authority. The actual reporting is delegated to the Health and Safety Manager but the Head of Department in each department is responsible to ensure that this takes place.

## The Honourable Society of Gray's Inn Organisational Chart

### **Heads of Departments cont.**

Heads of Departments are responsible, within their area of supervision, for the successful implementation and management of the health and safety arrangements and procedures formulated for The Society. To achieve these aims holders of these positions will:

1. Ensure that risk assessments for all tasks and work activity conducted in their area of supervision are complete, relevant and reviewed regularly.
2. Assist with the review health and safety arrangements to take into consideration the additional risks that may arise from the employment of vulnerable people including (but not limited to) young workers (those under 18 years of age), seasonal or temporary workers, disabled workers or pregnant workers. Risk assessments for work activities that may be conducted by these individuals will identify any specific limitations or arrangements required on a general or case by case basis as appropriate.
3. Identify training needs for staff and allocate resources to allow training to take place, including releasing staff from their tasks to enable them to attend training.
4. Through regular work place inspection and document review, ensure that the health and safety arrangements in place for their area of supervision are suitable and sufficient and that they are fully implemented and managed.
5. Allocate and utilise resources under their control for the purposes of controlling risks associated with work activities and following established Society systems, request additional resources from Senior Management where they are required.
6. Promote a safety culture in their workplace by always striving to set a good example for others to follow, actively encouraging the use of safe working practices and the active discouragement of unsafe working practices.
7. Provide and maintain routes of communication within their departments to facilitate the effective exchange of health and safety information through all levels of the organisation as appropriate.
8. Ensure accidents, incidents and near misses are reported in line with Society procedure. In conjunction with the Health and Safety Manager, review accident reports and statistics with the overall aim of identifying possible trends and recurrent causes and reducing occurrence of accidents. Assist with accident investigations as appropriate.

## **Employees**

All of our employees (the definition of which includes temporary and volunteers for the purposes of this policy) have a duty to take care for health and safety of themselves and others who may be affected by their acts or omissions and to comply with all Society health and safety policies, legislation, instructions and warning signs with regard to health and safety matters. Employees are encouraged to speak to their manager or supervisor if they have any health, safety or welfare concerns. In addition:

1. Employees must only use work tools and equipment for the purpose for which it was designed and where normal use of the equipment presents a foreseeable and significant risk, only use it if they have been trained and authorised to do so.
2. Employees must attend training deemed necessary by the employer and subsequently carry out their work following the methods described in the training they have received.
3. All employees must use any work related personal protective equipment (PPE) and respiratory protective equipment (RPE) provided for those tasks that require it and report any damaged or missing equipment to their manager as soon as possible.
4. Employees must report any known defects in their work equipment, particularly where it is safety critical, to their manager and the employee must not continue to use the piece of work equipment while it remains defective. The equipment must be rendered unusable by being locked off, removed from the work area or otherwise disabled until it is repaired or replaced.
5. All work-related accidents, injuries, dangerous occurrences, near misses or breaches of procedure must be reported to the employee's immediate supervisor or manager as soon as possible.

## **Health and Safety Committee**

The Society has a health and safety committee, the purpose of which is to encourage effective two-way communications through the organisation, to provide a forum for employee concerns or suggestions to be raised and to help to promote a good safety culture within The Society. Employee health and safety representatives are appointed from each Department to assist with the communication process and to act as a point of contact for the employees they represent.

The committee will meet four times a year and will be chaired by the Health and Safety Manager.

## **Source of Health and Safety Assistance**

The Society uses consultants to support the in-house health and safety provision. Some individuals within the Society have formal health and safety qualifications and consultant support is used as and when necessary, this is arranged through the Health and Safety Manager.

# Arrangements

The following section provides detail on how The Society manages the various aspects of our health and safety arrangements. In most cases further detail is given in the separate subject specific procedure, and where relevant these are referenced for further reading.

## Accident Management

The Society will make first aid provision as determined by the first aid risk assessment carried out for the site as a whole. Responsibility for ensuring this assessment is in place rests with the Health and Safety Manager and they will ensure systems are in place for the provision of first aid treatment and also for the reporting of incidents and accidents (RIDDOR 2013).

- Related procedures: Accident Management, First Aid
- Related documents: First Aid Risk Assessment, Accident Book, Accident Reports

## Adverse Weather

Poor weather can affect access to the Society by our employees and visitors and can also affect our work. Where adverse conditions exist, the Society will manage particularly cold, wet, windy or hot weather on a case by case and day by day basis but this will be based on the general principles set out in this procedure.

- Related procedure: Adverse Weather

## Asbestos

Asbestos is present in some of the Society premises. The Society holds a register of the location of all asbestos on the site, along with a plan for its management. Asbestos will be managed as directed by the management plan and any work carried out on material containing asbestos (whether confirmed as containing asbestos or suspected to be) will be covered by risk assessment, whether the work is done by our own employees or by contract. All material containing asbestos on Society premises will be clearly signed where it is accessible and where contact by people is likely.

All employees are asked to notify their immediate manager should any damage take place to any material marked as containing asbestos or if unmarked material that is known or suspected to contain asbestos is unexpectedly encountered.

- Related procedure: Asbestos Management
- Related documents: Asbestos Management Plan

## Chemicals

Potentially harmful chemicals may be used as part of the Society's undertaking, such as horticultural products and also some basic cleaning chemicals. The Society will hold material safety data sheets (MSDS) and carry out a Control of Substances Hazardous to Health (CoSHH) risk assessment for any chemical showing a hazard warning identification, for any substance that has a workplace exposure limit approved by the HSE, is a biological agent that is harmful to human health and for certain dusts.

- Related procedures: Hazardous Substances
- Related documents: CoSHH Assessments, Material Safety Data Sheets

## Confined Spaces

A confined space can include any space of an enclosed nature where there is a risk of death or serious injury from exposure to a hazardous substance or dangerous condition such as reduced oxygen availability. Confined spaces found on Society premises may include:

- Storage tanks
- Enclosed drains
- Sewers
- Ductwork
- Poorly ventilated rooms or voids e.g. roof spaces

Where a confined space exists and where there is a significant risk to the safety of anyone entering the confined space, entry by Society staff will only be permitted if the employee has received appropriate training and after a detailed risk assessment is carried out, control measures have been applied and where it is necessary to reduce risk, after a permit to work has been issued.

- Related procedures: Confined Spaces, Permit to Work
- Related documents: Risk assessments, permits to work

## Construction

The Society carries out a wide range of construction and maintenance projects on our properties, using our own employees and/ or contractors. All construction projects fall under the Construction (Design and Management) regulations and The Society will fulfil the duties imposed on them by these regulations, whether that be as a client, contractor or both, and will appoint suitable contractors to fulfil the other roles within CDM that are not filled by The Society. As there will be a wide range of projects undertaken, The Society's role will vary depending on the type and scale of project involved.

- Related procedure: Construction (Design and Management) - CDM

## Consultation with Employees

The Society recognises that we have a duty to consult with our employees on issues which may affect their health and safety whilst they are at work. We also recognise that consultation is a two-way process and is not limited solely to informing individuals of what, how, why and when for specific issues.

The Society has a safety committee system established, with attendance from all areas of the Society's business.

All employees are encouraged to raise health and safety concerns and questions with their manager or employee representative.

- Related documents: Society safety committee minutes

## Contractors

Contractors are used by The Society for specific tasks. Where contractors are to be used, we will ensure that:

1. Contractors will only be employed if they can demonstrate they are competent to carry out the work for which they have been contracted. This may be demonstrated by providing training and qualification certificates, evidence of membership of trade organisations or through having carried out previous work for the Society.
2. Contractors engaged to work for the Society will be expected to maintain at least the minimum standards of health and safety but strive to attain the highest standards.
3. Contractors provide risk assessments for their work and that these are provided prior to the work commencing.
4. We maintain vigilance and oversight of contractors where engaged, via The Society employee arranging the contract.

The specifics of how The Society will manage contractors are determined by the Society contractor selection procedures.

- Related procedure: Control of Contractors

## **COVID-19**

The Society is committed to implementing a strategy and associated set of revised management arrangements to help manage infection hazards and risks thereby preventing the spread of Coronavirus within our workplaces.

The Society is committed to providing a safe and healthy workplace for all our employees, members, visitors and others. To help ensure this, we have developed the following COVID-19 response:

All managers, supervisors, workers are responsible for the implementation of our policy and associated management arrangements, a combined effort will help contain the spread of the virus. As a responsible employer, and as an organisation we will:

- Continue to monitor our COVID-19 response and amend our policy and associated arrangements as necessary and in consultation with our workers.
- Provide up to date information from the likes of the Public Health England, the UK Government, the UK Health & Safety Executive and any other Authority or Body, including our Insurers.
- Display information on the signs and symptoms of COVID-19 and correct hand-washing techniques as well as general personal hygiene.
- Provide an Employer Representative (Dermot Doughty – Head of HR) who is easily identifiable and put in place a reporting system.
- Inform all workers of essential hygiene and respiratory etiquette.
- Ensure all social distancing requirements are observed.
- Adapt the workplace to facilitate social distancing.
- Keep a Contact / Visitor Log to help with contact tracing.
- Communicate all revised management arrangements, procedures and processes to our workforce.
- Develop a procedure to be followed in the event of someone showing symptoms of COVID-19 during work.
- Intensify cleaning regimes.

All managers, supervisors and workers will be consulted on an ongoing basis and feedback is encouraged on and concerns, issues or suggestions.

- Related procedure: COVID 19 Procedures and Management Arrangements

## **Display Screen Equipment (DSE)**

There are a significant number of employees working for The Society who are DSE users as defined by the Regulations. Where this applies, The Society will maintain user-completed risk assessments of display screen equipment for any employee who is classed as a DSE user. Those employees identified as DSE users are reminded that they are entitled to an eye test funded by the company.

- Related procedure: Display Screen Equipment
- Related documents: Display Screen Equipment Assessments



## Electrical Hazards

Electrical hazards arise on Society premises via the mains supply and via portable electrical equipment. The Society will take all steps to minimise such risks and we have a procedure giving specific details on how this is managed. As a minimum, the mains supply will be inspected and tested regularly and a portable appliance examination and testing (PAT) system will be in place for all portable tools and equipment.

- Related procedure: Electrical Safety
- Related documents: PAT records, mains test records

## Fire and Emergency

As required by the Regulatory Reform (Fire Safety) Order 2005, The Society will maintain a fire risk assessment for each of the various business premises. The Health and Safety Manager will ensure the assessments are reviewed at least annually and will have on-going plans and procedures in place to manage fire risks as advised by the risk assessment and by the Society's in-house fire safety procedures.

- Related procedure: Fire and Emergency
- Related documents: Fire Plan, Monthly Health and Safety Inspection, Fire Risk Assessments

## Health Surveillance

There are currently some activities undertaken within The Society which may necessitate health surveillance of our employees e.g. high noise levels, exposure to specific chemicals or skin irritants, prolonged exposure to hand held equipment emitting high levels of vibration and for those whose are classed as "night workers". The Society will initiate such surveillance determined as necessary by the risk assessments or legislative requirements.

- Related procedure: Occupational Health

## Working at Heights

Some of our employees carry out work that involves working at height. Working at height means work in any place where, if precautions were not taken, a person could fall down and injure themselves. In other words, that is if the person:

- Works above ground level.
- Could fall from an edge, raised area, ladder or other access equipment, through an opening or through a fragile surface.
- Could fall from ground level into an opening in a floor or hole in the ground.
- Related procedure: Working at Heights

## **Housekeeping and Maintenance**

Housekeeping and maintenance of equipment is very important in terms of controlling risk. All employees are encouraged to report defective equipment and arrangements will be made for repair or replacement. Systems are maintained to ensure that any equipment which requires routine servicing or maintenance is done so within the time schedule required.

- Related documents: Monthly Health and Safety Inspection sheets, service records

## **Water Hygiene**

The risk of exposure to legionella bacteria will be considered using a risk assessment process and The Society will use a contract service to carry out the risk assessments, identify any remedial works found to be necessary, carry out water sampling (if found to be necessary) and to provide advice on controlling the risk of exposure to legionella bacteria.

- Related procedure: Legionella

## **Lone Working**

The nature of the work that takes place on Society premises is such that our employees, or others working on our behalf, may be expected to work in isolated locations on jobs or tasks which can give rise to an increased risk to that person's health and safety because they are working alone. All employees will be requested to notify their manager or the Personnel Department if they prefer, if they have any medical conditions which may cause an increased risk to themselves if they are working alone at any time. This information will be used only to assess any increased risk or specific control measures that may be required.

- Related procedure: Lone Workers

## **Managing Visitors and Visitor Events**

The Society occasionally holds publically attended events and there are areas of the premises where public access is continual. The Society will manage safety for visitors whether they are attending a specific event or just passing through the site.

- Related procedure: Managing visitors and events

## **Manual Handling**

Manual handling is part of almost all work activities and The Society will take all reasonably practicable steps to minimise and control risks arising from this. This includes ensuring the risk assessment process considers manual handling, that risks are eliminated or at least reduced to the lowest level that is reasonably practicable and where risks do remain, that training is given to all employees who are at significant risk.

- Related procedure: Manual Handling Operations

## **New and expectant mothers**

Should an employee become pregnant they are encouraged to report this to their line manager or directly to the Personnel Department and reasonable arrangements will be made, if any change to the work or work routine is found to be necessary, on a case by case basis to minimise work-related risks to the mother and unborn child. Additional assessment of the risks associated with specific tasks or job roles will be undertaken where a pregnancy is reported.

- Related documents: Risk assessments, Society policy regarding pregnancy

## **Noise at Work**

Some tasks carried by Society employees generate a noise level above the two action levels, defined as 80 dB(A) and 85 dB(A) by the Control of Noise at Work Regulations. Where this is the case, The Society will reduce noise levels to the lowest level that is reasonably practicable and will take steps to mitigate the noise risk by removing or changing the task, by using engineering measures or other controls where possible and where this is not sufficient to eliminate or reduce noise to safe levels, risk reduction will be via the provision of suitable hearing protection.

Health surveillance (audiometry) will be provided for any employees regularly working in a noise-risk area.

- Related procedure: Noise at Work
- Related documents: Noise Assessments

## **Permit to Work**

Certain tasks require the use of a permit to work system and this will be implemented on a job by job basis. Tasks for which a permit may be required are:

- Hot work
- Entry into confined spaces
- Work on live electrics
- Some work at height

A permit will only be issued where it will be beneficial in reducing risk and only when a significant risk remains despite existing control measures having been applied first.

- Related procedure: Permit to Work
- Related documents: Work Permits

## **Personal Protective Equipment (PPE) and Outdoor Clothing**

Specific jobs or tasks may require the use of PPE, including the use of clothing to protect the wearer against bad weather. Where a need for PPE is indicated as being required by the risk assessment for that job role or task, The Society will provide all necessary PPE and this will be at no cost to the employee.

When users are given an item of PPE they will be given specific instruction in its safe use and maintenance.

- Related procedure: Personal Protective Equipment

## **Risk Assessment**

Risk assessment is at the heart of how The Society controls risks faced by our employees and visitors. The risk assessment process will be overseen and managed by the Health and Safety Manager.

All jobs that present a significant and foreseeable risk to health and safety are covered by a risk assessment and these assessments will be reviewed regularly.

Following the assessments, The Society will take all reasonably practicable steps to eliminate or at least reduce the risks present to the lowest level that is reasonably achievable. The Society will maintain a procedure giving detail on how the risk assessments will be managed.

- Related procedure: Risk Assessment
- Related documents: Task or job role based risk assessments

## **Safety signs and signals**

Safety signs and signals will be used to warn of a significant hazard that exists even where other control measures have been implemented and to provide information to people, particularly in an emergency. The display of signs as a single control measure will not be sufficient when considering how to control a hazard but they may be used in conjunction with other control measures.

- Related procedure: Safety signs and signals

## **Stress in the Workplace**

Stress can arise in the workplace by a number of different causes, including time pressures, pressures of work, an over-reaching or over-expectation of ability by either an individual or their manager, or via issues such as ill health, non-work-related family issues, etc.

The Society encourages all employees who may be concerned that stress is affecting their health or their performance at work to report this to their manager. Should any employee be uncomfortable with this they can also approach Director of Finance.

The employee's manager, with assistance from Personnel if required, will review the case and wherever possible will agree steps with the employee to help implement any necessary changes or manage the work flow.

Similarly, should an employee be threatened, or feel threatened, by any other member of staff or member of the public during the course of their work, either physically or verbally, they are encouraged to report this and The Society will investigate and take appropriate measures.

- Related Procedure: Occupational Health

## Training

The Society recognises that health and safety training has a hugely beneficial role to play within the organisation and is necessary to allow individuals to perform the tasks expected of them. The Society will arrange for provision of training as necessary (e.g. where it is legally required, when it arises from risk assessments, when it is identified by job reviews, etc.) and will provide all such training during working hours where possible. The Society, via the Health and Safety Manager, will maintain records of all training attended and will arrange refresher training where appropriate.

New employee training (including volunteers) is a component of this and The Society will maintain an induction training programme with a procedure detailing how this is managed.

- Related Procedure: Training and New Employee Induction
- Related document: Training records and certificates

## Tree Management

The Society will manage our trees in such a way so as to minimise risks. However, this is done with the knowledge that trees are living things that can and do fail (whether that be partially or completely) sometimes without warning and despite a robust tree inspection system being in place.

Trees are regarded as an essential part of The Society premises and the decision to manage or fell trees on the grounds of safety will be a balance between maintaining safety and maintenance of a valuable natural amenity. Trees will be preserved if it is possible to do so and may not be felled unless there is a significant and immediate threat to safety.

Additional controls will be considered for visitor areas, during or after times of poor weather and for areas or trees that the tree inspection system highlights as being higher risk.

- Related procedure: Tree Management and Remedial Works
- Related documents: Tree Inspection Records, Tree Management Plan

## Vibration at Work

Some of the machinery and equipment used by Society employees can generate vibration at levels that may be harmful to human health. Where employees are found to be at risk, The Society will take steps to remove the risk by trying to eliminate the task as a first step. If this is not possible, we will mitigate the risk by implementing engineering controls or other mechanical means where it is reasonably practicable to do so. Where this is not sufficient and a risk remains, job rotation and time limiting may be used to reduce exposure to the lowest level that is reasonably practicable and at least below the exposure limit value of  $5\text{m/s}^2 \text{A}(8)$ .

Health surveillance will be provided for any employees regularly meeting or exceeding the vibration action level of  $2.5\text{m/s}^2 \text{A}(8)$ . Health surveillance will be managed by the Health and Safety Manager.

- Related procedure: Vibration at Work
- Related documents: Risk assessments, health surveillance records

## **Work Place and Work Equipment**

The Society will provide and maintain a safe workplace and to this end we will undertake a regular inspection programme in our workplaces to monitor that the workplace, and the equipment used in it, remains in a safe condition.

Work equipment provided for use by the Society for our employees will be suitable for the task, will be made to a recognised quality standard (CE marked usually) and will be maintained in line with manufacturers recommendations at least.

The Society will maintain a procedure to ensure that any contractors or employees are not inadvertently exposed to hazardous substances by work undertaken by contractors.

- Related procedures: Provision and Use of Work Equipment, Work Environment, Asbestos
- Related documents: Health and Safety Inspection Records

## **Young people**

The Society may employ young people (for the purposes of this policy, young people are those aged under 18 years old). The Society will consider any additional risks that these people may face over and above the risks associated with the task or job role itself. Young people may be at additional risk because of their lack of experience of work places, being unaware of existing or potential risks, their lack of maturity, their undeveloped physical ability or an unwillingness to speak up if they are unsure of something or against their more established colleagues even if they think the work place is unsafe or if they see someone doing something against procedure.

- Related documents: Task based risk assessments, Personnel Young Person's risk assessment.