



Committee: PEOPLE AND ORGANISATIONAL DEVELOPMENT COMMITTEE

Date: THURSDAY, 10TH OCTOBER 2024

Venue: LANCASTER TOWN HALL

Time: 6.00 P.M.

A G E N D A

1. **Apologies for absence**

2. **Declarations of Interest**

To receive declarations by Councillors of interests in respect of items on this Agenda.

Councillors are reminded that, in accordance with the Localism Act 2011, they are required to declare any disclosable pecuniary interests which have not already been declared in the Council's Register of Interests. (It is a criminal offence not to declare a disclosable pecuniary interest either in the Register or at the meeting).

Whilst not a legal requirement, in accordance with Council Procedure Rule 9 and in the interests of clarity and transparency, Councillors should declare any disclosable pecuniary interests which they have already declared in the Register, at this point in the meeting.

In accordance with Part B Section 2 of the Code Of Conduct, Councillors are required to declare the existence and nature of any other interests as defined in paragraphs 8(1) or 9(2) of the Code of Conduct.

3. **Minutes**

To receive as a correct record the Minutes of meeting held on 18th July 2024 (previously circulated).

4. **Items of Urgent Business authorised by the Chair**

5. **HR Policy Development and Review** (Pages 3 - 27)

Report of HR Policy and Strategy Lead.

6. **Health and Safety Policy Development Review** (Pages 28 - 64)

Report of Senior Corporate Health and Safety Manager.

ADMINISTRATIVE ARRANGEMENTS

(i) Membership

Councillors Prof Chris Harris (Chair), Jason Wood (Vice-Chair), Mandy Bannon, Paul Hart, Caroline Jackson, Margaret Pattison and Paul Stubbins

(ii) Substitute Membership

Councillors Matthew Black, Alan Greenwell, Sue Penney, Sam Riches and Sue Tyldesley

(iii) Queries regarding this Agenda

Please contact Stephen Metcalfe, Democratic Support - email sjmetcalfe@lancaster.gov.uk.

(iv) Changes to Membership, substitutions or apologies

Please contact Democratic Support email democraticsupport@lancaster.gov.uk.

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PEOPLE AND ORGANISATIONAL DEVELOPMENT COMMITTEE**HR POLICY DEVELOPMENT AND REVIEW****10 October 2024****Report of the HR Policy and Strategy Lead****PURPOSE OF REPORT**

To enable the Committee to consider and approve the introduction of revised HR Policies which fall into the category of Standby, Callout and Overtime, Social Media and Mobile Phones and Smoking and Substance Misuse.

This report is public.

RECOMMENDATIONS

That the draft policies appended to this report are considered by the committee and approved.

1.0 Introduction

- 1.1 The council has undertaken a phase five review of HR Policies which fall into the category of Standby, Callout and Overtime, Social Media and Mobile Phones and Smoking and Substance Misuse which have required updating for some time.
- 1.2 The policy review continues to concentrate on standardising format and branding of all the HR policies; bringing them in line with the branding selected to produce the employee handbook. This phase, there has been a focus on consolidation, and sensibly grouping together relevant policies to reduce the overall number of HR policies going forward.
- 1.3 The policy review also concentrates on simplifying, consolidating and shortening policies where possible, so that they are easier to follow and digest for employees, trade unions and managers. Each policy makes clear the scope, the responsibilities of each party and the process to be followed and any rights and/or entitlements of employees.
- 1.4 It is considered that a lot of information currently in these policies would be better served in guidance documents to ensure that the policy is focused on the fundamentals of principles, entitlements and process. It is the intention that each of these policies will be introduced alongside a suite of supporting documents provided to both managers and employees to ensure they each feel equipped and prepared to engage with the processes.
- 1.5 The policies are appended to this report, as well as a policy amendments tracker which focuses specifically on amendments to the relevant policy.

2.0 Standby, Callout and Overtime

- 2.1 The Standby and Callout policy had not been reviewed since 2017.

- 2.2 The rules in relation to overtime have previously sat in the flexi-time policy, and these will now be included within a new Standby, Callout and Overtime policy as these are all instances of additional payments to colleagues and we feel they sit better together.
- 2.3 There have been no changes to the pay in respect of overtime; the changes are to emphasise the process on overtime, to ensure that employees have the approval and authority to complete the overtime in advance of it being worked.
- 2.4 There are no immediate changes to the rate of pay for Standby payments, however from April 2025 when the new budget is set for the financial year, the proposal is that these figures are linked to the real living wage. This is consistent with the approach of many other local authorities, and it will then increase as it is updated on 1st April each year.
- 2.5 There has been some simplification to the system of home-based callout payments. Firstly, in relation to how "shift" is defined, so it is clear which day the callout falls on (and therefore what pay a colleague is entitled to), but also to the minimum callout payment. Previously either 30+minutes work or 3 individual calls would trigger a minimum callout payment of 2 hours. This has been simplified so that work exceeding 30 minutes will incur the 2-hour minimum, and work below 30 minutes or above 2 hours will be paid according to the actual time spent.

3.0 Social Media and Mobile Phones

- 3.1 We previously had separate Social Media (last reviewed in 2012) and Mobile Phone (last reviewed in 2008) policies. We have proposed to consolidate them and to ensure that the policies are up to date regarding LCC's expectations of social media and mobile phone usage; particularly due to the prevalence in the use of social media both as a professional tool and a social tool.
- 3.2 There has not been a great deal of change, and much of the existing policies remain; save as to delete outdated references and to be clear about how breaches will be dealt with (with a focus on de-escalating minor issues and dealing with them informally).
- 3.3 The social media aspects of the policy are focused on assuring colleagues that LCC respects their right to a private life, and their right to express themselves outside of work as they please, but to also encourage mindfulness around the content of such posts. The policy recommends that colleagues distance themselves from LCC by only naming LCC as their employer on a professional networking site such as LinkedIn to ensure that there is separation between professional and personal life. This protects employees as well as LCC as it makes it less likely that there can be a connection between anything they post online and their workplace.
- 3.4 LCC is mindful that it is particularly challenging to balance opposing protected viewpoints and that posts on social media can cause offence (even if they are not intended to). It is becoming more common that people will make reports to employers about its employees' posts online, and so these guidelines are set out to encourage sensible use of personal social media, to avoid LCC needing to consider any action. This would only ever be necessary if there was an *actual* impact on LCC, but we feel it is important to set the appropriate standards of behaviour online (even in a colleague's personal time).
- 3.5 We have removed the expectation that employees delete the contact details of business contacts made during employment from personal social networking accounts. It is not only unlikely they would have their contact details stored on social media as it is not a

means of communicating via their contact details, but if colleagues have a friendship outside of work with business contacts and both parties are comfortable with that, we respect the right for them to communicate after termination.

- 3.6 It has been necessary to introduce “other communication channels” which have become more widely used since these policies were last reviewed. LCC promotes the use of instant messaging to contact employees to discuss work, however we discourage the use of WhatsApp as a means of professional communication and will take the opportunity following the publishing of this policy to remind line managers that WhatsApp is not endorsed to discuss work matters during work hours.
- 3.7 Following discussion at the JCC meeting, it was recognised that the focus of the expectations on the reporting of social media was more focused on reporting the misuse of social media in general, rather than acknowledging that our own colleagues may be targeted or attacked on social media. Accordingly, the following revision has been introduced at paragraph 5.5: Colleagues are encouraged to report any misuse of social media to their line manager, especially where anything on social media has been posted about them. If colleagues are suffering any form of abuse on social media, it is important that this is reported to the relevant authorities, but where there is any connection with the workplace, colleagues are encouraged to share this so that LCC can support them.

4.0 Smoking and Substance Misuse

- 4.1 The Smoke Free and Substance Misuse policies were previously independent from one another. The Smoke Free policy was last updated in 2013, and the Substance Misuse policy was last updated in 2017. We consider that as they cover very similar subject matter, and an expectation to refrain from consuming substances on LCC sites, they sat more sensibly in one policy.
- 4.2 Again, there have not been many changes to either of the existing policies, save as to make minor updates i.e. to include the use of “vapes” (albeit that was perhaps already covered by e-cigarettes). There are two key changes to be aware of:
- 4.3 We have removed the 2-hour paid leave previously offered to attend a group meeting designed to aide stopping smoking. This was a local group which has long since been disbanded, but moreover there was no evidence that these appointments were ever attended (i.e. no requests for this type of leave), and we do not offer any paid leave for any other routine appointments.
- 4.4 We have reserved the right to conduct searches for alcohol or drugs on the premises. An employee can of course refuse consent to a search, but any failure to consent may be used in any subsequent disciplinary case against the employee. Following initial consultation with the Trade Union Working Group, best practice search parameters have been included within the policy to ensure that searches (where considered necessary and the employee consents) are conducted safely, respectfully and according to the approach suggested by the Working Group.
- 4.5 Following the discussion at the JCC meeting, the support services have been included (per the policy amendment tracker) to include more up to date and local support services.

5.0 Options

- 5.1 The options available to the Committee are to approve the revised policies as drafted, to approve the policies with amendments, or not to approve the policies.

5.2 However, if substantial changes in respect of any Policy are proposed at the People and OD Committee meeting, it may be appropriate for consideration of that Policy to be deferred to a future meeting to enable Officers to consider the proposed amendment in more detail and to consult further with the trade unions.

6.0 Conclusions

6.1 Members are asked to consider and accept the Officer recommendations set out above in respect of the draft policies appended to this report.

**CONCLUSION OF IMPACT ASSESSMENT
(including Health & Safety, Equality & Diversity, Human Rights, Community Safety, Sustainability and Rural Proofing):**

Please see associated Equality Impact Assessment in respect of the proposed policies. There is no notable impact however I would recommend wider understanding in line managers regarding the protection of beliefs to ensure they feel equipped to manage any conflicts posted on social media.

LEGAL IMPLICATIONS

There are no legal implications, save for compliance with legal requirements to implement and update policies.

FINANCIAL IMPLICATIONS

There are increased entitlements to leave with a slight financial impact for days' pay not worked, but rather than this being an additional "cost" this will be dealt with by an absorption of work in that employees' absence.

OTHER RESOURCE IMPLICATIONS, such as Human Resources, Information Services, Property, Open Spaces:

Chief Officers and their delegates, managers and HR have significant roles to play in these procedures. It would be recommended that as many managers as possible are upskilled in mediation and investigation so that more lower-level managers are able to be utilised.

SECTION 151 OFFICER'S COMMENTS

The Section 151 Officer has been consulted and has no comments to add.

MONITORING OFFICER'S COMMENTS

The Monitoring Officer has been consulted and has no comments to add.

BACKGROUND PAPERS

Policies and policy amendment tracker are appended.

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HR Policy Amendments Tracker

Policy Section Number (new number)	Existing/New Section	Section Heading	Amendment/addition Notes
Standby, Callout and Overtime			
N/A	N/A	Branding	Policy re branded to new format.
N/A	N/A	Generic Layout	Layout follows new format. Scope, Purpose, Roles & Responsibilities followed by the substantive provisions.
5.5 and 5.6	Existing	Home based callout	There has been some simplification to the system of home-based callout payments. Firstly, in relation to how "shift" is defined, so it is clear which day the callout falls on (and therefore what pay a colleague is entitled to), but also to the minimum callout payment. Previously either 30+minutes work or 3 individual calls would trigger a minimum callout payment of 2 hours. This has been simplified so that work exceeding 30 minutes will incur the 2-hour minimum, and work below 30 minutes or above 2 hours will be paid according to the actual time spent.
6	New	Overtime	Including Overtime as part of the existing standby and callout policy as another related process/policy concerning additional payments to colleagues for additional work performed. We feel it sits more sensibly here than with flexi time (as flexi time is distinct from overtime).
6.3	New	Overtime	Due to recent casework, an emphasis on ensuring that overtime is first approved by a line manager and is not worked before authorisation is granted.
<i>Future proposed change</i>			<p>From April 2025 when the new budget is set for the financial year, the proposal is that these figures are linked to the real living wage as follows:</p> <p>Weekly Rate 50% of 1 week's pay at real living wage*</p> <p>Day Rate 2.7 x real living wage hourly rate</p> <p>*updated 1st April each year and can be found at https://www.livingwage.org.uk</p> <p>The proposal is essentially to link the standby rates to the real living wage (currently £12 per hour) so that they will automatically increase year on year. Based on the current rate of pay, this would equate to £222 per week (currently £160) and £32.40 per day (currently £22.86). From the limited information received from other Local Authorities around what they offer, this is in line with their current payments.</p>
Social Media and Mobile Phones			
N/A	N/A	Branding	Policy re branded to new format.
N/A	N/A	Generic Layout	Layout follows new format. Scope, Purpose, Roles & Responsibilities followed by the substantive provisions.

N/A	N/A	N/A	Consolidation of existing social media and mobile phone policy – to cover all communication in one HR policy
N/A	Deleted clause 6.1.3 of existing Social Media Policy		We have removed the expectation that employees delete the contact details of business contacts made during employment from personal social networking accounts. It is not only unlike they would have their contact details stored on social media as it is not a means of communicating via their contact details, but if colleagues have a friendship outside of work with business contacts and both parties are comfortable with that, we respect the right for them to communicate after termination.
N/A	7		We have removed the monitoring part of the policy as this is covered in the relevant IT policies which cover monitoring. This ensures that monitoring is updated consistently, and we are not duplicating information across policies owned by different teams.
5.5	New	Social media expectations	New inclusion following JCC feedback: Colleagues are encouraged to report any misuse of social media to their line manager, especially where anything on social media has been posted about them. If colleagues are suffering any form of abuse on social media, it is important that this is reported to the relevant authorities, but where there is any connection with the workplace, colleagues are encouraged to share this so that LCC can support them.
7	New	Breaches	The policy has a new heading “breaches” to ensure that colleagues are made aware that breaches of the policy could be dealt with as a disciplinary matter. There is however a continued focus on de-escalation and ensuring that minor issues are dealt with informally, which the policy captures.
	Deleted clause 3 of existing mobile phone policy	Paying for personal calls	The mobile policy was very outdated, referring to tariffs and personal use of company mobile phones. We have removed a lot of these references, and only where company mobiles are used to incur premium charges will there be any attempt at recouping these costs from colleagues.
Smoking and Substance Misuse			
N/A	N/A	Branding	Policy introduced with branding to match new format.
N/A	N/A	Generic Layout	Layout follows new format. Scope, Purpose, Roles & Responsibilities followed by the entitlements and procedure to be followed.
5.5 and 5.6	New	Searches	<p>Inclusion of right to search as follows:</p> <p>5.5 We reserve the right to conduct searches for alcohol or drugs on our premises, including, but not limited to, searches of lockers, filing cabinets and desks, bags, clothing and packages. This would only be in circumstances where there was a strong suspicion (likely prompted by a report that a colleague has been seen with drugs or alcohol on work premises, and/or that alcohol or substance misuse is affecting the employee’s ability to work or putting other colleagues or the public at risk of harm). Anything found as a result of a search will be confiscated and action may be taken under the Disciplinary Policy, if you are an employee of LCC. Any refusal to comply with a search may also be considered under the Disciplinary Policy.</p> <p>5.6 If an employee agrees to the search, they will always be informed of the reason for the search and LCC will ensure that the employee’s privacy is prioritised i.e. this will take place in a private room, with a witness present. If a physical search is necessary, this will be performed by a member of the same biological sex. If it is considered that a physical search is necessary, a line manager will first consider if this is appropriate for LCC to handle, or if it is more appropriate to contact the police. It will always be necessary to contact the police if the search would require the removal of any</p>

			<p>clothing (other than a jacket). If the search involves the employee's personal property, the employee will be asked to remove/empty the contents to ensure that LCC has limited handling of any personal property. A log will be kept of the search, and the log itself will also be confidential. Employees are reminded that they are always free to refuse consent to a search, but in circumstances where there is a strong suspicion that an employee has drugs or alcohol in their possession, LCC may take this into account during any subsequent disciplinary procedure.</p>
Previous 6.1	Support available to employees		<p>We are proposing to withdraw the right to 2 hours paid leave to attend a smoking cessation consultation with Lancaster Smoking Cessation Service. This group no longer operates and there is no evidence that this type of leave has ever been applied for or utilised. We do not offer any paid leave for routine appointments and recommend removing this as inconsistent (despite it being well intentioned, it feels outdated).</p>
New Support Services			<ul style="list-style-type: none"> • The Well Community: https://www.thewellcommunities.co.uk/ • Red Rose Recovery (Lancaster): https://redroserecovery.org.uk/events/connect-lancaster/ • Inspire / Change Grow Live: https://www.changegrowlive.org/service-search-results?postal_code=LA1%204UL&distance=10&service_type%5B9%5D=9 • Smokefree Lancashire: https://www.nhs.uk/services/service-directory/smokefree-lancashire/N11032105?gsdServiceId=1837



Standby, Callout and Overtime Policy

1. Who does this policy apply to?

- 1.1 These arrangements apply to all Council staff covered by NJC terms and conditions. The Chief Executive and Chief Officers are included in these provisions, except in relation to overtime payments which only apply to employees at or below SCP 28 (grade 9).

2. What is the purpose of this policy?

- 2.1 This policy also provides the Council's stance in respect of overtime and overtime pay.

3. What roles do the employee, management, the Council and HR play in this policy?

3.1 Employee Responsibilities

- To be fully prepared to respond to a call-out and be ready to attend work as soon as possible;
- To report to the line manager any sickness or emergencies that prevent an employee from being ready and able to attend a call-out during standby;
- To accurately report to the line manager work undertaken during a call-out;
- To ensure that forms to request overtime are completed fully and are approved prior to working overtime hours.

3.2 Management Responsibilities

- To ensure that there are sufficient staff on Standby and Callout rotas to ensure that the same individuals are not repeatedly relied upon to undertake these duties. Standby and Callout rotas should therefore be periodically reviewed.
- To ensure that employees are protected from the possible effects of extreme tiredness or fatigue.
- To ensure that any requests for overtime hours are properly checked and signed off on *before* they are worked.

3.3 Council Responsibilities

- To ensure that this policy is at all times compliant with our health and safety responsibilities and that this is reflected in appropriate manager guidance available to line managers whose direct reports are required to be on Standby and attend callouts.
- To ensure compliance with the National Minimum Wage.

3.4 HR responsibilities

- To support managers with the implementation of this policy.

4. Standby

- 4.1 Where an employee is required to be available to be called out or called upon to undertake specific work activities that cannot be carried out in normal operating hours, a Standby payment will be made for the duration of the period that they are required to be available.
- 4.2 An employee on Standby is required to be contactable and is required to be fit to travel and carry out their duties throughout the duration of the standby period.
- 4.3 LCC recognises that time spent on Standby disrupts employees' lives outside of work, and therefore a standard rate of pay will be paid to employees required to be on Standby as follows:

Weekly Rate	£160.00*
Day Rate	£22.8571

*Subject to periodic review

Please note this also includes standby payments for DEIO & SEO cover, although call out payments for these activities are linked to specific spot salaries

- 4.4 The rate for Standby duty during Bank Holidays will be the same as for other working days. Employees who are required to be on Standby to cover a Bank Holiday, but are not called out to work, will however be granted a lieu day in recognition of the disruption caused by being on Standby for the duration of a public holiday.

5. Callout

- 5.1 Callout is where an employee is called out to undertake work while on Standby and involves the person physically attending an incident or place of work.

Pay

- 5.2 A minimum of 2 hours Callout payment will be made for any Callout, regardless of whether the Callout takes less than 2 hours to complete. However, multiple Callouts within a 2-hour period will only generate one minimum 2-hour payment with any excess over the 2 hours being paid based on the additional time spent on the Callout.
- 5.3 Callout payments are paid at the following rates:

	Monday-Saturday	Monday-Saturday 12am-6am	Sunday - all day	Bank Holidays – all Day (plus a lieu day)
Rate	Time and a half	Double	Double	Double

- 5.4 The above arrangements applies to all employees, irrespective of their grade or hours worked in a working week.

Home-Based Callout

- 5.5 When an employee is called upon to undertake work while on Standby, which does not involve them physically attending their place of work or an incident but can be carried out from home (e.g. by telephone); this is considered a Home-Based Callout.
- 5.6 If an employee on Standby is required to undertake one or more home-based callouts per shift, where working time exceeds 30 minutes, they will be remunerated in accordance with usual Callout arrangements i.e. for a minimum of two hours work. For working time, which is less than 30 minutes, or more than two hours employees will be remunerated for the actual time worked.
- 5.6 A shift, during the week is the period from the end of one working day to the start of the next working day or until midnight if on a Friday. A shift, on a weekend, would normally consist of the 24 hours covering either Saturday or Sunday.

6. Overtime

Process

- 6.1 Overtime hours are any hours worked by an employee in excess of those stated in their individual contracts of employment. Employees can only claim overtime if they are at or below SCP 28 (grade 9), unless in exceptional circumstances approved in advance by a Chief Officer.
- 6.2 Employees may be asked to work overtime, as necessitated by the needs of the service including weekends, on public holidays or at other times outside normal hours of work. LCC will give as much notice as possible in the event that overtime is deemed necessary.
- 6.3 Employees who wish to work overtime should first obtain authorisation from their line manager. Overtime should never be carried out without prior approval from the relevant line manager.
- 6.4 All employees who complete overtime must fill out an Overtime Additional Hours Claim Form. A description of the authorised duties completed in overtime should also be detailed in full. The employee's line manager and relevant Chief Officer or delegated officer (if they are the same person only one signature is required) must authorise the form before it is submitted to payroll for payment.

Pay

- 6.5 Payment for overtime worked will be made in accordance with the NJC National Agreement on Pay and Conditions of Service. Where pay rates are increased for overtime hours, the increase will take effect once the equivalent full-time hours per week have been worked.
- 6.6 Part-time employees will continue to be paid at their normal rate of pay for any overtime hours worked up to the contractual full-time hours per week. Any hours worked in excess of this limit will attract an enhanced rate of pay as follows:
- (a) Monday to Saturday – time and a half;
 - (b) Sundays and Public and Extra Statutory Holidays – double time (min 2 hours)

7. When will this policy be reviewed?

- 7.1 This policy will be reviewed every two years or earlier in the event of changes in legislation.

Document Control:

Version no.	Effective Date	Reason	Review due
1.0	...	New policy including Overtime	Dec 2026



Social Media and Mobile Phone Policy

1. Who does this policy apply to?

- 1.1 This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns.

2. What is the purpose of this policy?

- 2.1 The aim of this policy is to ensure that LCC have set the proper expectations for use of personal and work mobile phones in the workplace and for staff use of social media and other communication channels. This is an HR Policy, but it should be read in conjunction with the policies located on the ICT pages of the intranet covering acceptable use of ICT equipment and the Social Media policy. LCC acknowledges that the use of personal mobile phones will sometimes be necessary during work time (not including breaks/lunches/flexitime) due to emergencies. LCC also acknowledges the positives associated with staff use of social media and other communication channels, but that both professional and personal use of social media could present risks to the individual and the Council and it is important to protect against those risks by being transparent around LCC's expectations.

3. What roles do the employee, management, the Council and HR play in this policy?

3.1 Employee Responsibilities

- To avoid making any social media communications that could damage the interests or reputation of LCC.
- Make it clear in social media posts, or on your personal profile, that you are speaking on your own behalf by writing in the first person.
- Ensure that your professional social media profile(s) are consistent with the professional image you present to clients and colleagues.
- Be respectful of others when making any statement on social media and be aware that you are personally responsible for all communications published on the internet for anyone to see.
- Co-operation with any investigation related to a suspected breach of this policy.
- To remove any social media post that is considered to be a breach of this policy.
- To report a work mobile phone lost or stolen to the line manager and/or police as appropriate. Employees should also call the ICT service desk if the mobile is lost between 08:00am-18:00pm on a weekday to ensure the number can be suspended. Outside of these hours, employees should contact the relevant network provider to suspend the number and the ICT Service Desk must be made aware the following weekday.

3.2 Management Responsibilities

- Set a clear example for direct reports by following the expectations set out within this policy.
- To follow-up any reports of misuse of social media or mobile phones and refer to HR if this cannot be dealt with informally.

- ❑ Be available for direct reports who are conscious about the appropriateness of anything they post and give sensible guidance about whether or not it would be proper to share online.
- ❑ To be mindful of any anomalies in work mobile phone bills and to escalate any serious breaches of this policy.

3.3 Council Responsibilities

- ❑ To ensure there is a consistent approach to dealing with breaches of this policy.
- ❑ The Council will at all times be aware of its legislative responsibilities.
- ❑ The Council will ensure that this policy is revisited every two years or earlier in case of legal changes.

3.4 HR responsibilities

- ❑ To support each service with reported breaches of this policy which cannot be resolved informally and to provide advice and guidance on this policy.

4. Mobile Phones

Council Mobile Phones

- 4.1 The Council's mobile phones are issued for business purposes only. They must be used responsibly and appropriately at all times and diligent care should be taken of them.
- 4.2 Work mobiles should only be used for emergency personal calls or texts during working hours, where no other means of communication are available. Any anomalies will be checked when reviewing phone bills. If it is found that any work phones are being used for non-emergency personal calls and texts, it may be necessary to make deductions from employee wages (if there is any monetary loss caused).
- 4.2 Mobile phones, including the data stored on them, remain the property of the Council.
- 4.3 Mobile phones should be set up with a PIN code to prevent unauthorised usage in case the phone is ever lost or stolen. This PIN code should not be written on the phone or its case. Employees should call the ICT service desk if they need any support in creating a PIN for their handset.

Personal Mobile Phones

- 4.4 LCC understands that limited use of personal mobile phones may be necessary during working hours to deal with emergencies. Save for in an emergency, it is expected that all personal use of mobile phones is reserved for authorised breaks, lunches and flexitime. Any use of personal mobile phones which has an impact on productivity may be dealt with as a breach of this policy.

5. Social Media

Expectations

- 5.1 Except for during breaks, lunches, and flexitime, use of personal social media is not allowed during working hours or with our computers, networks and other IT resources and communication systems.
- 5.2 Other than on a professional networking platform (such as LinkedIn), it is not recommended that you list LCC as your employer on your social media profiles. This is to ensure that your personal views are not connected with LCC, and to distance your personal from your professional life. LCC respects that everybody is entitled to express themselves on social media platforms, but we must all be sensible about the things we write about on social media and consider the wider impact this could have.
- 5.4 You must not use social media to:

- (a) Defame or disparage LCC, its staff or any third party;
- (b) harass, bully, or discriminate against staff or third parties;
- (c) make false or misleading statements;
- (d) impersonate colleagues or third parties;
- (e) express opinions on our behalf via social media;
- (f) comment on matters which are confidential to LCC.

5.5 Colleagues are encouraged to report any misuse of social media to their line manager, especially where anything on social media has been posted about them. If colleagues are suffering any form of abuse on social media, it is important that this is reported to the relevant authorities, but where there is any connection with the workplace, colleagues are encouraged to share this so that LCC can support them.

6. Other Communication Channels

6.1 LCC recommends the use of MS Teams to instantly message other members of staff as an alternative to email. Colleagues are reminded that whilst this is a more “social” way to connect with colleagues, this is still a professional platform and any messages sent using MS Teams should remain professional at all times. LCC does not endorse the use of WhatsApp to communicate with colleagues during work hours.

7. Breaches

7.1 Any breaches of this policy will be considered in line with the LCC Disciplinary Policy. Where breaches are minor and can be dealt with informally, this should always be the line manager’s first consideration, however serious breaches could call for any of the sanctions set out in the Disciplinary Policy i.e. up to and including dismissal.

8. When will this policy be reviewed?

8.1 This policy will be reviewed every two years or earlier in case of changes in legislation.

Document Control:

Version no.	Effective Date	Reason	Review due
1.0	...	Updated Social Media and Mobile Phone policies and combined them moving forwards.	Dec 2026

FAQS

I am entitled to a personal life outside of work; am I not free to post what I like online?

LCC acknowledges that every employee has the right to a private life. This policy is concerned with social media posts which are in some way harmful either to LCC directly, as an organisation itself or offence caused to an employee, or indirectly through offence caused to a third party but who reports a matter directly to us. A balanced approach will always be taken to perceived breaches of this policy when a social media post is made outside of work and is made on the employees own behalf.



Smoking and Substance Misuse Policy

1. Who does this policy apply to?

- 1.1 This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns.

2. What is the purpose of this policy?

- 2.1 LCC is committed to protecting the health, safety and welfare of all those who work with us by providing a safe place of work. This policy sets out LCC's approach to smoking and substance misuse. All our workplaces are smoke-free per the Health Act 2006. All staff and visitors therefore have the right to a smoke-free environment. This also includes ensuring that all staff are fit to conduct their jobs safely and effectively in an environment free from alcohol and drug misuse.

3. What roles do the employee, management, the Council and HR play in this policy?

3.1 Employee Responsibilities

- To only smoke outside in designated areas during authorised breaks, lunches, or using flexitime and to dispose of cigarette butts and other litter appropriately whenever working or representing the Council.
- All employees have a duty and a responsibility to co-operate with managers to ensure compliance and to actively promote a smoke-free workplace.
- All employees have a duty to maintain their own health and safety and that of any others who they might affect by smoking/consuming other substances.
- If you are concerned about second hand smoke due to your work location, to share this with your line manager to appropriately consider your health and safety.
- To notify your line manager if you are taking any prescription or over the counter medication which may have an adverse effect on your ability to conduct your role.
- If you notice a change in a colleague's pattern of behaviour you should encourage them to seek help through their line manager or HR.
- If you suspect that a colleague has a problem with substance misuse, you should encourage them to seek help and to raise their concerns with their manager.

3.2 Management Responsibilities

- All managers are responsible for promoting and monitoring a smoke-free working environment.
- In conjunction with HR, to make referrals to Occupational Health to support employees trying to overcome addiction.
- To encourage staff who have an alcohol or drug-related problem to seek help, in confidence.

3.3 Council Responsibilities

- ❑ To ensure that staff who have an alcohol or drug-related problem affecting their work are dealt with sympathetically, fairly and consistently.
- ❑ To ensure that any information staff provide about their health is processed per GDPR.

3.4 HR responsibilities

- ❑ To provide support and guidance to line managers on this policy.

4. Smoking

- 4.1 Smoking is not allowed anywhere in our workplaces or on any Council grounds. This includes areas that are outside but that from part of the Council's premises.
- 4.2 The ban on smoking applies to *everything* that can be smoked and includes, but is not limited to, cigarettes, e-cigarettes (vapes) pipes (including water pipes such as shisha and hookah pipes), cigars and herbal cigarettes.
- 4.3 Anyone using a Council vehicle, whether as a driver or as a passenger, must ensure that the vehicle remains smoke-free. To the extent that a colleague, during working hours, is being transported in another colleague's personal vehicle, it is also the expectation that the vehicle stays smoke-free.

5. Substance misuse

- 5.1 We recognise that some of our staff may become dependent on alcohol or drugs. We also recognise that such dependencies can be successfully treated. We wish to promote a culture which understands and is sympathetic to the problems associated with alcohol and drug misuse in which staff with dependency problems are encouraged to seek help and are supported. However, we cannot accept staff arriving at work under the influence of alcohol or drugs, or whose ability to work is impaired in any way by reason of the consumption of alcohol or drugs, or who consume alcohol or drugs (other than prescribed or over the counter medication) on our premises.
- 5.2 Staff are expected to arrive at work fit to conduct their job and to be able to perform their duties safely without any limitations due to the use or affect-effects of alcohol or drugs.
- 5.3 Employees are encouraged to bring any substance misuse problems to the attention of their manager and or HR so that proper support can be given in the workplace and an occupational health referral be organised. Employees are also encouraged to seek specialist help available from their GP and other local agencies (the details of some are included below).
- 5.3 Drink-driving laws and drug-driving laws should be followed at all times. Convictions for drink-driving or drug-driving offence may harm LCC's reputation and, if your job requires you to drive, you may be unable to continue to do your job. Committing a drink-driving or drug-driving offence while working for us or outside working hours (if driving is an essential requirement of your role) may lead to action under our Disciplinary Procedure.
- 5.4 Only in exceptional circumstances, with the prior approval of a Chief Officer will consumption of alcohol during work time or a work event be permissible. Otherwise, the strict expectation is that you should not drink alcohol during the workday, at lunch time or at work-based meetings or events.
- 5.5 We reserve the right to conduct searches for alcohol or drugs on our premises, including, but not limited to, searches of lockers, filing cabinets and desks, bags, clothing and packages. This would only be in circumstances where there was a strong suspicion (likely prompted by a report that a colleague has been seen with drugs or alcohol on work premises, and/or that alcohol or substance misuse is affecting the employee's ability to work or putting other colleagues or the public at risk of harm). Anything found

as a result of a search will be confiscated and action may be taken under the Disciplinary Policy, if you are an employee of LCC. Any refusal to comply with a search may also be considered under the Disciplinary Policy.

- 5.6 If an employee agrees to the search, they will always be informed of the reason for the search and LCC will ensure that the employee's privacy is prioritised i.e. this will take place in a private room, with a witness present. If a physical search is necessary, this will be performed by a member of the same biological sex. If it is considered that a physical search is necessary, a line manager will first consider if this is appropriate for LCC to handle, or if it is more appropriate to contact the police. It will always be necessary to contact the police if the search would require the removal of any clothing (other than a jacket). If the search involves the employee's personal property, the employee will be asked to remove/empty the contents to ensure that LCC has limited handling of any personal property. A log will be kept of the search, and the log itself will also be confidential. Employees are reminded that they are always free to refuse consent to a search, but in circumstances where there is a strong suspicion that an employee has drugs or alcohol in their possession, LCC may take this into account during any subsequent disciplinary procedure.
- 5.6 We aim to ensure that the confidentiality of any member of staff experiencing alcohol or drug-related problems is kept appropriately. However, it needs to be recognised that, in supporting staff, some degree of information sharing is likely to be necessary.

6. Breaches

- 6.1 Any breaches of this policy will be considered in line with the LCC Disciplinary Policy. Where breaches are minor and can be dealt with informally, this should always be the line manager's first consideration, however serious breaches could call for any of the sanctions set out in the Disciplinary Policy i.e. up to and including dismissal.

7. Support

- 7.1 The Council recognises that smoking and use of other substances can be an addiction and aims to provide a supportive environment for those wishing to overcome addiction.
- 7.2 Employees who wish to give up smoking or other substances can request a referral to Occupational Health who can provide information and further advice.
- 7.3 Upon being made aware, the Council will support employees who are misusing a substance or consider themselves at risk of misusing a substance by:
- ❑ Responding appropriately to any employee who discloses that they are misusing a substance or consider themselves at risk of abusing a substance.
 - ❑ Discussing with the employee how the Council can provide assistance, including access to existing provisions, such as Occupational Health and counselling.
 - ❑ Offering temporary or permanent changes to working times and patterns, if organisationally possible and if the change would help the employee.
 - ❑ Offering access to the full provision of leave types for appointments; including those with doctors or counsellors.

Support Services Available:
<p>The Well Community</p> <p>https://www.thewellcommunities.co.uk/</p>
<p>Red Rose Recovery (Lancaster)</p> <p>https://redroserecovery.org.uk/events/connect-lancaster/</p>
<p>Alcoholics Anonymous (Great Britain)</p> <p>National helpline 0800 9177 650</p> <p>E-mail help@alcoholics-anonymous.org.uk</p> <p>Website www.alcoholics-anonymous.org.uk</p>
<p>Inspire/Change Grow Live</p> <p>Find a service near you Change Grow Live</p>
<p>Smokefree Lancashire</p> <p>https://www.nhs.uk/services/service-directory/smokefree-lancashire/N11032105?gsdServiceId=1837</p>
<p>Drinkline</p> <p>Helpline 0800 9178282</p> <p>Website www.drinkaware.co.uk</p>
<p>Talk To Frank</p> <p>Tel 0800 776600</p> <p>Website www.talktofrank.com</p>
<p>Narcotics Anonymous UK</p> <p>National Helpline 0300 9991212</p> <p>Website www.ukna.org</p>
<p>Cocaine Anonymous</p> <p>Helpline 0800 6120225</p> <p>Website www.cauk.org.uk</p>

Adfam National
Helpline 020 75537640
Website www.adfam.org.uk

8. When will this policy be reviewed?

8.1 This policy will be reviewed every two years or earlier in the event of changes in legislation.

Document Control:

Version no.	Effective Date	Reason	Review due
1.0	...	New Policy combining the Smoke Free and Substance Misuse Policies	Dec 2026



Lancaster City Council's Equality Impact Assessment Guidance and Form

What is an equality impact assessment?

An equality impact assessment is a way of understanding the impact that a new way of doing things might have on members of our community, in particular people from protected groups. This could be a new service, practice, policy, strategy, project or decision.

Protected groups include age, disability, faith, religion or belief, gender (including marriage, pregnancy and maternity), gender reassignment, race and sexual orientation (including Civil Partnership).

Please note: the impact on rural communities and people on low incomes must also to be considered.

Why do I need to carry out an equality impact assessment?

Part of the council's core purpose is to *'provide a range of customer focused services and offer value for money and meet the needs of people who live, work and visit the district' and to 'maintain a cohesive community by ensuring we understanding the needs of our communities and provide equality of access to our services and employment opportunities'*.

It is therefore important that we collect and use information about our community to help us to understand how service changes and decisions might impact on the local community.

Our corporate *Ethos* makes it clear that in our stewardship role the council has a responsibility for *'ensuring the social, economic and environmental wellbeing of the local area'* and that in terms of social justice that *'the values of local government are founded on equality and meeting community needs'*.

Therefore we should consider how everything we do will impact on the communities that we serve. This should lead to more informed decision making, more customer focussed, cost effective, efficient services for local people.

When delivering services and employment, the council has a general equality duty to consider the need to:

- Eliminate unlawful discrimination, harassment, victimisation or other unlawful conduct prohibited by the Act
- Advance equality of opportunity between people who share a protected characteristic and those who do not
- Foster good relations between people who share a protected characteristic and those who do not.

How do I carry out an equality impact assessment?

A simple form has been developed to assist services with carrying out equality impact assessments.

The form provides a consistent approach to equality impact assessment, however, it is more important that we consider how everything we do will impact on the local community and that action is taken to mitigate impact. The form provides a way of recording this.

The council's 'getting to know our communities' data will help services to assess potential impact on protected groups. This provides both local and national statistics and is available on the Elsie equality and diversity page (via HR).

All councils have to produce similar information, therefore it may be useful to do a web search rather than starting from scratch.

An example of a completed form is also available on the Elsie equality and diversity page (via HR).

When do I need to carry out equality impact assessment?

Equality impact assessment should take place when considering doing something in a new way.

For example:

- A change in a current service or introduction of a new service
- The review of a current policy/strategy or the development of a new policy/strategy
- The start of a new project or when making a decision.

A decision making flow chart is available on the Elsie equality and diversity page (via HR).

An equality impact assessment form will need to be completed as an appendix to decision making committee reports eg Cabinet, Council.

Please note: the outcomes of your equality impact assessment should be used to inform your reports.

Please refer to the report writing guidelines on Elsie or contact democratic services for advice on this.

Who should carry out equality impact assessment?

An equality impact assessment should be carried out by the officer leading on above examples.

Who can I contact for support and guidance?

Equality impact assessment support is available from the HR and Organisational Development Team.

Equality impact assessment form

An equality impact assessment should take place when considering doing something in a new way.

Please submit your completed form as an appendix to your committee reports for monitoring and publishing purposes to ['report clearance'](#) (please refer to report writing guidance).

Please keep your answers brief and to the point. Consideration needs to be reasonable and proportionate.

Please also remember that this will be a public document – do not use jargon or abbreviations.

Section 1: Details

Service	People and Policy
Title and brief description (if required)	Revision of Social Media, Mobile Phones, Standby and Callout, Overtime, Substance Misuse and Smoke Free policies
New or existing	Existing policies amalgamated
Author/officer lead	Laura Collins, HR Policy and Strategy Lead
Date	02.10.2024

Does this affect staff, customers or other members of the public?

Yes Please complete the rest of the equality form.

No Please return the equality form as above.

Section 2: Summary

What is the purpose, aims and objectives?

Smoke Free and Substance Misuse – to combine, update and consolidate relevant information together. The policies were very outdated. The only new introduction has been to reserve the right to conduct (non-physical) searches for suspected alcohol or drugs.

Social Media and Mobile Phones – to combine, update and consolidate relevant information together. The social media aspects outline more up to date expectations of how to use social media and to encourage colleagues to distance their views from LCC.

Standby Callout and Overtime – to combine, update and consolidate relevant paid work together. The policies were very outdated, and the overtime policy previously sat with flexitime. Some of the definitions needed to be changed to make standby and callout easier to understand.

Who is intended to benefit and how?

1. Existing members of staff and applicants– improving and developing our employment offer, ensuring our policies continue to be in line with legislation and best practice.
2. Line Managers – providing a policy framework which is compliant and relevant and can assist them in managing people processes.
3. Lancaster City Council – attracting and retaining talent in our workforce ensuring that policies link to other wider underpinning strategies such as the people plan and fair work charter aims.

Section 3: Assessing impact

Is there any potential or evidence that this will or could:		
• Affect people from any protected group differently to others?	Yes*	No
• Discriminate unlawfully against any protected group?	Yes*	No
• Affect the relations between protected groups and others?	Yes	No
• Encourage protected groups to participate in activities if participation is disproportionately low (won't always be applicable)?	Yes	No
• Prevent the council from achieving the aims of its' Equality and Diversity Policy?	Yes	No

If yes, please provide more detail of potential impact and evidence including:	
<ul style="list-style-type: none"> - A brief description of what information you have and from where eg getting to know our communities data, service use monitoring, views of those affected ie discussions or consultation results? - What does this tell you ie negative or positive affect? 	
Age including older and younger people and children	N/A
Disability	N/A
Faith, religion or belief	<p>*All HR policies constitute a “provision, criterion or practice” which, even if applied equally to all members of staff, could disproportionately impact those with protected characteristics and therefore amount to discrimination for the purposes of the Equality Act.</p> <p>With Social Media and Mobile Phone policy in mind, there is likely a conflict between employees’ who have different protected beliefs (who may wish to express those on social media which is a human right), but this is why the guidelines are necessary; to ensure that anything posted on social media is respectful and mindful of other people’s beliefs and to try and put distance between personal social media posts and LCC. It should not be the role of LCC to police what is said on social media in a personal capacity, but where colleagues or third parties introduce any disputes or views they may have found offensive into the workplace, we will need to address this.</p>
Gender	

including marriage, pregnancy and maternity	
Gender reassignment	N/A
Race	N/A
Sexual orientation Including Civic Partnership	N/A
Rural communities	N/A
People on low incomes	N/A

Section 4: Next steps

Do you need any more information/evidence eg statistics, consultation? If so, how do you plan to address this?

No

How have you taken/will you take the potential impact and evidence into account?

N/A

How do you plan to monitor the impact and effectiveness of this change or decision?

Policies to be reviewed in line with regular cycle of review every two years.

Thank you for completing this equality impact assessment form, please submit your completed form as an appendix to your committee reports for monitoring and publishing purposes to ['report clearance'](#) (please refer to report writing guidance).

PEOPLE AND ORGANISATIONAL DEVELOPMENT COMMITTEE**HEALTH & SAFETY POLICY DEVELOPMENT REVIEW****Thursday 10th October 2024****Report of Senior Corporate Health and Safety Manager****PURPOSE OF REPORT**

To enable the Committee to consider and approve a range of amendments and additions to existing policies and procedures.

This report is public.

RECOMMENDATIONS

- (1) That, following consideration of the draft health & safety policies by the Joint Consultative Committee on 30th September 2024, the Committee now approve the new policies referred to in this report.

1.0 Introduction

- 1.1 Following the Health and Safety Corporate Review and appointment of the Senior Corporate Health and Safety Manager, there is an ongoing action to renew all Health and Safety Policies to ensure they are up to date with current Legislation and have sufficient guidance for staff members with specific responsibilities included.

- 1.2 As part of this the proposed following health and safety policies are required:

SG16 COSHH Policy
SG17 Manual Handling Policy
SG18 Noise and Vibration Policy
SG33 Personal Protective Equipment Policy
SG37 Working at Height Policy

- 1.3 These new and updated policies are presented to the Committee for their consideration.

2.0 SG16 COSHH Policy

- 2.1 Lancaster City Council last reviewed and updated the previous version of the COSHH Policy in August 2018. The original policy was insufficient in terms of the guidance provided on COSHH as a whole and did not include any responsibilities or training information.

The new version of SG16 (re-written to replace existing versions) also reflects the change in process for COSHH risk assessments being recorded within the My Compliance system across all departments and clearly outlines definitions, responsibilities and training.

2.2 JCC Comments

Trade Union colleagues reviewed the policies and raised some questions, all questions were addressed, and some minor wording amendments were made within the policies. No further questions or comments were raised by the Joint Consultative Committee.

3.0 SG17 Manual Handling Policy

3.1 Lancaster City Council last reviewed and updated the previous version of the Manual Handling Policy in August 2018. The original policy posed more of a guidance document oppose to a policy. The policy included outdated information on the weight limits individuals could 'carry/lift/move'.

The new version of SG17 (re-written to replace existing versions) now includes all information required for a suitable policy and focuses on individual capabilities whilst including clear definitions, roles and responsibilities, the TILE method and more recent process chart for manual handling operations.

3.2 JCC Comments

Trade Union colleagues reviewed the policies and raised some questions, all questions were addressed, and some minor wording amendments were made within the policies. No further questions or comments were raised by the Joint Consultative Committee.

4.0 SG18 Noise and Vibration Policy

4.1 Lancaster City Council last reviewed and updated the previous version of the Noise and Vibration Policy in August 2018. The original policy was more of a guidance document not defining roles, monitoring or review and lacked information of health surveillance required.

The new version of SG18 (re-written to replace existing versions) now clearly includes responsibilities, definitions, training, health surveillance and monitoring.

4.2 JCC Comments

No questions or comments were raised by the Joint Consultative Committee.

5.0 SG33 Personal Protective Equipment Policy

5.1 Lancaster City Council last reviewed and updated the previous version of the Personal Protective Equipment (PPE) Policy in October 2018. The original policy was insufficient in terms of the guidance provided on PPE with no references to Respiratory Protective Equipment (RPE) and the definitions were vague whilst little information provided on responsibilities.

The new version of SG33 (re-written to replace existing versions) now includes Respiratory Protective Equipment (RPE) and the requirements, definitions, responsibilities, testing, monitoring and review.

5.2 JCC Comments

No questions or comments were raised by the Joint Consultative Committee.

6.0 SG37 Working at Height Policy

6.1 Lancaster City Council last reviewed and updated the previous version of the Working at Height Policy in March 2019. The original policy was insufficient in terms of definitions, responsibilities, training, monitoring and review with more of a focus of controls which would normally be expected in a risk assessment.

The new version of SG37 (re-written to replace existing versions) and now includes clear definitions, responsibilities are outlined, risk assessment along with suitable information on controls along with sections on training and how the Council will monitor audit and review such works and the policy.

6.2 JCC Comments

Trade Union colleagues reviewed the policies and raised some questions, all questions were addressed, and some minor wording amendments were made within the policies. No further questions or comments were raised by the Joint Consultative Committee.

7.0 Options

7.1 The options available to the Committee are to approve the new and revised policies as drafted, to approve the policies with amendments, or not to approve the policies.

However, if substantial changes in respect of any Policy are proposed at the People and Organisational Development Committee meeting, it may be appropriate for consideration of that Policy to be deferred to a future meeting to enable Officers to consider the proposed amendment in more detail and to consult further with the trade unions.

8.0 Conclusions

8.1 Members are asked to consider and accept the Officer recommendations set out above in respect of the new drafted policy documents appended to this report.

<p>RELATIONSHIP TO POLICY FRAMEWORK</p> <p>The Council is committed to the health safety and welfare of all employees and members of the community we support, and it is considered that the amended policies will raise the standard of the current health and safety practices across the organisation.</p>
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<p>CONCLUSION OF IMPACT ASSESSMENT</p>

<p>FINANCIAL IMPLICATIONS</p> <p>There are no direct financial implications arising from this report. Any further training requirements can be met from existing budgets. As to be expected with any health and safety issue, future implications could occur and these will be reported at the relevant time as appropriate.</p>
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SECTION 151 OFFICER'S COMMENTS

The s151 Officer has been consulted and has no further comments to add.

LEGAL IMPLICATIONS

The proposed new and updated policies will assist in compliance against the Health and Safety at Work etc. Act 1974, the Management of Health and Safety Regulations 1999, The Reporting of Injuries, Disease and Dangerous Occurrence Regulations 2013 (RIDDOR), The COSHH Regulations 2002 (as amended), The Manual Handling Operations Regulations 1992 (as amended), The Lifting Operations and Lifting Equipment Regulations (LOLER) 1998, The Control of Noise at Work Regulations 2005, Personal Protective Equipment at Work Regulations 1992, Working at Height Regulations 2005

MONITORING OFFICER'S COMMENTS

The Monitoring Officer has been consulted and can confirm that adoption of these policies is a function of this Committee.

BACKGROUND PAPERS

Policies Documents for Review

Contact Officer: Alex Kinch

Telephone: 01524 582083

E-mail: akinch@lancaster.gov.uk

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1.0 INTRODUCTION

The COSHH Regulations 2002 (as amended) place duties on the company to identify substances that have the potential to cause harm or ill health and to ensure that any such risks are removed, reduced and controlled. To ensure staff have the necessary information, training and supervision to comply with this legislation.

Hazardous substances come in a variety of forms such as:

- Chemicals
- Fumes
- Dusts
- Vapours
- Biological Agents (bacteria, viruses, body fluids)
- Gases (mists)

Purpose: The purpose of this policy is to set out the measures required by the Trust to ensure compliance with the Control of Substance Hazardous to Health Regulations 2002.

Scope: This policy applies to all staff and other persons working on Lancaster City Council premises and within the community undertaking work on behalf of the organisation.

Compliance: This policy complies with all relevant regulations and other legislation as detailed in the *Compliance with Regulations & Legislation Statement*.

2.0 GENERAL STATEMENT

Lancaster City Council recognises that exposure to chemicals or other hazardous substances can represent a risk to health.

Lancaster City Council also recognises the extra duty of care towards members of public and vulnerable people to implement the necessary safety measures regarding the control and use of any potentially hazardous substance that is used within the organisation.

Lancaster City Council's policy, therefore, is to comply with both the letter and the spirit of the law on Health and Safety at Work and to this end, the provisions of this policy are centred around eliminating or controlling exposure to hazardous substances to prevent ill health to employees and others who may be exposed by:

- Ensuring that all reasonable steps are taken to eliminate substances which can be eliminated.
- Ensuring that suitable and sufficient risk assessments are carried out.
- Ensuring that where substances cannot be eliminated, all reasonable steps are taken to substitute for safer alternatives where these are available
- To ensure that where hazardous substances have to be used, exposure to them is minimised by adequate systems of control, which manage exposure within statutory limits.
- Providing all employees with comprehensible information and training on the nature and likelihood of exposure to substances relevant to their position and measures taken to minimise the risks to health

Lancaster City Council undertakes to control exposure by engineering means where reasonably practicable. Where exposure cannot be adequately controlled by engineering means, appropriate management systems and procedural controls will be implemented, and personal protective equipment will be provided.

3.0 ORGANISATION & MANAGEMENT

The organisation has a responsibility under sections 2 and 3 of the Health and Safety at Work etc. Act 1974 for the safety of employees and others who may be affected.

Under the Control of Substances Hazardous to Health Regulations 2002 (as amended) employers have a duty to make an assessment of the risks to health, which arise from exposure to hazardous substances in the workplace.

Chief Executive Officer

The Chief Executive Officer has overall responsibility for ensuring that the Organisation meets its statutory obligations and that effective arrangements for the management of health and safety are put in place.

Senior Leadership Team (Chief Officers)

The Senior Leadership Team have executive responsibility to manage Health and Safety including compliance with Health and Safety at Work Act, etc. 1974 and other relevant legislation, best practice guidance and Company policies to meet legal and organisational requirements within their respective services including the provision of adequate resources to meet the requirements of the risk assessment findings.

Chief Officers are responsible for the ensuring the provision of arrangements in relation to COSHH management and risk assessment and ensuring that the organisation's policy is implemented for their respective services, for providing support and advice to their respective managers and monitoring implementation of this policy within their respective areas.

The Health and Safety Team

The Health and Safety Team is responsible for facilitating the COSHH management process by offering advice, support and guidance and ensuring that information and training is available to Managers / Department Heads and other staff involved in the process.

Line Managers

All Line Managers have direct responsibility for health and safety matters relating to premises under their control and for persons reporting directly to them and are therefore responsible for the implementation of the provisions of this policy for the homes/departments under their jurisdiction by ensuring that:

- No work is undertaken that is liable to expose employees to substances hazardous to health unless a suitable and sufficient risk assessment has been carried out through the 'My Compliance' system, in writing detailing the risks and necessary control measures needed to meet the requirements of the COSHH regulations and associated approved code of practice.
- The assessment is reviewed when there is reason to believe that it is no longer valid or there has been a significant change in the work to which the assessment relates.
- Where a review indicates that changes are required, these changes are implemented.
- Hypochlorite solutions are not used other than for infection control where no substitute product is effective – e.g. outbreaks of Norovirus.
- Employees under their control receive Information, Instruction and training appropriate to the nature of the risks they may face from hazardous substances.
- Employees understand the risks from any hazardous substances they may be exposed to.
- Suitable and sufficient personal protective equipment (PPE) of the appropriate grade/specification is provided, for the control of any residual risk as determined by risk assessments and that where applicable it is appropriately maintained, cleaned, inspected, stored and replaced as required.
- Sufficient information; instruction and/or training is provided in the correct use and application of the Personal Protective Equipment
- Waste and spillages are dealt with in a safe manner with due regard for the environment.

Employees Responsibilities

Employees have a clear duty under Section 7 of the Health and Safety at Work etc. Act 1974 for the safety of themselves and others, therefore, the implementation of this policy requires the full co-operation of all levels of staff, by adhering to their responsibilities under the act.

Employees are therefore responsible for ensuring that they are fully aware of risk assessments in their area and the action they need to take as individuals to ensure compliance with control measures identified as being necessary, namely by:-

- Co-operating and assisting with COSHH Risk Assessments as required, and bring to the notice of management, any changes in labelling, packaging or physical properties of substances they use at work.
- Referring to and complying with COSHH and risk assessments.
- No substances are introduced into the premises without the permission of the appropriate manager and after a suitable assessment has been carried out.
- Promptly reporting all incidents concerning the use, storage and disposal of hazardous substances, to their line managers and in accordance with the Accident/incident reporting policy and through the My Compliance reporting.
- Reporting any adverse ill health effects arising from exposure to hazardous substances to their line manager
- Reading container labels being particularly careful with those having a hazard classification.
- Following safety procedures.
- Storing substances safely in accordance with manufacturer's instructions and onsite rules
- Never putting substances into unmarked containers.
- Attending/completing training as required.
- Ensuring that they are aware of, and follow, safe systems of work and control methods provided for their safety.
- They use and follow all control measures (i.e. ventilation, personal protective equipment) provided in the interests of safety.

- Being aware of emergency procedures
- Using personal protective equipment (PPE) in accordance with information; instruction and/or training provided and report any faults/defects or concerns regarding PPE to their line manager.
- Keeping any reusable PPE in a clean condition and stored in accordance with manufacturer's instructions (e.g. respirators)

Employees at all levels are reminded that they have a legal duty to ensure that the provisions of this policy and local establishment procedures and instructions are observed at all times. Failure to do so may render them subject to appropriate disciplinary action.

Health and Safety Trade Union Representatives

Health and Safety / Trade Union Representatives have certain responsibilities and duties and are able to audit and complete inspections where required.

A health and safety representative is a fellow worker who represents other union members to look after the health and safety at work of people they work with.

Health and Safety Representatives have the right to:

- take an active part in workplace risk assessments.
- investigate potential hazards and 'dangerous occurrences' and examine the accident data.
- investigate members' complaints.
- carry out inspections of the workplace in work time, at least every three months.
- be consulted on new working practices and new technology.
- receive safety information from their employer (such as inspectors' reports, hygiene surveys and risk assessments).
- attend union-approved training courses without loss of pay; and have access to a phone and office equipment, and paid time off work, both to carry out inspections and to meet staff and other safety reps.

4.0 RISK ASSESSMENT

Risk assessment for products identified by COSHH is a legal requirement to ensure the safety of all persons identified with our business activities. Due to the legal 'extra duty of care' we hold for the people we support, risk assessments may also be required for less hazardous products but labelled 'Keep out of reach of Children' as these still have the potential to cause significant harm. COSHH risk assessment / inventory module is available on My Compliance.

COSHH assessments should take a systematic approach by considering all factors relating to the use of substances hazardous to health. The assessment must also include reference to any emergency plans or procedures e.g. dealing with fire, spillage or first aid. They must clearly show all the control measures put in place either to prevent exposure or to achieve and maintain adequate control of exposure.

Where assessments require further control measures to be put in place, an action plan must be developed with responsibilities clearly allocated and actions timed.

Re-assessment must be undertaken whenever there are significant changes to:

- the substance's data sheet;
- the quantity or way in which it is used
- if there is reason to suspect that health is being adversely affected.

Substance data sheets should be updated at periodic intervals to ensure that copies of the most up to date are available on site.

Assessments must be working documents, copies of which must be kept readily available for reference. Obtain the appropriate COSHH data sheet for each hazardous substance used or stored within the premises. Product Data sheets are available from manufacturers or suppliers who have a legal duty to produce COSHH information on all hazardous products and make this available on request. The My Compliance system holds an inventory of product safety data sheets which is readily available.

The following criteria must be identified in the risk assessment process:

- Type of exposure (inhalation, absorption, ingestion or injection).
- Hazard classification (toxic, corrosive, harmful etc).
- Any hazard and precautionary statements.
- Safe systems of work & control measures.
- Personal Protective Equipment required including the type and grade.
- Mixtures & solutions.
- Fire, spillage & First Aid measures.
- Storage requirements.
- Waste disposal requirements.

5.0 CONTROL OF SUBSTANCES

Control measures must be determined by the level of risk to health and must take into account:

- Elimination and/or use of alternative, less hazardous substances and materials where possible.
- Modification of the use or process (work routine) to eliminate, isolate or reduce exposure.
- Elimination and/or reduction of numbers of people exposed to the hazardous substance.
- The outcome of any environmental monitoring, as appropriate, which has been undertaken by a competent person.
- The provision, maintenance and use of any control equipment required.
- The use of personal protective equipment (PPE) to reduce or control exposure to hazardous substances/materials. PPE should be regarded as a 'last resort' in providing protection from exposure to substances hazardous to health.

6.0 PROVISION OF INFORMATION

Each premises / team using / storing hazardous products must maintain a COSHH inventory on My Compliance, identifying all related products in use together with the obtained data sheet and completed Risk Assessment.

The folder must be properly maintained and reviewed, with regular audits carried out by the responsible manager.

The COSHH inventory can then be printed and stored within folders must be kept in areas appropriate to the activity location in case of an emergency:

- Kitchens
- Cleaning Stores
- Workshops/Stores
- Other specific activity areas

7.0 STORAGE & USE OF COSHH PRODUCTS

All substances identified as presenting a risk under COSHH must be stored in accordance with manufacturer's instruction and other measures as detailed within risk assessment and product data sheet. As a minimum, in a locked cupboard or secure compound not accessible by unauthorised persons.

Substances **must not be decanted into other containers that are not intended for dilution or by that product, particularly any containers originally used for food and drink**, but to remain in that in which it was supplied. All containers must be clearly labelled identifying the contents and dilution strength.

Substances must not be mixed unless directed by manufacturer's instructions.

Hazardous substances must not be used where there is any risk of contact with the people.

The provision of suitable personal protective equipment (PPE) should be made and training in its use provided wherever the need of PPE is identified in the risk assessment.

8.0 PPE and RPE

Personal Protective Equipment and Respiratory Protective Equipment is equipment that will protect the user against health or safety risks at work. It can include items for working with COSHH such as masks, gloves, air-fed hoods and goggles etc.

Each COSHH Risk Assessment must identify the appropriate PPE to be worn whilst using the substance(s) and the use of the PPE must be monitored by Line Managers.

When selecting PPE:

- choose good quality products which are CE marked in accordance with the Personal Protective Equipment Regulations 2002 – suppliers can advise the procurement officer.
- choose equipment that suits the wearer – consider the size, fit and weight; you may need to consider the health of the wearer, e.g. if equipment is very heavy, or wearers have pre-existing health issues, standard PPE may not be suitable.

Make sure anyone using PPE is aware of why it is needed, when to use, repair or replace it, how to report it if there is a fault and its limitations.

9.0 TRAINING

As part of induction training for identified appropriate staff groups, new staff will receive training for COSHH, which shall include:

- How to recognise a product which comes under COSHH by the product labelling identifying information.
- Action required when identifying a new COSHH product (obtain manufacturer data sheet).
- How to carry out a suitable & sufficient Risk Assessment for the product (approved by the line manager).
- Storage of COSHH products.
- The importance of the correct use and storage of related Personal Protective Equipment.
- Informing staff of products which are forbidden to use (i.e. Bleach).
- COSHH products are not to be introduced until the data sheets are obtained and the Risk Assessment process complete within My Compliance.

Local training by the Line manager will identify local arrangements including storage, First Aid arrangements and locations of COSHH folder(s).

For staff groups working with classified hazardous products, direct line managers must ensure that staff receive appropriate training for the safe use of that product.

Refresher training must be completed within a three-year period from initial induction and repeated at three yearly intervals thereafter.

Please refer to the My Compliance training video available for further information.

10.0 MONITORING & REVIEW

This policy will be reviewed as part of the regular cycle of reviews, unless changing circumstances require an earlier review.

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1.0 INTRODUCTION

Poor manual handling can lead to various types of musculoskeletal disorders, and this therefore emphasises the need for the use of best practice techniques to prevent injury.

Manual handling injuries are part of a wider group of musculoskeletal problems. An estimated 6.9 million working days are lost to work-related musculoskeletal disorders (MSDs), this represents 29% of all days lost due to work related ill-health (Health & Safety Executive HSE 2019).

Manual handling injuries can happen anywhere people’s employment includes manual handling. Heavy manual labour, awkward postures, manual materials handling, people handling and previous or existing injury are all risk factors in developing musculoskeletal disorders (MSDs).

Purpose – To provide staff with a clear statement of the measures that will be taken by the Organisation to minimise the risks presented by manual handling and the measures required to safeguard against injury from manual handling.

Implementation – It is the responsibility of line managers to ensure that staff members are aware of and understand this policy and any subsequent revisions.

Where the conditions of service delivery or its associated tasks require staff to be involved with manual handling. Both the individual staff member and manager have a duty to assess and reduce the risks which are presented in such a case.

2.0 GENERAL POLICY STATEMENT

Lancaster City Council acknowledges the importance of safe moving and handling practices and will comply fully with the provisions of the Moving and Handling Operations Regulations 1992 as amended in 2002 and current legislation pertaining to safer handling practices.

The aim of the organisation’s policy, therefore, is to comply with both the letter and the spirit of the law on Health and Safety at Work and to this end, the provisions of this policy are centred around reducing the risk of manual handling injuries to employees and others by avoidance of hazardous manual handling operations so far as is reasonably practicable, and where handling operations cannot be avoided minimising the risk of injury so far as is reasonably practicable by supporting the continual development of safer handling practices using an ergonomic approach.

Accidents/incidents or near misses must be reported through the organisation’s electronic accident reporting system ‘My Compliance’. Specified Injuries and those causing employees to be incapacitated for more than 7 working days are reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013, to the Enforcing Authority for Health and Safety through the Incident Contact Centre.

3.0 KEY LEGISLATION

The Health and Safety at Work etc Act 1974 (“the Act”), sets out the general duties which employers have towards employees and others, and which employees have to themselves and to each other. These duties are qualified in the Act by the principle of ‘*so far as reasonably practicable*’. In other words, an employer does not have to take measures to avoid or reduce the risk if they are technically impossible or if the time, trouble or cost of the measures would be grossly disproportionate to the risk.

The Management of Health and Safety at Work Regulations 1999 (as amended), generally make more explicit what employers are required to do to manage health and safety under the Act. Duties under these Regulations apply to every work activity. The main requirement on employers is to carry out suitable and sufficient risk assessments. Where there are five or more employees there is a standard requirement to record the significant findings of the risk assessments.

The Manual Handling Operations Regulations 1992 (as amended), seek to prevent injury from the manual handling of loads. They establish a clear hierarchy of measures for dealing with risks from manual handling as follows:

- avoid hazardous manual handling operations so far as reasonably practicable;
- assess any hazardous manual handling operations that cannot be avoided; and,
- reduce the risk of injury so far as reasonably practicable.

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013 require that certain types of accidents, specific cases of occupational ill health and some dangerous occurrences have to be reported to the relevant enforcing authority for health and safety through the Incident Contact Centre.

The Lifting Operations and Lifting Equipment Regulations (LOLER) 1998 require that equipment used for lifting people and lifting accessories are thoroughly inspected by a competent person every six months or at intervals based on risk assessment by a competent person. Lifting operations must be properly planned by a competent person, appropriately supervised and carried out in a safe manner. All equipment will have the instructions for its safe use readily available to all staff.

The Provision and Use of Work Equipment Regulations (PUWER) 1998, require risks to people’s health and safety from any equipment, including handling aids that they use at work, to be prevented or controlled

4.0 DEFINITIONS

Manual Handling

Manual handling is defined as any transporting or supporting of a load (including the lifting, putting down, pushing, pulling, carrying or moving thereof) by hand or bodily force.

Load

A load in this context must be a discrete movable object. This includes, for example, not only packages and boxes but also a person we support being lifted, an animal being moved during veterinary treatment, and material supported on a shovel or fork. An implement, tool or machine, such as a chainsaw, fire hose or breathing apparatus, is not considered to be a load when in use for its intended purpose.

Ergonomics

Described as fitting the job to the person rather than the person to the job.

5.0 ORGANISATION AND MANAGEMENT

Chief Executive Officer

The Chief Executive Officer has overall responsibility for ensuring that the Organisation meets its statutory obligations and that effective arrangements for the management of health and safety are put in place. The Chief Executive Officer has executive responsibility to manage Health and Safety including compliance with Health and Safety at Work Act, etc. 1974 and other relevant legislation, best practice guidance and Company policies to meet legal and organisational requirements.

Senior Leadership Team (Chief Officers)

The Chief Officers have ultimate responsibility for ensuring that the Organisation meets its statutory obligations and that effective arrangements for the management of health and safety are put in place and are therefore responsible for setting and approving policy direction in relation to manual handling.

The Health and Safety Team

The Health and Safety Team are responsible for advising on appropriate measures to meet legal and organisational requirements as required.

Line Managers

Are responsible for the implementation of this policy within the premises / team for which they are responsible by:

- Ensuring that adequate arrangements are in place to comply with the policy
- Organising work to avoid manual handling whenever possible
- Identifying hazardous manual handling tasks
- Ensuring that risk assessments are undertaken and any risk reduction/control measures, are identified and implemented
- Ensuring that risk assessments are reviewed on a regular basis, either; annually or, when the work changes significantly, or following an accident or case of ill health, or when the validity of the assessment is suspected, or when there are legislative changes.
- Ensuring the risk assessments are completed on the 'My Compliance' system.
- To make sure manufacturer's instructions for any equipment are stored and readily accessible to staff to enable correct and safe use of the equipment.
- Ensuring that equipment is cleaned between use as per the Infection Control Policy.

- Ensure that employees, contractors and visitors are given information about handling tasks
- Ensure that appropriate instruction, training and supervision is given to new employees and that staff are updated as the service demands.
- Ensure their own training needs are met in terms of keeping up to date with new developments /professional guidelines in relation to manual handling.
- Ensure employees adhere to safe handling techniques and are supervised if and where necessary by workplace supervision and inspection.
- Reasonable adjustments are made, when necessary, for employees with health conditions who could be adversely affected by manual handling operations
- To report any accidents, incidents and near misses in accordance with the Accident Reporting Policy.

Employees

- Being familiar with risk assessments and the control measures.
- Ensuring their own health and safety, that of colleagues and the people we support is not put at risk when carrying out manual handling activities.
- Following safe systems of work as detailed in handling risk assessments.
- Carrying out dynamic risk assessments to carrying out handling tasks especially for high risk moving.
- They use equipment which has been provided to minimise the risk from manual handling activities in accordance with manufacturer's instructions and training.
- Ensuring that equipment is clean for each use as per the Infection Prevention and Control Policy.
- Checking equipment prior to use and report any defects to their Line Manager.
- Reporting to their Manager any personal conditions which may be detrimentally affected by the manual handling activity.
- Complying with instruction and training which has provided in safe manual handling activities.
- Ensuring that they attend update training as relevant to their services.
- Reporting any problems or shortcomings relating to the manual handling risk assessments and activities to their Line Manager.

Health and Safety Trade Union Representatives

Health and Safety / Trade Union Representatives have certain responsibilities and duties and are able to audit and complete inspections where required.

A health and safety representative is a fellow worker who represents other union members to look after the health and safety at work of people they work with.

Health and Safety Representatives have the right to:

- take an active part in workplace risk assessments.
- investigate potential hazards and 'dangerous occurrences' and examine the accident data.
- investigate members' complaints.
- carry out inspections of the workplace in work time, at least every three months.
- be consulted on new working practices and new technology.
- receive safety information from their employer (such as inspectors' reports, hygiene surveys and risk assessments).
- attend union-approved training courses without loss of pay; and have access to a phone and office equipment, and paid time off work, both to carry out inspections and to meet staff and other safety reps.

6.0 HAZARDS

Manual handling tasks can result in injury of which some are caused by the cumulative effect of poor manual handling techniques over a period of time, rather than one isolated incident. It is therefore essential that good training is provided at induction and ongoing in order to avoid poor practice, or so that any identified poor practice can be corrected as soon as possible.

Within the organisation's service provision, the carrying out of physical manual handling can result in a manual handling injury and for this reason, all new staff receive Manual Handling Training.

7.0 RISK ASSESSMENT

There is no such thing as a completely safe manual handling activity, although working within prescribed guidelines will reduce the risk of injury and the need for a more detailed assessment.

Where the conditions of service delivery or its associated tasks require staff to be involved with manual handling activities, Managers have a duty to:

- Avoid hazardous manual operation where possible.
- Assess any unavoidable hazardous operations.
- Reduce the risk of injury from hazardous manual handling as far as reasonably practicable for all.
- Review the risk assessments at regular intervals and as and when any changes occur or following an incident/near miss

The guidance contained within the Manual Handling Operations Regulations 1992 recommends assessment weights for manual handling activities for both men and women to help identify activities that could present a significant risk and avoid the need for a more detailed assessment for those that don't.

Managers are responsible for ensuring that manual handling risk assessments for their area of responsibility are undertaken to identify manual handling hazards in relation to moving objects or equipment. In order to highlight the control measures needed to reduce the risks to the lowest level reasonably practicable.

The risk assessment when completed in written form must be kept up-to-date and relevant, therefore they should be regularly reviewed and updated if any changes arise to the activity, a person's needs, the environment or equipment, or following an accident/incident or near miss, following the TILE approach. Consider the following factors when undertaking an assessment:

The task - does the task involve:

- Twisting or stooping
- Strenuous pushing or pulling
- Excessive lifting or lowering
- Handling at a distance from the trunk
- High task frequency without adequate rest periods

The individual capability - do the people carrying out the tasks require:

- Specialised training
- Unusual strength or ability
- A uniform or personal protective equipment
- Consideration during impaired ability – for example if pregnant

The load - is the person or object being moved:

- Heavy or large

- Unwieldy or difficult to grasp
- Unpredictable or unstable
- Vulnerable to injury or fragile
- Sharp, hot or hazardous in any other way

The Environment - does the area in which work is carried out have:

- Restricted space
- Slippery or uneven floors
- Slopes ramps or steps
- Adequate levels of heat light and ventilation

Equipment - is any equipment used:

- Suitable for the task
- Available in all circumstances
- Maintained and inspected
- Clean

Manual handling training will be provided for all employees to ensure that where it is not practicable to eliminate manual handling, safe practice is used.

8.0 EQUIPMENT

All manual handling equipment must be in good working order at all times, or a replacement found to enable staff to continue working safely.

Equipment should be used in accordance with manufacturer's instructions and shall be subject to a visual inspection prior to use. this includes any small handling aid as well as hoist and slings.

It must be ensured that suitable arrangements are in place regarding items of moving and handling equipment to ensure that they are inspected/serviced in accordance with the requirements of LOLER (1998, as amended 2002) and PUWER (1998).

9.0 INFORMATION & TRAINING

All staff who undertake manual handling tasks, must complete basic company training in manual handling, this may include the safe use of any equipment specifically designed to aid manual handling tasks.

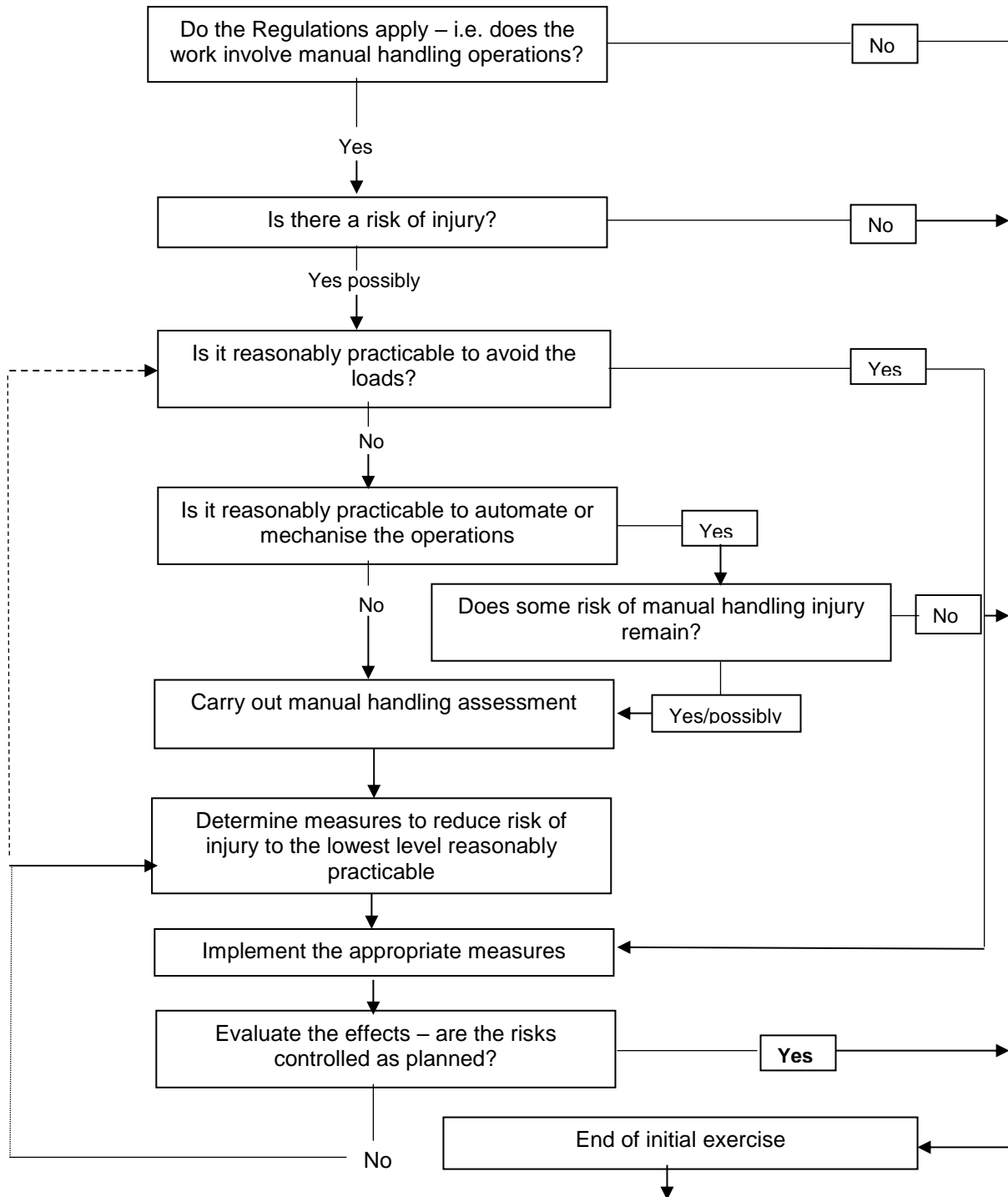
Manual handling training is part of induction and ongoing refresher training, it is organised by the Learning and OP Department.

There is more information and advice on manual handling and MSDs on the HSE website, including advice on managing back pain at work.

- <http://www.hse.gov.uk/msd/manualhandling.htm>

10.0 PROCESS (FLOWCHART)

The following flow diagrams illustrates the process which should be applied to all manual handling activities.



Review if conditions change significantly

11.0 ACCIDENT/INCIDENT REPORTING

All staff have a duty to report an accident/incident associated with moving and handling by completing an entry on the organisations electronic accident/incident reporting system 'My Compliance' and co-operate in any follow-up investigation in accordance with the Accident/Incident Reporting Policy.

12.0 MONITORING, AUDIT & REVIEW

The Health and Safety Team and Health and Safety Trade Union Representatives will regularly monitor any accidents related to manual handling and provide advice and support to managers as need dictates.

This policy will be reviewed as part of the regular reviews, unless changing circumstances require an earlier review

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1.0 INTRODUCTION

Purpose: This policy sets out the approach undertaken by Lancaster City Council to reduce the risk of harm related to noise and vibration in the workplace, as part of its strategy for promoting health at work through good practice and to enhance well-being amongst its employees.

This policy aims to ensure the company complies with its responsibilities under Health and Safety at Work legislation. The tools mentioned within this policy are those that have been designed by the Health and Safety Executive.

This policy aims to educate managers and employees, in the companies working practices to reduce the factors that may contribute to noise and vibration related harm such as Hand-Arm Vibration Syndrome (HAVS), hearing loss, tinnitus and white-finger

Scope: This policy applies to all staff and other persons working on Lancaster City Council premises

2.0 GENERAL STATEMENT

Lancaster City Council recognises that exposure to noise and vibration can represent a risk to health.

Lancaster City Council also recognises the extra duty of care towards members of public and vulnerable people to implement the necessary safety measures regarding the control and use of any noise levels and vibration hazards they are exposed to.

Lancaster City Council's policy, therefore, is to comply with both the letter and the spirit of the law on Health and Safety at Work and to this end, the provisions of this policy are centred around eliminating or controlling exposure to noise and vibration to prevent ill health to employees and others who may be exposed by:

- Ensuring that all reasonable steps are taken to eliminate the noise and vibration where practicable.
- Ensuring that suitable and sufficient risk assessments are carried out.
- Ensuring that where noise and vibration cannot be eliminated, all reasonable steps are taken to substitute for safer alternatives where these are available .
- To ensure that where noise and vibration have to be used, exposure to them is minimised by adequate systems of control, which manage exposure within statutory limits.
- Providing all employees with comprehensible information and training on the nature and likelihood of exposure to noise and vibration relevant to their position and measures taken to minimise the risks to health.

Lancaster City Council undertakes to control exposure by engineering means where reasonably practicable. Where exposure cannot be adequately controlled by engineering means, appropriate management systems and procedural controls will be implemented and personal protective equipment will be provided.

3.0 RESPONSIBILITIES

Chief Executive Officer

The Chief Executive has overall responsibility for ensuring that the Organisation meets its statutory obligations and that effective arrangements for the management of health and safety are put in place.

Senior Leadership Team (Chief Officers)

The Senior Leadership Team have ultimate responsibility for ensuring that the company meets its statutory obligations and that effective arrangements for the management of health and safety are put in place and are therefore responsible for setting and approving policy direction in relation to noise and vibration.

The Health and Safety Team

The Health and Safety Team have responsibility to advise on Health and Safety including compliance with Health and Safety at Work Act, etc. 1974 and other relevant legislation, best practice guidance and company policies to meet legal and organisational requirements.

The Health and Safety Team are also responsible for the ensuring the provision of arrangements in relation to noise and vibration and ensuring that the company's policy is implemented for their respective services, for providing support and advice to their respective managers and monitoring implementation of this policy within their respective areas.

The Health and Safety Team is responsible for advising on appropriate measures to meet legal and organisational requirements as required

Line Managers

Line Managers have direct responsibility for health and safety matters relating to premises under their control and for persons reporting directly to them and are therefore responsible for the implementation of the provisions of this policy for the departments under their jurisdiction by:

- Consulting employees on work involving noise and vibration.
- Ensuring risk assessment have been completed within the My Compliance system and communicated to all team members.
- Implementing measures to reduce the risk.
- Identify vibration risk activities and reduce vibration at source where practicable.
- Ensure all vibration exposed employees have sufficient information, instruction and training to protect themselves from the exposure to vibration.
- Ensure suitable control measures are provided as identified by risk assessment and facilities are provided for dry and clean storage of Personal Protective Equipment.
- Ensure that all vibration exposed employees attend routine health surveillance as required.
- Ensure that this policy is enforced.
- Ensure new reported symptoms are referred to the Occupational Health Provider

Employees

Employees are responsible for co-operating with Line Managers to enable them to provide a safe working environment and ensure legal compliance by:

- Adhering to this policy and any subsequent procedures, processes and work instructions.
- Cooperate with management with regards to implementing controls and safe working practices.
- Ensuring all PPE, provided by the company, is used and maintained.
- Reporting defects, damage and faults with equipment or controls, to management.
- Attending/completing any training related to noise and vibration, that has been provided by the Organisation.
- Ensure vibration control measures are used as identified by risk assessment.
- Attend routine health surveillance as required.
- Not to tamper or modify anything provided for their health, safety or welfare.
- Report any deficiencies in the work procedures or Personal Protective Equipment to their line manager.
- Ensure lost or damaged PPE is replaced before exposure to vibration.
- Report any deficiencies in control measures or faulty equipment to their line manager.
- Report any new vibration related symptoms to their line manager.

Health and Safety Representatives / Trade Union Representatives

Health and Safety / Trade Union Representatives have certain responsibilities and duties and are able to audit and complete inspections where required.

A health and safety representative is a fellow worker who represents other union members to look after the health and safety at work of people they work with.

Health and Safety Representatives have the right to:

- take an active part in workplace risk assessments.
- investigate potential hazards and 'dangerous occurrences' and examine the accident data.
- investigate members' complaints.
- carry out inspections of the workplace in work time, at least every three months.
- be consulted on new working practices and new technology.
- receive safety information from their employer (such as inspectors' reports, hygiene surveys and risk assessments).
- attend union-approved training courses without loss of pay; and have access to a phone and office equipment, and paid time off work, both to carry out inspections and to meet staff and other safety reps.

4.0 VIBRATION

Definition of Hand-Arm Vibration

Hand-arm vibration is vibration transmitted from work processes into workers' hands and arms. It can be caused by operating hand-held tools and hand guided equipment or by holding materials that are being vibrated.

Training

Lancaster City Council will provide sufficient information, instruction and training as is necessary to ensure the health, safety and welfare of workers who are frequently exposed to vibration levels above the vibration Exposure Action Value.

Managers and supervisors who are responsible for workers exposed to vibration or who organise and plan work where vibration exposure is apparent will also be given appropriate training.

Assessing Hand and Arm Vibration

It is the Organisation's policy to utilise the Health and Safety Executive's HAVS Tool. Each Line Manager must assess each vibrating tool / equipment and upload the completed calculator into the task risk assessment on My Compliance.

A link to the HSE's HAVS Tool is [here](#).

5.0 NOISE

The Health Effects of Noise

Noise at work can cause hearing loss that can be temporary or permanent. People often experience temporary deafness after leaving a noisy place. Although hearing recovers within a few hours, this should not be ignored. It is a sign that if you continue to be exposed to the noise your hearing could be permanently damaged. Permanent hearing damage can be caused immediately by sudden, extremely loud, explosive noises, i.e. cartridge operated machines.

Hearing loss is usually gradual because of prolonged exposure to noise. It may only be when damage caused by noise over the years combines with hearing loss due to ageing that people realise how deaf they have become. This may mean their family complains about the television being too loud, they cannot keep up with conversations in a group, or they have trouble using the telephone. Eventually everything becomes muffled, and people find it difficult to catch sounds like 't', 'd' and 's', so they confuse similar words.

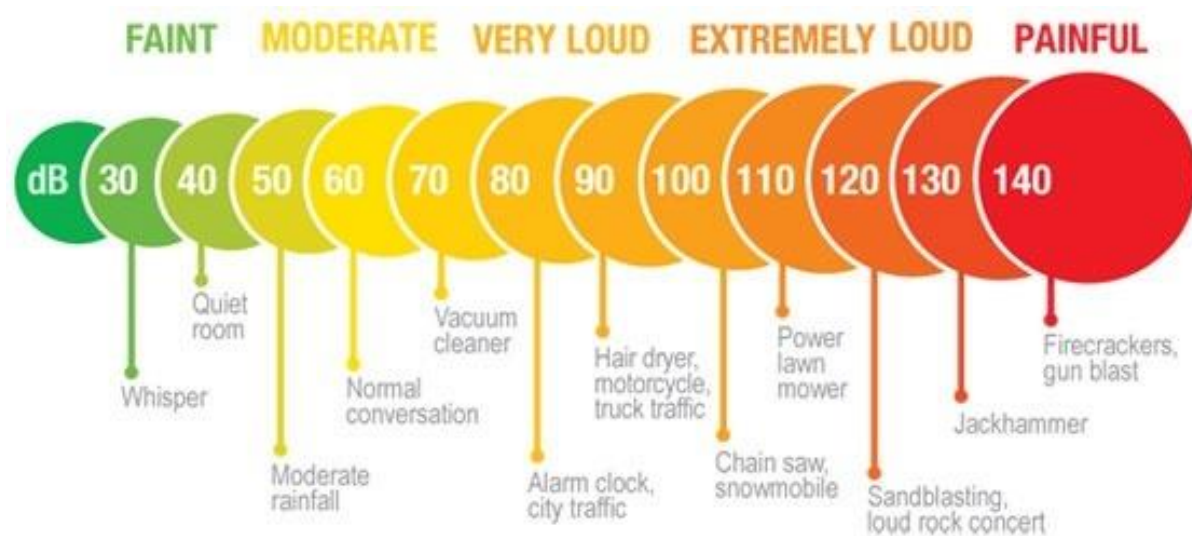
Hearing loss is not the only problem. People may develop tinnitus (ringing, whistling, buzzing or humming in the ears), a distressing condition which can lead to disturbed sleep.

How is noise measured?

Noise is measured in decibels (dB). An 'A-weighting sometimes written as 'dB(A)', is used to measure average noise levels, and a 'C-weighting' or dB(C), to measure peak, impact or explosive noises. You might just notice a 3dB change in noise level, because of the way our ears work. Yet 3dB doubles the noise, so what might seem like small differences in the numbers is quite significant.

Noise Appreciation Chart

The following chart is to help you appreciate the levels of noise that you may be exposed to.



Noise Levels and Limits

Noise Action Levels and Limit Values

The Noise Regulations require us to take specific action at certain action values.

These relate to:

- the levels of exposure to noise of our employees averaged over a working day or week; and
- the maximum noise (peak sound pressure) to which our employees are exposed in a working day.

The values are:

- lower exposure action values:
 - daily or weekly exposure of 80 dB;
 - peak sound pressure of 135 dB;
- upper exposure action values:
 - daily or weekly exposure of 85 dB;
 - peak sound pressure of 137 db.

The actions you need to take are described in the flow chart shown at figure 1 later in this document.

There are also levels of noise exposure which must not be exceeded. These are called exposure limit values:

- daily or weekly exposure of 87 dB;
- peak sound pressure of 140 db.

Noise Risk Assessments

It is important that our employees understand the risks they may be exposed to. To ensure that this happens, the company will carry out risk assessments of all areas where there *may* be a risk from noise.

These risk assessments will:

- Identify where there may be a risk from noise and who is likely to be affected.
- Contain a reliable estimate of exposures and compare the exposure with the exposure action values and limit values.
- identify what you need to do to comply with the law, e.g. whether noise-control measures or hearing protection is needed, and, if so, where and what type.
- Identify any employees who need to be provided with health surveillance and whether any are at particular risk.

Hearing Protection

We will provide hearing protection where necessary. This hearing protection will be issued on induction to the Company and is the responsibility of the holder to ensure that they are looked after and kept in good working order.

Should these need replacing at any time, the manager is to be informed who will arrange replacement. At no time should any work, requiring hearing protection, be carried out without the correct, serviceable protective equipment being worn.

Disposable hearing protection is available in all locations that experience high levels of noise.

Noise Monitoring

Where specific tasks / workplaces have noisy areas a Noise Assessment / Monitoring must be completed at least on an annual basis.

6.0 MONITORING

The requirements of this Policy will be monitored by way of a risk prioritised process of auditing, regular inspections and periodic self-audits.

The training and responsibilities of individuals will be monitored by the company through its management and appraisal processes.

Where necessary the company will take appropriate action to ensure that this policy is upheld.

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1.0 INTRODUCTION

This policy sets out the circumstances in which Personal Protective Equipment (PPE) may be deemed necessary and the procedure for sourcing, use and maintenance of PPE.

The main requirement of the Personal Protective Equipment at Work Regulations 1992 is that personal protective equipment is to be supplied free of charge and used at work wherever there are risks to health and safety that cannot be adequately controlled by other means.

This policy is relevant to all employees especially Line Managers who are responsible for staff completing tasks which have the potential to cause harm where it is required to use Personal Protective Equipment, described in the definition below.

Personal Protective Equipment (PPE) is defined in the Regulations as 'all equipment which is intended to be worn or held by a person at work and which protects them against one or more risks to their health or safety' e.g. Aprons, gloves, eye protection, high-visibility clothing and safety footwear.

2.0 IMPLEMENTATION

Where the conditions of service delivery or its associated tasks require staff to use Personal Protective Equipment, both the individual staff member and manager have a duty to assess and reduce the risks which are presented in such a case.

3.0 RESPONSIBILITIES

Chief Executive Officer

The Chief Executive Officer has overall responsibility for ensuring that the Organisation meets its statutory obligations and that effective arrangements for the management of health and safety are put in place. The Chief Executive Officer has executive responsibility to manage Health and Safety including compliance with Health and Safety at Work Act, etc. 1974 and other relevant legislation, best practice guidance and Company policies to meet legal and organisational requirements.

Senior Leadership Team (Chief Officers)

The Chief Officers have ultimate responsibility for ensuring that the Organisation meets its statutory obligations and that effective arrangements for the management of health and safety are put in place and are therefore responsible for setting and approving policy direction in relation to manual handling.

The Health and Safety Team

The Health and Safety Team are responsible for advising on appropriate measures to meet legal and organisational requirements as required.

Line Managers

The responsible manager has a duty to provide users of PPE suitable information, training and instruction enabling them to make proper effective use of PPE.

Training for PPE users must include the following:

- An explanation of the risks present and why the PPE is being used
- How to operate the PPE and any limitations of the equipment which may affect the protection offered
- Instructions on the storage of the PPE
- The arrangements for reporting loss or defects of the PPE

Having provided PPE as a last resort after considering other safety measures, it is important that users wear it at all times when exposed to the risk, the responsible manager must also provide suitable supervision ensuring that identified required PPE is worn.

Employees

The Regulations place the following duties on employees:

- PPE must be examined before use.
- Use any PPE provided as instructed.
- Any loss or obvious defect must be reported to the Line Manager.
- Employees must take reasonable care of any PPE provided to them.
- Report hazards and risks to their Line Manager, including any lack of PPE provision, defects in the PPE provided or lack of suitability.

Health and Safety Trade Union Representatives

Health and Safety / Trade Union Representatives have certain responsibilities and duties and are able to audit and complete inspections where required.

A health and safety representative is a fellow worker who represents other union members to look after the health and safety at work of people they work with.

Health and Safety Representatives have the right to:

- take an active part in workplace risk assessments.
- investigate potential hazards and 'dangerous occurrences' and examine the accident data.
- investigate members' complaints.
- carry out inspections of the workplace in work time, at least every three months.
- be consulted on new working practices and new technology.
- receive safety information from their employer (such as inspectors' reports, hygiene surveys and risk assessments).
- attend union-approved training courses without loss of pay; and

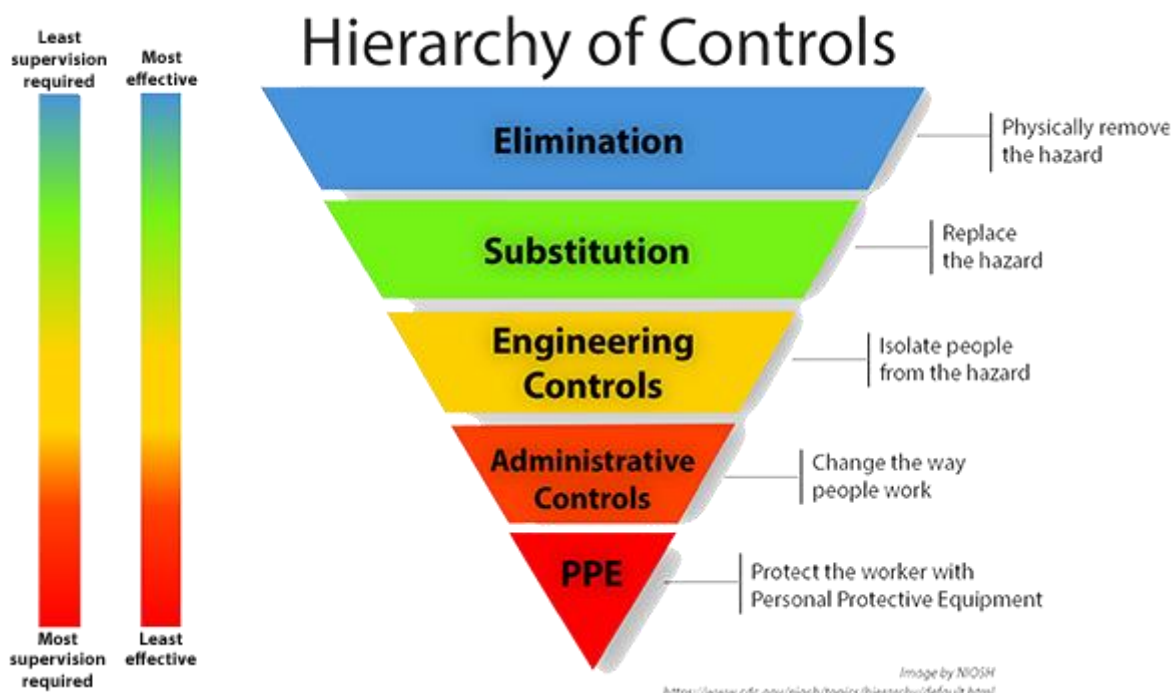
- have access to a phone and office equipment, and paid time off work, both to carry out inspections and to meet staff and other safety reps.

4.0 HIERACHY OF CONTROL

Personal protective equipment (PPE) include gloves, glasses, earmuffs, aprons, safety footwear, dust masks which are designed to reduce exposure to the hazard. PPE is usually seen as the last line of defence only after all the previous measures have been tried and found ineffective in controlling risks to a reasonably practicable level must personal protective equipment (PPE) be used. It is also usually used in conjunction with one or more of the other control measures.

For example where you cannot eliminate the risk of a fall, use work equipment or other measures to minimise the distance and consequences of a fall (should one occur). If chosen, PPE should be selected and fitted by the person who uses it. Workers must be trained in the function and limitation of each item of PPE

There is a recognised hierarchy of controls within Health and Safety which shows that other controls must be considered before the control of personal protective equipment as described:



Eliminate hazard at source, e.g.

- use a non-hazardous substance instead of a hazardous one
- stop using a noisy machine

Substitute the hazard at source, e.g.

- use a substance less hazardous than the one used at present
- replace a noisy machine with a quieter one

Isolate person from hazard, e.g.

- do not allow people to work near noisy machines
- isolate the hazard

- fit guards

Reduce employee exposure, e.g.

- reduce the amount of time people are exposed to noise by alternating staff regularly.

Personal protective equipment (PPE), e.g.

- gloves, goggles for substances and ear defenders for noise

5.0 ASSESSING FOR SUITABLE PERSONAL PROTECTIVE EQUIPMENT AND RESPIRATORY PROTECTIVE EQUIPMENT

As identified in other health and safety legislation, where there is a requirement for risk assessments to be undertaken, those risk assessments should identify the need for the provision and wearing of any PPE and RPE and should include the type and grade of the equipment required for example FFP3 masks, disposable unpowered vinyl gloves etc.

To allow the right type of equipment to be chosen the different hazards in the workplace need to be considered carefully. This will enable an assessment to be made of which types of PPE are suitable to protect against the hazards for a particular task.

The following factors should be considered when assessing the suitability of equipment:

- Is it appropriate for the risks involved and the conditions at the place where exposure to risk may occur? For example, eye protection designed for providing protection against flying debris may not be suitable to prevent chemical splashes into the eye and vice versa.
- Can it be adjusted to fit the wearer correctly- some facemasks/respirators require a face fit tests
- Is it to a recognized standard? i.e. marked with CE
- Is the rating of the PPE / RPE suitable for its intended use?

The level of protection that equipment provides will vary in accordance with the intended use and hazard type. The CE mark signifies complies with the relevant European community provisions on design and manufacture.

Additional markings or EN numbers will identify its level of protection. It is critical that the appropriate level of PPE is identified for the hazard it is protecting against. It is advisable to obtain advice from reputable suppliers whenever making a purchase, or alternatively seeking advice from the Health and Safety Team.

6.0 WEARING RPE

These are some of the key factors for users of RPE to remember:

- Users of tight-fitting facepieces should have passed a fit test for the particular RPE device they are using.
- Hair, spectacles or other PPE can break the seal on tight-fitting facepieces, allowing the user to breathe in hazardous substances.
- Valves on reusable RPE need to be maintained and replaced.

7.0 CARE & MAINTENANCE OF PPE / RPE

Equipment needs to be well looked after and be properly accommodated when not in use, for example stored in a dry clean cupboard or in the case of smaller items such as eye protection in a box or case.

8.0 FACE FIT TESTING

If you are considering RPE with a tight-fitting facepiece, you should make sure that each wearer undergoes a fit test. Remember, people come in different shapes and sizes, so facial differences will mean that one kind of RPE is unlikely to fit all. The differences are even more significant between men, women, and people of different ethnicity. If the RPE does not fit, it will not protect the wearer.

Facepiece fit testing is a method of checking that a tight-fitting facepiece matches the wearer's facial features and seals adequately to their face. It will also help to identify unsuitable facepieces that should not be used. Remember that tight-fitting RPE will only provide effective protection if the wearer is clean shaven, so they should also be clean shaven when fit tested.

Please book all face fit testing through the Stores team and White Lund Depot.

9.0 MONITORING & REVIEW

The ongoing requirement and use of PPE / RPE will be monitored through the risk assessments and their updates and the supervision process.

Any member of staff with a concern regarding this issue should ensure that it is discussed with their supervisor / manager or with the team, as appropriate.

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1.0 INTRODUCTION

Falls from height account for a significant number of workplace injuries and unnecessary deaths every year across a wide range of work at height activities. Common causes are falls from ladders and through fragile roofs. The purpose of the 'Working at Height Regulations 2005' (WAHR) is to prevent death and injury from a fall from height.

The WAHR operate alongside the 'Management of Health and Safety at Work Regulations 1999', which require an employer to undertake a suitable and sufficient risk assessment of the health and safety issues within the workplace that may affect employees and others associated with the business activities.

These regulations apply in all cases where an assessment indicates there is a possibility of risk of a fall whilst carrying out a task.

Purpose

This policy is intended to alert staff of the risks presented by working at height and the measures required to safeguard against injury, also to identify the responsibilities of individuals in identifying and managing risk.

Scope

This policy applies to all staff and their line managers/supervisors who may be involved with working at height, at any time, in any situation described in the definition below.

2.0 GENERAL STATEMENT

The organisation acknowledges that working at height can lead to accidents many of which can result in serious injury or death. The organisation's policy therefore, is to comply with both the letter and the spirit of the law on Health and Safety at Work, specifically in accordance with the Work at Height Regulations 2005 and to this end, the provisions of this policy are centred around ensuring that in any requirement for an employee to work at height all the factors involved in the planning, organisation and provision of access equipment have been given due attention to ensure safety of those individuals involved has been maintained. The provision of any access equipment has to be given much more consideration than simply assuming that existing equipment is fit for all the tasks it is being used for.

Most organisations will require their staff to use equipment of ranging types to perform a range of tasks that may require some form of work at height to be involved. This could be use of ladders (any type) to use of Mobile Elevated Work Platforms (MEWPs) and the Regulations therefore apply. Falls or falling objects even from heights at relatively low levels present an unacceptable risk to people.

The overriding principle for the organisation is to do "all that is reasonably practicable to prevent anyone falling". Consequently the procedures and guidance below must be undertaken prior to commencing any work at height.

This working at height policy supports and extends the organisation's Health and Safety policy and provides guidance for those operations which involves working above or below the ground where falls or falling objects are likely to cause injury. Both the organisation and contractors working on the organisation's premises all have responsibilities under health and safety law. By employing a contractor, the organisation will not be able to handover total responsibility and must take care to discharge its own responsibilities diligently.

Implementation: It is the responsibility of line managers to ensure that staff members are aware of and understand this policy and any subsequent revisions.

3.0 DEFINITION

The term 'Working at height' is carrying out a task in any place, including a place at, above or below ground level, where a person can be injured if they fell from that place. Access and egress (getting in & out) from a place of work can also be work at height.

Examples include:

- Use of a kick stool
- Use of any step ladder/ladder
- Working on a flat roof
- could fall through a fragile surface;
- could fall into an opening in a floor or a hole in the ground.
- Working at ground level adjacent to an open excavation

Examples where the regulations don't apply:

- Walking up and down staircases
- Slipping or tripping at ground level
- Sitting on a chair

4.0 ORGANISATION AND MANAGEMENT

Chief Executive Officer

The Chief Executive has overall responsibility for ensuring that the Company meets its statutory obligations and that effective arrangements for the management of health and safety are put in place.

Senior Leadership Team (Chief Officers)

The Senior Leadership Team have responsibility for ensuring that the Organisation meets its statutory obligations and that effective arrangements for the management of health and safety are put in place and are therefore responsible for setting and approving policy direction.

The Health and Safety Team

The Health and Safety Team are responsible for advising on appropriate measures to meet legal and organisational requirements as required and for regularly monitoring and reviewing any incidents/accident that involve working at height to ensure that the provisions of this policy were implemented.

Line Managers

Line Managers are responsible for

- Where possible, avoid working at height.
- Undertaking an assessment of all tasks which could be classed as working at height.
- Ensure a Permit to Work (PTW) is in place where necessary through the My Compliance system.
- Determining and provision of the most appropriate access equipment.
- Consider weather conditions that could endanger health and safety.
- Plan for emergencies and rescue.
- Ensure staff carrying out the task are competent to use the equipment which will include correct assembly, and as appropriate fixing and securing.
- Provide collective protection measures (e.g. guard rails) priority over personal protection measures (e.g. safety harnesses).
- Ensuring that training is given to all staff using working at height equipment, which is appropriate to complexity of the equipment. For example, a stepladder or step stool could be by local demonstration by a manager or supervisor where a scaffold or access equipment will require formal training by the manufacturer or supplier.
- Ensuring the risk of falling objects is minimised whilst working at heights e.g. the fitting of toe boards and/or netting should be considered where appropriate.
- Implementing any actions identified from incidents.
- Ensuring that any fragile areas are adequately marked and made known to employees or others as appropriate.
- Ensuring that any system of access equipment in use for extended periods is subject to inspection by a competent person to ensure it remains safe, e.g. with scaffolding- weekly inspections.
- Ensuring access equipment is periodically examined even when not in use to ensure it is maintained in good condition.
- Maintaining a record of all ladders and steps within their work area and ensuring they are inspected at least once a year, and that a record of the inspection is kept.
- As necessary engaging specialist contractors where heights are considered beyond the capability of employees.

Employees

Any employee who is required to work at height will:

- Assisting with the assessment of risks as determined by the Line Managers.
- Complying with any safe system of work developed through risk assessment and any requirements of a permit to work.
- Using the appropriate access equipment in accordance with instruction/information and training provided.
- Using any safety equipment supplied.
- Informing their managers if they suspect that the system of work in place is ineffective or inadequate.
- Report any defects immediately to your manager or supervisor.
- Reporting any activity or defect likely to endanger safety.
- Make use of any equipment designed to prevent individuals falling or objects falling.
- Undertake training to ensure competency with use of any access equipment or system.
- Ensure equipment, subject to periodic maintenance programme, has been maintained before using it
- Reporting all incidents (including near misses) and any defects in equipment using the My Compliance electronic reporting system.
- Report any ill health that may permanently or temporarily affect working at heights.

- Report to management if they suspect they may not be fit enough to work at height.

Contractors

It will be accepted that the standards described within the policy will form part of any Contractor selection process.

All managers who are involved in engaging contractors or others, where working at height is part of the work, have a duty to ensure that the Contractor adopts the standards within this document.

As such Council employees are required to report contractor non-compliance to their Manager/Facilities Department (where relevant) or Health and Safety Team.

Contractors are responsible for providing their own access equipment that is maintained and in good working order.

Health and Safety Trade Union Representatives

Health and Safety / Trade Union Representatives have certain responsibilities and duties and are able to audit and complete inspections where required.

Health and safety representatives are fellow workers who represents other union members to look after the health and safety at work of people they work with.

Health and Safety Representatives have the right to:

- take an active part in workplace risk assessments.
- investigate potential hazards and 'dangerous occurrences' and examine the accident data.
- investigate members' complaints.
- carry out inspections of the workplace in work time, at least every three months.
- be consulted on new working practices and new technology.
- receive safety information from their employer (such as inspectors' reports, hygiene surveys and risk assessments).
- attend union-approved training courses without loss of pay; and have access to a phone and office equipment, and paid time off work, both to carry out inspections and to meet staff and other safety reps.

5.0 WORKING AT HEIGHT RISK ASSESSMENT

A risk assessment is a requirement of health and safety legislation. It is a careful examination of what could cause harm to people as a result of work activity. It will allow you to take the necessary precautions to prevent harm occurring. In a risk assessment you will need to:

- Look for the hazards.
- Decide who might be harmed and how (falling or something falling on someone nearby).
- Evaluate the risks and decide whether the existing precautions are adequate, or should more be done (do you need to provide additional equipment or training to reduce the risk).
- Record your findings.
- Review your assessments and revise it if necessary (if there are any changes, if the weather has worsened or there has been an accident).

In addition, any risk assessment for working at height should consider the following:

- All work at height is properly planned and appropriately supervised.

- Those working at height are competent.
- The place where work at height is done, is safe.
- The weather conditions are considered, and all work is stopped if weather conditions endanger health or safety.
- Distance and consequences of a fall.
- Duration and frequency of task.
- Equipment for work at height is suitable and properly inspected and maintained.
- Risk of use, installation and removal of equipment.
- Access and egress.
- The risks from fragile surfaces are properly controlled.
- Procedures in case of emergency are planned for.

Once a risk assessment has been conducted the working at height 'hierarchy of control' should then always be implemented.

A sensible approach should be adopted when considering precautions for work at height. There may be some low-risk situations where common sense tells you no particular precautions are necessary and the law recognises this.

There is a common misconception that ladders and stepladders are banned, but this is not the case. There are many situations where a ladder is the most suitable equipment for working at height.

6.0 HIERACHY OF CONTROL

Under Regulation 6 of the Work at Height Regulations, there is hierarchy of control for determining how to work at height safely. The hierarchy has to be followed systematically and only when one level is not reasonably practicable may the next level be considered. It is not acceptable to select work equipment from lower down the hierarchy (e.g. personal fall arrest, such as harnesses and lanyards) in the first instance. The hierarchy has three basic steps to consider, in order these are AVOID, PREVENT, MINIMISE.

It is the responsibility of the duty holder to:

- avoid working at height where it is reasonably practicable to do so.
- where working at height cannot be avoided, prevent falls using either an existing place of work that is already safe or the right type of equipment.
- minimise the distance and consequences of a fall, by using the right type of equipment where the risk cannot be eliminated.

Therefore always:

- Do as much work as possible from the ground.
- Ensure staff can get safely to and from where they work at height.
- Ensure equipment is suitable, stable and strong enough for the job, maintained and checked regularly.
- Make sure you don't overload or overreach when working at height.
- Take precautions when working on or near fragile surfaces.
- Provide protection from falling objects.
- Consider your emergency evacuation and rescue procedures.

It is not always necessary to implement all parts of the hierarchy, e.g. in the case of a fully boarded and guarded scaffold, workers would not be expected to wear personal fall arrest equipment in addition.

Rescue/Recovery

The law requires that when working at height, there also needs to be in place a plan for emergencies and rescue.

If a plan is necessary, a simulation must be undertaken to ensure that it is effective and highlights any changes needed.

Examples of when a rescue plan would be required:

- Working in a MEWP (i.e. cherry picker)
- Erection/dismantling of scaffolding

7.0 THE USE OF STEP LADDERS AND LADDERS

The main cause of all injuries from working at height is people falling from ladders. Ladder and stepladder use can be justified for low risk and short duration work providing the user has been trained and instructed in the selection and safe use of ladders, and systems are in place to ensure ladders are maintained and inspected.

Decisions and authorisation of the use of ladders must be made by a competent person who has risk assessed the situation.

When it is necessary to use ladders, precautions should normally be taken to prevent a leaning ladder slipping or falling (refer to HSE Guidance INDG455). The hierarchy of precautions in descending order of effectiveness is:

- Where possible, tie (or equally effective secure) the ladder at the top. If this is not reasonably practicable; then
- Tie it part way down (i.e. through a window), or at or near the foot; then
- Use an effective ladder stability device; then
- Wedge the ladder against a suitable fixed structure (e.g. a wall); then
- 'Foot it'. The best method of footing is by facing the ladder with feet on the bottom rung, each foot as far apart as possible on the rung (stile to stile), and both hands on the stiles. The person footing the ladder should remain in the position described until the person using the ladder has descended to at least the halfway point. The user and footer should not overload the ladder.

Step ladders and any ladders used must conform to Class 1 or BS EN 131. Domestic rated steps must not be used.

8.0 PERMIT TO WORK

A permit-to-work system is a formal written safe system of work used to control potentially high-risk work activities. It specifies the precautions that need to be taken to control the risks. Examples include working in confined spaces, ACM's, roof work, excavation work, electrical system work, and hot work.

Permit-to-work systems ensure that work can be carried out in a safe way and begin only after safe procedures have been defined and put in place.

Regarding Working at Height, all contractor roof work requires a PTW, this includes roof access to ensure their works are managed safely.

All permit to works must be raised and closed within the My Compliance system for contractors attending our premises to complete roof works.

9.0 TRAINING AIDS & FURTHER ADVICE

All staff who are required to work at height must be competent to carry out the task safely, staff who use ladders must receive training in the safe use and procedures.

The following guidance published by the HSE may be used towards providing suitable training.

Additional guidance and advice can be downloaded for free from the HSE website
<https://www.hse.gov.uk/work-at-height/index.htm>

10.0 MONITORING, AUDIT & REVIEW

The Health and Safety Team and the Health and Safety Trade Union Representatives will regularly monitor and review any incidents/accident that involve working at height to ensure that the provisions of this policy were implemented.

The line manager/supervisor will also provide adequate instruction and supervision to their staff to ensure safe working practices are followed, and review systems of work following incidents and near misses involving working at height.

Any member of staff with a concern regarding working at height tasks, should ensure that it is discussed with their supervisor or manager.

This policy will be reviewed as part of the regular reviews, unless changing circumstances require an earlier review.