Form Title: Health and safety policy
Form Ref: POL_001
Author: Adrian McDowell
Date: April 2025
Version: 1.0

Health and safety policy for NIS Group

Version Number	Purpose/Change	Author	Date
0.1	Draft from SWG	A.McDowell	February 2025
0.2	Arboricultoral Safety Various throughout	G.Talbot R.Cavanagh	March 2025
0.3	Various throughout from SWG	A.McDowell	March 2025
0.4	Amended SWG List	A.McDowell	March 2025

Contents

1. PLAN 4
1.1 Statement of intent 4
1.2 Organisation and structure 5
1.3 Responsibilities for Health and Safety 6
1.3.1 CEO's Responsibilities 6
1.3.2 Directors/Managers Responsibilities 7
1.3.3 Health and Safety Champions 8
1.3.4 Employees Responsibilities 8
1.4 Information, Instruction, Training and Competency 10
1.5 Health and Safety Advice 11
1.6 Communication and Consultation with Employees and Learners 12
1.6.1 Purpose of the Safety Working Group (SWG) 12
1.6.2 Safety Working Group 15
1.7 Health and Safety Management Plan (HSMP) 16
1.8 Health and Safety Board Report 17
2. DO 18
2.1 Risk management 18
2.2 Accidents, Incidents, Near Misses, Dangerous Occurrences and Ill-health Reporting 19
2.3 Abrasive Wheel Safety 20
2.24.1. Definition of a Major/Serious Incident 38
2.24.2 Incident Response Framework 38
3. CHECK 64
3.1 Accidents, Incidents and Near Misses Investigation 64
3.2 Accident and Incident Analysis 66
3.3 Internal Monitoring 67
3.4 Internal and External Auditing 68
3.4.1. Internal Health and Safety Audits 68
3.4.2. External Health and Safety Audits 69

3.5 Personal Injury Insurance Claims Management 70
4. ACT 71
4.1 Health and Safety Management System Review 71
4.1.1. Introduction 71
4.1.2. Policy and Objectives 71
4.1.3. Risk Assessment and Hazard Control 71
4.1.4. Legal and Regulatory Compliance 71
4.1.5. Training and Competency 71
4.1.6. Incident Reporting and Investigation 72
4.1.7. Emergency Preparedness and Response 72
4.1.8. Employee Engagement and Consultation 72
4.1.9. Performance Monitoring and Continuous Improvement 72
4.2 Reviewing Performance and Learning Lessons 72

1. PLAN

1.1 Statement of intent

NIS Group believes that Health and Safety is a vital component of the business. It is our belief, both morally and commercially, to have high standards of health and safety throughout the business - a good health record goes hand in hand with high productivity.

We aim to ensure, as far as reasonably practicable the health and safety of our employees, and third parties who may be affected by our work activities.

This statement of intent should be read in conjunction with the full health and safety policy which details the arrangements and responsibilities of our Health and Safety Management System (HSMS).

We are committed to:

- consult with our employees on matters affecting their health and safety,
- ensure safe handling and use of substances,
- ensure the availability of expert health and safety advice,
- implement emergency procedures, including evacuation in case of fire or other significant incidents,
- maintain safe and healthy working conditions,
- manage health and safety risks and
- provide adequate control of risks to employees and others arising from our work activities
- Paying particular health, safety and wellbeing of learners
- reduce accidents and cases of work-related ill health,
- provide adequate information, instruction, training and supervision for employees,
- provide and maintain safe plant and equipment,
- provide mandatory personal protective equipment to NIS Group employees, and monitor its use,
- provide the necessary resources to secure the above objectives.

Signed:

Role: Chief Executive Officer

Date: 01 April 2025

1.2 Organisation and structure

Organisations need to define the responsibilities and relationships, which promote a positive safety culture, and secure implementation and continued development of the safety policy. Structures and processes are required to:

- Establish and maintain management control within an organisation;
- Promote co-operation between individuals and groups so that safety becomes a collaborative effort
- Ensure the communication of necessary information throughout the organisation
- Secure the competence of employees.

NIS Group maintains control of its business by:

- Engaging and obtaining the commitment of its employees
- Allocation of safety responsibilities to all employees
- Sufficiently resourcing the organisation to manage safety
- The setting of standards for performance
- Monitoring performance, by inspections and audit
- Investigating incidents and implementing improvements to prevent recurrence

1.3 Responsibilities for Health and Safety

Overall and final responsibility for health and safety is that of:

David Carns, Chief Executive Officer of NIS Group Ltd.

Day-to-day responsibility for ensuring this policy is put into practice:

Adrian McDowell, Head of Health, Safety and Environment.

To ensure health and safety standards are maintained/improved, the following people have responsibility in the following areas:

Adrian McDowell	Workplace safety, support with risk assessments, consulting employees, investigating accidents, incidents and near misses, ensuring first aid compliance and reporting of work-related ill health.
Adrian McDowell	Lead on internal monitoring, developing emergency procedures, fire and evacuation plans.
Adrian McDowell	Oversee the planned preventive maintenance of plant and equipment, and provide information, and instruction to and the training of safety champions.

1.3.1 CEO's Responsibilities

- Ensure that NIS Group has appointed a nominated person for health and safety and has access to competent Health and Safety advice as required by the Management of Health and Safety at Work Regulations 1999,
- Ensure that there exists an effective policy for Health and Safety management, supplemented by additional documents and safe systems of work relating to the required performance in each area and type of activity and that this document is implemented throughout the business,
- To be involved with the development and signing of the health and safety policy statement,
- This policy is routinely reviewed as and when required to ensure the arrangements for Health and Safety remain current and valid,
- Ensure that necessary resources and information are made available for the policy to be effectively put into practice,
- that Line Managers are inducted and trained to enable them to carry out their role effectively,
- that Line Managers carry out their respective duties regarding Health and Safety within their areas of control,

- objectives and targets are set, and ensure that the results are reviewed, taking remedial actions where necessary,
- Ensure that all injuries, diseases and/or dangerous occurrences are reported to the Enforcing Authority where required by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013,
- Co-operate and assist, as necessary, with all enforcing authorities and any other external body concerned with Health and safety in the course of their duties.

1.3.2 Directors/Managers Responsibilities

- Co-operate with the CEO on Health and Safety matters,
- Ensure that the duties and responsibilities for safe working are properly assigned, accepted and understood by all personnel working in or entering the workplace,
- Ensure individuals tasked with producing risk assessment possess the required competency to undertake risk assessments within their area of responsibility,
- Budget for adequate workplace resources to fully implement the Health and Safety policy,
- Ensure that the health, safety and welfare arrangements within the workplace are effectively implemented in accordance with the specific procedures detailed in this policy and or the health and management system,
- Ensure that all recommendations from the risk assessments are implemented within the relevant timeframes,
- Ensure that all accidents and near misses are reported and investigated to determine if further controls are necessary to prevent a re-occurrence,
- Ensure that Health and Safety training is provided to all new workplace employees as part of NIS Group's overall training programme,
- Ensure that all employees within the workplace have been briefed on and understand the Health and Safety Policy along with any safe working systems/procedures relevant to their work,
- Ensure employees have access to all necessary and relevant information appertaining to their health, safety and wellbeing at work,
- Ensure that necessary protective clothing and equipment is correctly used and maintained in good order by employees under their control, and by any visitors and external contractors on-site.

1.3.3 Health and Safety Champions

To be able to improve health and safety across the organisation, NIS Group needs to build a strong working relationship with its employees - it is easier to achieve improvements if management and employees can work together in a constructive way and build mutual respect.

Safety champions carry out a vital role in this process, as they are able to:

- draw upon the views of the workforce about hazards at work and how they can best be controlled,
- mobilise the concerns workers feel about hazards,
- engage in a shared dialogue with management and safety professionals about risk management approaches,
- Undertake essential statutory functions, i.e. maintain the statutory compliance folders.

Safety champions have a good knowledge and understanding of the day-to-day tasks and activities being conducted within their area of responsibility including:

- the hazards and risks posed, and
- The appropriate control measures.

Safety champions are tasked with:

- Identification of and taking actions to rectify or escalate health and safety issues to line manager.
- Engaging the workforce in their health and safety responsibilities,
- checking that employees and the workplace is compliant with health and safety requirements,
- investigating and tackling hazards,
- working closely with other safety champions, the safety working group, and management.

1.3.4 Employees Responsibilities

- Co-operate with Line Managers and Directors on Health and Safety matters,
- Not interfere with or misuse anything provided to safeguard their Health and Safety,
- Take reasonable care of their own Health and Safety, and that of others,
- Use equipment and substances correctly, in accordance with training and instructions received,
- Use personal protective equipment correctly, in accordance with training and instructions received,
- Report all Health and Safety concerns to their Line Manager or Head of Service,

- Stop work and seek advice if they believe there is an imminent risk of injury to themselves or others,
- Report any accidents, incidents, near misses or dangerous occurrences immediately,
- Always assist in maintaining good housekeeping standards.

1.4 Information, Instruction, Training and Competency

NIS Group will provide information, instruction, training and supervision to employees in accordance with the general duties on employers under Section 2 of the Health and Safety at Work etc., Act 1974 and various regulations.

All new employees will receive an induction that includes:

- The company's commitment to safety,
- Staff handbook which includes and abridged version of the health and safety policy,
- Corporate structure and safety responsibilities,
- Emergency procedures (including fire),
- First aid arrangements,
- Reporting hazards, accidents, incidents, near misses or dangerous occurrences,
- Job specific risk assessments,
- Essential seven health and safety modules.

All employees will be provided with information on the significant findings of any risk assessments relevant to their particular activity/workplace. This will include information on the hazards and relevant control measures.

All information, instruction and training given to employees will be recorded on individual training records. In certain instances, employees will be asked to sign to confirm receipt and/or understanding.

Skills Knowledge Attitude Training Experience (SKATE)

Individuals tasked with leading or supervising health and safety tasks, such as the production of risk assessments, will require appropriate levels of SKATE, to undertake such tasks.

Training to maintain and enhance competence will be delivered following Safety Working Group meetings on a monthly basis. Sessions will include a competency assessment, and be lead by:

Adrian McDowell, Head of Health, Safety and Environment.

To demonstrate the company's commitment to delivering competent health and safety professionals, all safety champions will be required to complete a Level 3 Award in Health and Safety in the Workplace (RQF) along with maintaining a Continual Professional Development (CPD) record.

Induction training for all new employees is the responsibility of:

Adele Morris-Robinson, Head of People.

Level 3 Award in Health and Safety in the Workplace (RQF) is the responsibility of:

Adrian McDowell, Head of Health, Safety and Environment.

Training will be identified, arranged and monitored by:

Line Managers as part of the training needs analysis process

Training records are kept on:

Each employee's SafeHR profile and backed up on a central Personnel file, managed by:

Adele Morris-Robinson, Head of People.

The health and Safety Law poster is displayed on the:

Site Health, Safety and Welfare Board.

Responsibility for ensuring the safety of our employees and others who work at, locations under our control and are given relevant Health and Safety information is that of:

The employee's Line Manager.

1.5 Health and Safety Advice

NIS Group has access to competent Health and Safety advice.

Health and Safety advice is available from:

Smart Safety Solutions and PRB Consultancy (Rail specialists).

Consultant certificates are displayed on health and safety noticeboards.

In the event of a health and safety concern or query, in the first instance contact your:

Safety Champion and or Line Manager

1.6 Communication and Consultation with Employees and Learners

NIS Group will consult with its employees in accordance with the Safety Representative and Safety Committees Regulations 1977 and the Health and Safety (Consultation with Employees) Regulations 1996.

NIS Group employees can, and are encouraged to, report all accidents, incidents, near misses, dangerous occurrence or safety concerns they have to their Line Manager for appropriate action.

NIS Group employees will be notified when policies and procedures have been produced or updated, and where necessary they will be provided with any training that may be required.

Notification of production/updates to health and safety policies and procedures will be communicated via:

SafeHR automated notification emails to all staff.

Further internal communication takes place in relation to safety in the form of:

- The Safety Working Group (SWG),
- The Health and Safety Induction (employees and learners)
- Team Meetings,
- Toolbox Talk Type Sessions,
- Safety Bulletins and Spotlight on Safety (internal comms with MD),
- Health and Safety Law Poster,
- Dedicated and Managed Safety Notice Boards,
- Employees Consultation Process.

Safety information comes into the organisation from a number of sources, including:

- Health and Safety Executive (HSE),
- Office for Road and Rail (ORR),
- Sentinel,
- National Skills Academy for Rail (NSAR),
- Office for Standards in Education (Ofsted),
- Health and Safety Publications,
- Competent Health and Safety Consultant(s).

1.6.1 Purpose of the Safety Working Group (SWG)

The Health and Safety Working Group is a consultative Committee and reports to NIS Group's Senior Management Team (SMT),

It is also recognised that the remit of the Safety Working Group extends beyond staff into health and safety issues affecting learners, clients, visitors and contractors and links will therefore need to be made with other Committees as appropriate.

The Safety Working Group's purpose is:

- To lead in and set the standard expected of the company in the management of health and safety,
- To create and maintain staff engagement in health and safety, and to involve staff at all levels where possible,
- To identify hazards, risks and controls in the workplace to reduce accidents, incidents, injury and ill health,
- To develop, endorse, promote and review the NIS Group's Health and Safety Policy aims and objectives,
- To support the safety champions during the implementation phase of the health and safety policy,
- To promote the ownership of health and safety as an integral part of the provision of high-quality training, advice and consultancy,
- To ensure that the appropriate level of competence in health and safety is identified, supported and maintained,
- To monitor health and safety performance and strive for continual improvement, both in the operational service and at a corporate level,
- To provided assurance to SMT that systems are in place to effectively manage health and safety,
- To meet on a monthly basis using a standing agenda as agreed.

NIS Group safety working group is made up of the following **Safety Champions** and **nominated deputies**:

Head Office:	***Adele Morris-Robinson*** ***Candice Roberts (Deputy)***
Abercynon Ty Menter – Business in Focus (Wales):	***Aaran Hewitt***
Aston - Cuckoo Wharf	***Richard Beaver***
Aston – TRIA	***Andy Holtom***
BCIMO, Very Light Rail National Innovation Centre:	***Paul Fleming***
City of Wolverhampton College:	***Wayne Hardman***
Coventry Radio Plus:	***Dave Ferguson***
Coventrians RUFC:	***Cliff Murdoch***
Halesowen:	***Craig Skeldon***
IQA Team:	***Chris Carnegie***
Mere Green House:	***Siobhán Griffin***
NIS Consultancy:	***Joe Watton***
NIS Digital:	***Sarah Hope***
Strategic Contract:	***Richard Thomas-Robinson***

1.6.2 Safety Working Group

1.7 Health and Safety Management Plan (HSMP)

The HSMP is a safety compliance tool used by the company to assist in the identification, delivery and monitoring of all statutory health and safety requirements (legislation, ACOP, and Guidance).

The HSMP has been created by the SWG, it will be reviewed and updated on a monthly basis during the SWG meetings, with performance communicated to the SMT.

The responsibility to maintain and monitor the corporate HSMP for NIS Group ltd is that of:

Adrian McDowell, Head of Health, Safety and Environment

Below is an example of our HSMP for 2025, please note this will obviously change due to updates and amendments throughout the calendar year. (The example below will remain within this policy as a reference only).

NIS Group Ltd. Health & Safety Management Plan 2025

Criteria	February	March	April	May	June	July	August	September	October	November	December
H&S Management Plan	20/2/25										
Health & Safety Support Visits	20/2/25	18/3/25									
H&S Board Report											
Health & Safety Policy	Development & Implementation										
Health & Safety Management System (HSMS)	Development & Implementation										
Safety Working Group	20/2/25	18/3/25									
Site Safety Inspection & Statutory Compliance											
Health & Safety Consultation						Staff Consultation					
Staff Training & Development (SKATE): - H&S Induction (corporate / job specific etc) - Safety Champions IOSH - Fire Marshal - First Aid - Essential 7			Needs Analysis & Matrix (HR)								
Staff Health Surveillance (As and When Identified)	None										
Risk Assessments	20/2/25	Confirm Corporate Index	Development & Implementation								
Safe Systems of Work					Development & Implementation						
Dangerous Substances & Explosive Atmospheres		Internal Review									
Fire Safety Strategy											
Fire Risk Assessments											
Fire Logbooks											
Control of Hazardous Substances (COSHH)					Site Index	Complete COSHH Assessments					
Legionella Risk Assessment											
Legionella Logbook (L8)											
Manual Handling Operations											
Noise Management											
Vibration Management											
Display Screen Equipment (DSE)										DSE Assessments & Analysis	
Emergency Action Plan (EAP)											
Asbestos Surveys & Management Plans											
Fixed Electrical Installations (FEI)											
Portable Appliance Testing (PAT)											
Plant & Equipment Servicing (PPM)								Development & Implementation			
Lifting Operations & Lifting Equipment (LOLER)			ROTE & Service						ROTE & Service		
Gas Safety			Annual Gas Safe								
Pressurisation Units			Annual Service								
Vehicle Management											
Pedestrianisation											
Local Exhaust Ventilation											
Contractor & Sub Contractor Management											
Safety Signs & Signals											
Hazard Reporting	None										
Accident, Incident & Near Miss Analysis	20/2/25										
H&S Audit											Annual Audit
HSE / EHO / Enforcement Visits	None										

1.8 Health and Safety Board Report

The health and safety board report will be presented to NIS Group's Senior Management Team (SMT) on a quarterly basis by:

Adrian McDowell, Head of Health, Safety and Environment.

The structure of the report is as follows:

- Executive Summary,
- Health and Safety Performance Overview,
- Incident Analysis,
- Regulatory Compliance,
- Health and Safety Initiatives,
- Recommendations and Action Plan,
- Conclusion.

2. DO

2.1 Risk management

In accordance with the Management of Health and Safety at Work Regulations 1999, NIS Group will carry out risk assessments of all activities that present a risk to employees or others. These risk assessments will be carried out in line with Health and Safety Executive guidance, and the procedure for doing so is as follows:

- Identify the significant hazards involved in our activity.
- Decide who might be harmed and how.
- Evaluate the level of risk and decide if existing precautions are sufficient, or if more needs to be done.
- Record the significant findings of the assessment.
- Review the assessment when things change, or there is reason to believe that it is no longer valid.

Risk assessments will be undertaken by:

Safety Champion along with a relevant competent person(s).

Approval for the required action to remove or control risks will be given by:

Adrian McDowell, Head of Health, Safety and Environment.

Risk management is a step-by-step process for controlling health and safety risks caused by hazards in the workplace.

A risk assessment is simply a careful examination of what, in the workplace, could cause harm to people, so a competent person can weigh up whether enough precautions are in place or what further measures can be taken to prevent harm.

The HSE provide a simple five step approach to conducting risk assessments as follows:

- Identify hazards
- Assess the risks
- Control the risks
- Record your findings
- Review the controls

2.2 Accidents, Incidents, Near Misses, Dangerous Occurrences and Ill-health Reporting

NIS Group is committed to preventing Accidents, Incidents, Near Misses, Dangerous Occurrences and cases of ill-health to employees and others who may be affected by our work activities.

However, NIS Group recognises that failures can occur and will investigate all of the above to identify the immediate and underlying causes so as to prevent recurrence.

Initial reporting of such incidents identified by staff, must be done using the QR code displayed at each venue (safety notice board).

All reportable incidents, as defined by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) will be reported to the enforcing authority within the relevant timeframes.

Responsibility for reporting under RIDDOR to the enforcing authority is that of:

***Adrian McDowell, Head of Health, Safety and Environment*.**

2.3 Abrasive Wheel Safety

NIS Group will ensure the safe use of abrasive wheels in the workplace, in compliance with HSG17 Safety in the use of abrasive wheels, and the Provision and Use of Work Equipment Regulations 1998 (PUWER) and relevant HSE guidance.

NIS Group is responsible for identifying hazards/risks associated with the use of abrasive wheels in the workplace, and the introduction of suitable control measures to reduce the risk of harm.

NIS Group are responsible for ensuring that all employees and learners, using abrasive wheels are competent, to use such equipment. Training is delivered via face-to-face sessions and a competency assessment

Employees and learners will be provided with suitable personal protective equipment (PPE) to be worn whilst using an abrasive wheel.

Trainers will monitor the correct use of abrasive wheels, wearing of PPE and ensure regular equipment checks and inspections take place.

Where identified by a risk assessment, an adequate safety procedure ((Safe System of Work (SSOW)/ task brief within the rail industry) has been developed to support staff and reduce the risk of injury.

The responsibility for ensuring checks, inspections and servicing records are maintained, available and in accordance with manufacturer's instructions is that of:

Safety Champion along with a relevant competent person(s).

2.4 Alcohol and Drugs

As a responsible employer, NIS Group recognises the need to take measures to eliminate the effects of alcohol and drugs on employees/learners in the workplace.

Alcohol and drug consumption/dependency affects individual health and work performance in terms of safety, efficiency, productivity and attendance.

NIS Group takes a zero-tolerance approach, be it through the consumption, possession or sale of alcohol and drugs.

To ensure a working environment that is free from the effects of alcohol and drugs, NIS Group will take appropriate steps to:

- Comply with applicable industry/educational requirements,
- Encourage employees who suspect or know they have an alcohol or drug-related problem to seek help voluntarily, and provide assistance to these employees to overcome their problem,
- To reduce the personal suffering of employees with alcohol or drug-related problems and their dependents,
- To provide practical guidance on how to deal with alcohol or drug-related problems effectively,
- To promote a climate which will reduce the tendency to conceal or deny alcohol or drug-related problems by enhancing awareness; and to provide a supportive framework for employees who come forward with an alcohol and drugs dependency issue.

For those NIS Group employees and sub-contractors working within the transport, rail and infrastructure sectors (including training), will comply with the requirements of the **Transport and Works Act 1992, Rail Industry Standard RIS-8070-TOM** and the relevant **Network Rail standards (NR/L2/OHS/00120)**

Any person found breaking these rules will be isolated from the work activity and the appropriate disciplinary action taken up to and including dismissal,

Where there are grounds to suspect that the use of alcohol or drugs by a person led to an accident/incident, appropriate detection measures will be utilised to detect the abuse of alcohol or drugs.

Responsibility for conducting Alcohol, Drugs and Medical assessments is that of:

***Gaynor Walsh, Medical Technician*.**

2.5 Arboricultoral Safety

As a responsible employer, NIS Group will implement measures to protect employees involved with Arboriculture and Forestry work.

Initial guidance will be sought from the Arboriculture and Forestry Advisory Group (AFAG) - an advisory group of the Health and Safety Executives (HSE's) Agriculture Industry Advisory Committee (AIAC).

In addition to AFAG's recommendations, NIS Group will adhere to the safety standards and best practices outlined by the Forestry Industry Safety Accord (FISA).

FISA sets the benchmark for health and safety within the forestry and vegetation management sectors, particularly for operations involving heavy machinery, felling, and large-scale vegetation clearance.

By combining the technical guidance from AFAG with the operational standards set by FISA, NIS Group will create a comprehensive safety framework that covers both arboriculture and forestry work.

Through risk assessments, training and ongoing monitoring, NIS Group will foster a culture of safety, ensuring that employees are equipped with the knowledge and resources to work confidently and securely in all arboricultural and forestry environments.

Where identified by a risk assessment, an adequate safety procedure ((Safe System of Work (SSOW)/ task brief within the rail industry) has been developed to support staff and reduce the risk of injury.

Competence of contractors will be assessed by:

Graham Talbot, Operations Director.

Any safety issues arising from the activities of contractors should be reported to:

Safety Champion along with Graham Talbot, Operations Director.

Risks assessments will be carried out by:

Safety Champion along with Graham Talbot, Operations Director.

2.6 Asbestos Management

NIS Group recognises its responsibility under the Control of Asbestos Regulations 2012 and will take steps to identify the presence of asbestos in our workplaces and, if so, assess any hazards/risks posed by asbestos:

- We will implement any plan to manage that risk,
- We will provide relevant information to employees and others who may come into contact with asbestos (for example, building contractors),
- We will keep records of asbestos inspections as per the management plans.

Responsibility for ensuring asbestos surveys and management plans are in place:

Adrian McDowell, Head of Health, Safety and Environment.

NIS Group is aware of Asbestos Containing Materials (ACM) at the following locations:

- Head Office (84 Salop Street), The landlords has an Asbestos Management Survey and Register in place. ACMs are clearly labelled,
- Mere Green House, NIS Group are the landlords, and as such have undertaken an Asbestos Management Survey and Register. ACMs are clearly labelled.

2.7 Construction, Design and Management (CDM)

The Construction (Design and Management) Regulations 2015 place specific duties upon clients, principal designers and designers, principal contractors and contractors, and workers to develop their approach to health and safety so that it is taken into account and then coordinated and managed effectively throughout all stages of a construction project.

Contractors and the workers under their control are most at risk of injury and ill health from construction work. NIS Group understands its important role in planning, managing and monitoring work to ensure any risks are controlled.

NIS Group will, where required conduct its due diligence when appointing a principal contractor for any works it engages in that falls under CDM regulations.

Responsibility for ensuring compliance for of CDM regulations are that of:

Adrian McDowell, Head of Health, Safety and Environment, and the assigned NIS Project leader.

2.8 Contractor and Sub-Contractor Management

NIS Group recognises that it owes a duty of care to contractors as well as employees, as stipulated by the Health and Safety at Work etc. Act (HSWA) 1974 Section 3 and the Management of Health and Safety at Work Regulations 1999.

In the first instance, NIS Group will ensure that only competent contractors are selected. From then on, the activities of appointed contractors will be adequately managed.

All contractors will be selected from the appropriate competent contractor scheme for their trade. Every contractor will be required to provide Risk Assessments and Method Statements (RAMS), for the work activities taking place (RAMS may require review and update based on current conditions).

It is the responsibility of NIS Group (Safety Champion and competent person) to review and authorise any RAMS provided, prior to any work commencing.

RAMS will be requested from contractors/sub-contractors one calendar month prior to the scheduled works commencing.

Where high-risk activities have identified the need for a permit to work, these will be reflected within the RAMS; NIS Group will have the responsibility for the issuing, reviewing and closing off of permits to work.

NIS Group will conduct an evaluation of contractor/sub-contractor suitability at least one calendar in advance of any works being procured.

Competence of contractors/sub-contractors will be assessed by:

Safety Champion and Graham Talbot, Operations Director

All contractors/sub-contractors 'Risk Assessments and Method Statements (RAMS) will be sent to:

Safety Champion and Graham Talbot, Operations Director

Contractors/sub-contractors working on site will be managed by:

Safety Champion and Graham Talbot, Operations Director

Responsibility for issuing permits to work are that of:

Safety Champion and Graham Talbot, Operations Director

Any problems/hazards arising from the activities of contractors/sub-contractors should be reported to:

Safety Champion and Graham Talbot, Operations Director

Information on site hazards/controls/safety rules will be provided to contractors/sub-contractors by:

Safety Champion and Graham Talbot, Operations Director

2.9 Control of Pesticides

In accordance with the Official Controls (Plant Protection Products) Regulations 2020, NIS Group will ensure that pesticides do not harm employees, contractors (including sub-contractors), the public, or have unacceptable effects on the environment by:

- Following and complying with the regulation,
- Only using authorised products,
- Using products in a sustainable fashion,
- Monitoring the impact of chemicals used.

This includes registering with the Competent Authority. This is the Department for Environment, Food & Rural Affairs (Defra) in England and the Scottish and Welsh Governments in Scotland and Wales. (Defra will collect this information on behalf of Scottish and Welsh Governments).

Responsibility for registering the business with the relevant authority by:

Graham Talbot, Operations Director.

2.10 Control of Substances Hazardous to Health (COSHH)

NIS Group will assess and control health risks from exposure to hazardous substances in accordance with the Control of Substances Hazardous to Health to Health (COSHH) Regulations 2002.

NIS Group Ltd will obtain Safety Data Sheets (SDS) from manufacturers/suppliers in advance of any hazardous substance being used within the workplace.

COSHH assessments will be completed using the SDS for all hazardous substances in the workplace, and the findings will be shared with relevant employees and learners

Employees and learners are not allowed to bring in hazardous substances from home or purchase such locally. All substances must be procured through NIS Purchasing, only using approved suppliers.

Where identified by a risk assessment, an adequate safety procedure ((Safe System of Work (SSOW)/ task brief within the rail industry) has been developed to support staff and reduce the risk of injury.

Training and awareness on hazardous substances, emphasising good housekeeping practices and hazard awareness will be provided at induction.

Chemical Safety Data Sheets are obtained from the manufacturer/supplier by:

The individual(s) requesting the product.

Chemical Safety Data Sheets are stored in:

The Health and Safety Management System files, and in the COSHH folder within the site's relevant chemical store.

COSHH assessments will be carried out by:

Adrian McDowell, Head of Health, Safety and Environment.

Approval for the required action to remove or control risks will be given by:

Adrian McDowell, Head of Health, Safety and Environment.

2.11 Dangerous Substances and Explosive Atmosphere Regulations (DSEAR)

The Dangerous Substances and Explosive Atmosphere regulations 2002 (DSEAR) puts duties on the employers to protect people, including members of the public, from the risks of fire, explosion and corrosion of metal as a result of work activity.

NIS Group accepts its responsibilities under DSEAR and will keep an up to date and accurate register of all dangerous substances, (solvents, paints, varnishes, flammable gases, dusts, pressurised gases and substances corrosive to metal).

NIS Group will:

- Risk assess all dangerous substances,
- Put control measures in place to either remove those risks or, where this is not possible, control them,
- Prepare plans and procedures to deal with accidents, incidents and emergencies involving dangerous substances,
- Make sure employees are properly informed about and trained to control or deal with the risks from the dangerous substances,
- Identify and classify areas of the workplace where explosive atmospheres may occur and avoid ignition source in those areas.

Where identified by a risk assessment, an adequate safety procedure ((Safe System of Work (SSOW)/ task brief within the rail industry) has been developed to support staff and reduce the risk of injury.

Responsibility for conducting DSEAR risk assessments:

Competent external contractor/sub-contractor/DSEAR safety specialist

Responsibility for maintaining on site DSEAR Register:

The site's designated safety champion.

2.12 Dealing with Emergencies (Emergency Action Plan)

Under the Management of Health and Safety at Work Regulations 1999, NIS Group Ltd have a responsibility to manage all foreseeable emergencies, and as such develop and implement EAPs across all venues.

Each site has its own EAP which are presented onsite.

Quick and effective action may ease an emergency situation and reduce the consequences. In emergencies employees are more likely to respond reliably if they are:

- well trained and competent
- Take part in regular and realistic practice
- Have clearly agreed, recorded and rehearsed plans, actions and responsibilities.

Where NIS Group Ltd share our workplace with another employer, we will consider the coordination of emergency.

NIS Group will have in place procedures to follow in the event of emergency. These will be communicated to all employees at induction and will be tested on a regular basis.

Responsibility for ensuring the fire risk assessment is undertaken and completed is that of:

A competent fire risk assessor

Approval for the required action to remove or control risks will be given by:

Adrian McDowell, Head of Health, Safety and Environment.

2.13 Display Screen Equipment (DSE)

NIS Group will assess and control health risks from exposure to display screen equipment in accordance with the Health and Safety (Display Screen Equipment) Regulations 1992.

Employees that are classed as habitual Display Screen Equipment users are entitled to free eye tests, and vision correction appliances where these are only need for work with display screen equipment.

Training and awareness on display screen equipment, emphasising good housekeeping practices and slip and trip prevention, will be provided at induction.

All identified users will be requested to complete a workstation and user self-assessment, findings will be reviewed and actioned by:

Adrian McDowell, Head of Health, Safety and Environment.

2.14 Electricity at Work

NIS Group will ensure that electrical installations and electrical appliances are suitable and without risks to Health and Safety, in accordance with the Electricity at Work Regulations 1989.

All employees and learners are required to carry out a visual check of any equipment prior to use. In some cases, this check will need to be documented. NIS Group will advise when this is the case.

Training and awareness on safe use of electrical equipment, emphasising good housekeeping practices and pre-use checks, will be provided at induction.

The fixed electrical installation is tested every five years by:

A competent electrical contractor

Portable electrical appliances are tested every 12 months by:

A competent electrical contractor

2.15 Enforcement

Normally, if an Inspector would like to visit they will contact the company beforehand. But it is worth remembering that the HSE (or EHO) Inspectors have powers to inspect workplaces as they see fit and they can appear unannounced.

Where expected or unexpected, if an HSE inspector appears and wants to carry out an inspection, the following action should be taken:

Contact the General Manager. If they are not aware of the visit. They will be able to liaise with the inspector on behalf of KSCL and initiate action as appropriate.

Do not attempt to deceive the inspector or prevent him/her having access to various areas (unless of course there are strict health and safety reasons why the area cannot be entered.

The inspector is legally entitled to enter any area and can, if required, call on the services of the police to gain entry.

Provide information (both verbal and written) as requested. The inspector is legally entitled to ask for any information they require as part of their investigations, including written documentation.

Make notes as part of the investigation and ensure that any items highlighted by the inspector and noted. If not present, provide SMART Safety Solutions (Health and Safety Consultants) with a short report of the visit and any actions that need to be completed.

2.16 Fire Safety Management

The Regulatory Reform (Fire Safety) Order 2005 (FSO) is the main piece of legislation governing fire safety in buildings in England and Wales.

NIS Group Ltd as the responsible employer must carry out a fire risk assessment of all owned premises, and obtain a copy of the fire risk assessment from landlords of premises occupied, and not owned by NIS Group Ltd.

Fire risk assessments will be completed by:

A competent fire risk assessor.

On completion of fire risk assessments, actions highlighted will be reviewed and completed with a priority-based approach, i.e. High, medium and low.

Fire risk assessments will be reviewed as and when deemed not valid, bi-annually or annually where there is significant risk of fire/explosion.

NIS Group Ltd will have in place procedures to follow in the event of a fire breaking out. These will be communicated to all employees on induction and will be tested on a regular basis.

Venue specific emergency procedures have been developed to include the action that should be taken in the event of a fire.

Approval for the required action to remove or control risks will be given by:

Adrian McDowell, Head of Health, Safety and Environment

Training and awareness on workplace fire safety, emphasising good housekeeping practices, will be provided at induction.

The fire alarm will be tested by/every:

The site's designated safety champion, every week

Fire alarm is serviced by/every:

A competent fire safety engineer, every six months

Emergency lighting will be tested by/every:

The site's designated safety champion, every month

Emergency lighting is serviced by/every:

A competent fire safety engineer, every 12 months (battery discharge test)

Fire extinguishers are checked by/every:

The site's designated safety champion, every week

Fire extinguishers are serviced by/every:

A competent fire safety engineer, every 12 months

Emergency evacuation will be tested:

Every six months / annually as a minimum.

2.17 First Aid at Work

NIS Group recognises its responsibilities under the Health and Safety at Work Act 1974 and regulations made under it to protect the health, safety and welfare of its employees, clients, service users, contractors and other lawful visitors, so far as is reasonably practicable.

The Health and Safety (First Aid) Regulations 1981 require employers to provide adequate and appropriate equipment, facilities and personnel to ensure that their employees receive immediate attention if they are injured or taken ill at work.

NIS Group will follow the Health and Safety Executive's recommendation to include non-employees, (clients, service users, etc.) within the scope of provision.

First Aid Needs and Provision Risk Assessments will be conducted to ensure that the appropriate level(s) of first aid provision is available, proportionate to the risks associated with the working environment and its associated work activities.

NIS Group ltd will provide the following first aid arrangements as a minimum standard:

- **A suitably stocked first aid kits:**
    - ***All our first aid kits conform to BS 8599-1,***
    - ***The size of the first aid kit reflects the number of employees and learners onsite,***
- **Trained first aid staff:**
    - ***Designated office employees will be trained in Emergency First Aid at Work,***
    - ***Health and Safety trainers (Phase 1) will be trained in First Aid at Work,***
    - ***Civils and Utility, Plant and Rail trainers will be trained in First Aid at Work with Catastrophic Bleeding.***

First Aid Needs Assessments will be conducted by:

Adrian M^{c}Dowell, Head of Health, Safety and Environment.

2.18 Gas Safety

NIS Group acknowledges and accepts its responsibilities regarding gas safety under the Gas Safety (Installation and Use) Regulations 1998.

The Gas Safety (Installation and Use) Regulations 1998 set out the requirements

for landlords to inspect and service gas installations annually.

NIS Group will only allow qualified, approved and registered gas safe engineers to work on any gas appliances or installations.

Gas safety is applicable to all premises owned by NIS Group Ltd, the procedure details the approach to the control of risk from:

- Gas leaks,
- fire, and
- explosions.

The management of gas safe certification is the responsibility of:

The safety champion, or the competent person.

2.19 Hazard Reporting

NIS Group is committed to maintaining a safe and healthy working environment for all our stakeholders (employees, learners, contractors, and visitors). To achieve this, NIS Group ltd encourage and expect all stakeholders to actively participate in identifying and reporting workplace hazards.

All employees and learners have a duty to report any potential hazards, unsafe conditions, or unsafe behaviours as soon as they are identified.

Initial reporting of hazards identified, must be done using the QR code displayed at each venue (safety notice board).

The responsibility to ensure that all reported hazards are assessed and addressed in a timely and effective manner, with appropriate corrective actions taken to eliminate or reduce risks is that of:

Adrian McDowell, Head of Health, Safety and Environment.

NIS Group Ltd will actively encourage employees and learners to report potential hazards. No employee or learner will face discrimination or retaliation for reporting health and safety concerns in good faith. By working together to identify and control hazards, we can create a safer workplace for everyone.

2.20 Hybrid Working

NIS Group recognises the benefits of being flexible and recognises that employees' individual circumstances may differ.

NIS Group allows employees to divide their time between attending the office and working remotely.

It is NIS Group's view that the introduction of a hybrid working model increases staff motivation, reduces employee stress, improves employee performance and productivity; as well as encouraging staff retention by offering greater flexibility as to where employees work.

Hybrid workers are employees who, in part, and with the agreement of NIS Group, split their time between home or remote working and attending the office for the purpose of carrying out their job duties.

In order to enable the hybrid worker to work from home, NIS Group will provide employees with designated items of office equipment: including a laptop, laptop stand, external keyboard and mouse.

When working at home, employees have the same health and safety duties as other staff, and must:

- take reasonable care of their own health and safety and that of anyone else who might be affected by your actions and omissions,
- must attend our usual health and safety courses and undertake to use equipment safely.
- identify any potential health and safety hazards in the home and take appropriate steps to minimise risk, we retain the right to carry out a health and safety risk assessment (either remotely or by arranging a home visit) before or shortly after employees begin homeworking or at any other time during their employment on reasonable notice. NIS Group will contact employees to arrange completion of the risk assessment. The need for these inspections will depend on the circumstances, including the nature of the work undertake,
- not have meetings in their home with customers or give customers their
- home address or telephone number,
- ensure that their working patterns and levels of work when working at home
- are not detrimental to their health and wellbeing. If they have concerns about their health or wellbeing arising as a result of their workload or working pattern, they should inform their line manager without delay so that NIS Group can discuss measures to take action,
- use their knowledge, experience and training to identify and report any health and safety concerns to their line manager.

Employees will receive DSE User awareness training at induction and complete a DSE User self-assessment. Where significant issues are highlighted on the self-assessment, a DSE risk assessment will be conducted.

A self-assessment checklist and guidance will be provided for individuals working from home. The checklist and guidance will help employees consider the following aspects for the space being used for home working:

- DSE home risk assessment,
- Temperature,
- Lighting,
- Ventilation,
- Fire,
- Fire warning systems,
- Housekeeping,
- Space,
- Electrical installations,
- Medical issues,
- GDPR,
- Work-related stress,
- Domestic abuse,
- Work distractions (i.e. pets, and children).

Responsibility for enrolling employees on DSE User Awareness training at induction is that of:

Adele Morris-Robinson, Head of People.

All identified users will be requested to complete a workstation and user self-assessment, findings will be reviewed and actioned by:

Adrian McDowell, Head of Health, Safety and Environment.

2.21 Legionella Management

NIS Group will assess and control health risks from exposure to hazardous substances in accordance with the Control of Substances Hazardous to Health (COSHH) Regulations 2002.

NIS Group acknowledges its responsibility to prevent the growth of legionella bacteria in water systems in accordance with the **HSE's 'Approved Code of Practice (L8) – Legionnaires Disease: The Control of Legionella Bacteria in Water Systems'**.

NIS Group, where directly responsible for premises, will implement the following arrangements:

- Assessment of Legionnaires' disease risk and preparation of a scheme preventing or controlling the risk is to be conducted by a competent contractor,
- Appointment of a nominated competent person as a 'Responsible Person' within NIS Group and responsibility for day-to-day implementation of the universal precautions and testing specified in the HSE's ACOP and any specific precautions specified in the risk assessment,

The management of records for all applicable maintenance and testing regimes, (whether NIS Group or a third party are the landlord) are held, together with a copy of the risk assessment and details of the competent contractor, by:

The site's designated safety champion

Legionella Awareness training will be provided for safety champions and line managers of sites where legionella risks assessments identify the need for planned preventative measures. The following course has been identified to meet these needs: HSQE Legionella Awareness.

Monitoring to check records and confirm that the precautions have been implemented, by:

Adrian McDowell, Head of Health, Safety and Environment.

2.22 Lifting Operations and Lifting Equipment

NIS Group will ensure that all lifting operations and lifting equipment is suitable and without risks to Health and Safety, in accordance with legislation such as the Provision and Use or Work Equipment Regulations (PUWER)1998, the Lifting Operations and Lifting Equipment Regulations (LOLER) 1998 and the Electricity at Work Regulations 1989.

All employees are required to carry out a visual check of any equipment before it is used. In some cases, this check will need to be documented. NIS Group will advise when this is the case.

Report of Thorough Examination (ROTE) is a systematic and detailed examination of the equipment and safety critical parts carried out a specified intervals by a competent person. The report must contain the information detailed by LOLER. The ROTE will normally be completed by the insurance company.

Equipment Servicing is any process that includes maintenance to keep a business's equipment in reliable working order.

Where identified by a risk assessment, an adequate lifting plan has been developed to support staff and reduce the risk of injury.

Responsibility for identifying all lifting operations and lifting equipment needing maintenance is that of:

Internal competent individual within NIS holding suitable experience.

Responsibility for ensuring that all identified maintenance is implemented is that of:

Adrian McDowell, Head of Health, Safety and Environment.

Any problems with lifting operations or lifting equipment should be reported to:

Adrian McDowell, Head of Health, Safety and Environment.

Responsibility for checking that new lifting operations, and lifting equipment meets Health and Safety standards is that of:

Adrian McDowell, Head of Health, Safety and Environment, with support from the Internal competent individual within NIS holding suitable experience.

2.23 Lone Working and Personal Safety

NIS Group recognises that it owes a duty of care to Lone and remote workers, as stipulated by the Management of Health and Safety at Work Regulations 1999.

Lone and Remote Working by definition is unsupervised or with only limited direct support and monitoring including home working.

Where lone or remote workers are identified a Lone and Remote working risk assessment has been undertaken and the necessary control measures to reduce the risk to an acceptable level have been identified and implemented.

Where identified by a risk assessment, an adequate safety procedure ((Safe System of Work (SSOW)/ task brief within the rail industry) has been developed to support staff and reduce the risk of injury.

Lone and Remote working risk assessments will be carried out by:

***Safety Champion and Line Manager, with support from Adrian McDowell, Head of Health, Safety and Environment*.**

Approval for the required action to remove or control risks will be given by:

***Adrian McDowell, Head of Health, Safety and Environment*.**

2.24 Major / Serious Incident Management

At NIS Group we are committed to ensuring the health, safety, and well-being of all employees, visitors, and stakeholders. In the event of a major or serious incident, we have established a robust incident management framework to respond swiftly and effectively, minimising harm and disruption.

2.24.1. Definition of a Major/Serious Incident

A major or serious incident is any event that poses a significant risk to life, health, property, or the environment. This may include, but is not limited to:

- Fatalities or life-threatening injuries,
- Major fires, explosions, or structural failures,
- Chemical spills or hazardous material incidents,
- Serious workplace violence or security threats,
- Large-scale environmental hazards,
- Public health emergencies (e.g., pandemics).

2.24.2 Incident Response Framework

Our response to major incidents follows a structured approach:

- Immediate Action & Emergency Response:
  - Activate emergency procedures, including evacuation if necessary.
  - Alert emergency services (999) and internal response teams.
  - Provide first aid and medical support.
- Incident Management Team (IMT):
  - A designated team, including senior management and health & safety officers, will lead the response.
  - Responsibilities include coordination with emergency services, assessing risks, and implementing mitigation strategies.
- Communication & Stakeholder Engagement:
  - Ensure timely and accurate communication with employees, regulators, emergency responders, and the public as needed.
  - Designate a spokesperson to manage media inquiries.
- Investigation & Root Cause Analysis:
  - Conduct a thorough investigation to determine the cause of the incident.
  - Gather witness statements, review safety protocols, and document findings.
- Corrective & Preventative Actions:
  - Implement necessary changes to prevent recurrence, including policy updates, training, or infrastructure improvements.

- Review and revise the Health & Safety Risk Assessment as needed.

- Post-Incident Review & Continuous Improvement:
  - Conduct a debrief session with all relevant parties.
  - Identify lessons learned and update emergency response plans accordingly.
  - Provide support for affected employees, including counselling services if necessary.

Incident response flowchart:

2.25 Manual Handling Operations

In accordance with the Manual Handling Operations Regulations (MHOR) 1992, NIS Group will eliminate the need for manual handling where possible. Where elimination is not possible, the risks from manual handling will be assessed and reduced, so far as is reasonably practicable.

A risk assessment has been conducted for all manual handling tasks following the HSE five-steps to a risk assessment.

Where significant risk of injury has been identified, a TILE assessment has been conducted. A TILE assessment focusing on four key elements:

- **Task,**
- **Individual,**
- **Load,**
- **Environment.**

Where identified by a risk assessment, an adequate safety procedure ((Safe System of Work (SSOW)/ task brief within the rail industry) has been developed to support staff and reduce the risk of injury.

Training and awareness on safe manual handling within the workplace will be provided at induction.

Manual handling risk assessments will be carried out by:

***Safety Champion and Line Manager, with support from Adrian McDowell, Head of Health, Safety and Environment*.**

Approval for the required action to remove or control risks will be given by:

***Adrian McDowell, Head of Health, Safety and Environment*.**

2.26 New and Expectant Mothers

NIS Group are committed to ensuring the health, safety, and welfare of all employees, including new and expectant mothers, accepting its responsibility to comply with the Managing Health and Safety at Work Regulations 1999 and Equality Act 2010 in its assessment and management of new/expectant mothers.

We recognise the potential risks that pregnancy and maternity may present in the workplace and will take all reasonable steps to safeguard the health of both the mother and the unborn or newborn child.

To achieve this, we will:

- Conduct risk assessments to identify and mitigate potential workplace hazards for new and expectant mothers.
- Implement necessary adjustments or modifications to duties, working conditions, or working hours where required,
- Provide suitable facilities for rest and, where applicable, breastfeeding.
- Ensure that employees are aware of their rights and encourage them to inform management as soon as possible about their pregnancy to allow for appropriate support and risk management,
- Offer flexible working arrangements where possible to accommodate medical needs and maternity-related concerns.

The responsibility for conducting a person specific new and expectant mothers risk assessment is the responsibility of:

The immediate line manager with support from Adrian McDowell, Head of Health. Safety and Environment

The responsibility for reviewing new and expectant mothers risk assessments, and ensuring that they are implemented is the responsibility of:

Adrian McDowell, Head of Health, Safety and Environment.

2.27 Noise at Work

NIS Group is committed to protecting the health, safety, and well-being of all employees by managing workplace noise exposure in accordance with the Control of Noise at Work Regulations 2005.

To achieve this, we will:

- **Assess and Monitor Noise Levels** – Conduct regular risk assessments to identify areas where noise levels may pose a risk to health.
- **Implement Control Measures** – Reduce noise exposure at the source where possible, using engineering controls, quieter equipment, or alternative work methods.
- **Provide Hearing Protection** – Ensure employees have access to appropriate hearing protection when noise levels exceed legal limits.
- **Training and Awareness** – Educate employees on the risks of noise exposure and proper use of protective equipment.
- **Health Surveillance** – Offer hearing checks for employees exposed to high noise levels to detect any early signs of hearing damage.
- **Compliance and Continuous Improvement** – Regularly review and update noise management strategies to ensure ongoing compliance with legal requirements and best practices.

All employees have a responsibility to follow noise control measures and wear hearing protection where required. Any concerns about workplace noise should be reported to management immediately.

The responsibility for conducting a noise risk assessment is the responsibility of:

The immediate line manager with support from Adrian McDowell, Head of Health. Safety and Environment

The responsibility for reviewing noise risk assessments, and ensuring that they are implemented is the responsibility of:

Adrian McDowell, Head of Health, Safety and Environment.

2.28 Occupational Diseases

NIS Group is committed to protecting the health and well-being of all employees by minimising the risk of occupational diseases, including those caused by biological agents such as waterborne viruses. Occupational diseases are chronic health conditions or disorders that develop due to exposure to workplace hazards or tasks, examples include:

- Hearing loss
- Asthma
- Infections, and
- Some cancers

To achieve this, we will:

- Identify and assess occupational health risks associated with workplace exposure to infectious agents, including bacteria, viruses, and other pathogens.
- Implement appropriate control measures, including hygiene protocols, personal protective equipment (PPE), and engineering controls to prevent exposure.
- Ensure that water sources, including drinking water and workplace sanitation facilities, meet health and safety standards to prevent contamination and disease transmission.
- Provide training and education to employees on recognising symptoms, preventing exposure, and responding to potential outbreaks of occupational diseases.
- Establish reporting and monitoring procedures to track occupational illnesses and take corrective actions as needed.
- Comply with all relevant health and safety regulations and guidelines related to occupational diseases and waterborne pathogens.

By adhering to these principles, NIS Group aims to create a safe and healthy work environment, reducing the risk of occupational diseases and protecting our employees' well-being. We have access to occupational health services in:

Thandie Mandimutsira, Tylah Health & Wellness, 36 Merton Way, Walsall, England, WS2 9HG, admin@tylahhealth.co.uk, 01922 662 263.

National Health Alerts

In the event of an epidemic or pandemic alert, NIS Group will organise the business and operations and provide advice on steps to be taken by Staff, to reduce the risk of infection at work as far as possible. This may include hygiene, social distancing and ventilation measures. We will work in accordance with official government guidance.

2.29 Office Safety

NIS Group is committed to maintaining a safe and healthy office environment for all employees, visitors, and contractors. We recognise that office-based work presents its own set of risks, including ergonomic concerns, fire hazards, electrical safety, and slip/trip hazards.

To ensure a safe workplace, we will:

- Aim to provide and maintain a clean, organised, and hazard-free office environment
- Conduct regular risk assessments and office safety inspections,
- Ensure that all office equipment, furniture, and electrical appliances are safe and properly maintained,
- Promote good ergonomic practices and provide necessary workstation adjustments,
- Implement clear emergency procedures, including fire safety and first aid provisions,
- Encourage employees to report hazards and safety concerns promptly,
- Provide training and information on office safety best practices.

All employees have a responsibility to follow safety guidelines, use equipment correctly, and report any safety issues. By working together, we can create a safe and productive office environment.

Responsibility for ensuring office safety is maintained is that of:

***The safety champion and line manager*.**

Any problems (e.g. defects/loss etc.) with office equipment should be reported to:

***Adele Morris-Robinson, Head of People*.**

2.30 Personal Protective Equipment (PPE)

NIS Group is committed to complying with the Personal Protective Equipment (PPE) at Work Regulations 1992.

Wherever possible, risks will be controlled by means other than PPE, however, it is recognised that PPE is sometimes the only practical control measure, and at other times it is required in addition to other control measures.

Employees and learners will be required to sign to confirm receipt of PPE.

PPE will be selected by:

Adrian McDowell, Head of Health, Safety and Environment.

PPE will be issued to employees by:

Adele Morris-Robinson, Head of People.

PPE will be issued to learners by:

Craig Skeldon, Health and Safety Trainer

Any problems (e.g. defects/loss etc.) with employee PPE should be reported to:

Adele Morris-Robinson, Head of People.

Any problems (e.g. defects/loss etc.) with learner PPE should be reported to:

Craig Skeldon, Health and Safety Trainer

Responsibility for checking, maintaining, cleaning and storing PPE is that of:

The individual issued with the PPE.

Responsibility for enforcing the mandatory wearing of employee PPE is that of:

The safety champion and line manager.

Responsibility for enforcing the mandatory wearing of learner PPE is that of:

The designated trainer.

2.31 Pressure Systems Safety Management

NIS Group is committed to ensuring the safe operation, inspection, and maintenance of all pressure systems used within our premises. Our goal is to comply with all relevant health and safety legislation, including the Pressure Systems Safety Regulations (PSSR) 2000, to prevent accidents, injuries, or hazardous releases due to pressure system failures.

To achieve this, we will:

- **Risk Assessment & Compliance**: Identify, assess, and manage risks associated with pressure systems, ensuring compliance with legal and industry standards.
- **Written Scheme of Examination (WSE)**: Implement and maintain a Written Scheme of Examination for applicable pressure systems, with inspections carried out by competent persons.
- **Routine Maintenance & Monitoring**: Ensure regular maintenance, testing, and monitoring of pressure vessels, pipework, and safety devices.
- **Training & Competency**: Provide employees with adequate training and information on the safe operation and handling of pressure systems.
- **Incident Reporting & Emergency Response**: Establish clear procedures for reporting faults, leaks, or failures, and ensure that emergency response measures are in place.
- **Continuous Improvement**: Regularly review and update policies and procedures to enhance safety performance and comply with regulatory changes.

All employees and contractors working with or near pressure systems must adhere to these safety measures. Managers and supervisors are responsible for enforcing compliance and ensuring best practices in pressure systems management.

Report of Thorough Examination (ROTE) is a systematic and detailed examination of the equipment and safety critical parts carried out a specified intervals by a competent person. The report must contain the information detailed by LOLER. The ROTE will normally be completed by the insurance company.

Equipment Servicing is any process that includes maintenance to keep a business's equipment in reliable working order.

The responsibility for conducting a Pressure Systems risk assessment is the responsibility of:

The immediate line manager with support from Adrian McDowell, Head of Health. Safety and Environment

The responsibility for reviewing Pressure Systems assessments, and ensuring that they are implemented is the responsibility of:

Adrian McDowell, Head of Health, Safety and Environment.

2.32 Railway and other Guided Transport Systems Safety

At NIS Group we are committed to ensuring the highest standards of safety for all employees, learners and third parties involved in the operation, maintenance, and use of railway and other guided transport systems. Our goal is to prevent accidents, injuries, and ill-health by implementing rigorous safety management practices in compliance with relevant legislation, industry best practices, and regulatory requirements

We will comply with all applicable railway safety laws, including the Railways and Other Guided Transport Systems (Safety) Regulations (ROGS) and other relevant national and international standards.

We will provide comprehensive training to all employees, and learners ensuring they are competent in their roles and aware of safety protocols, emergency procedures, and risk mitigation strategies.

NIS Group Lead for rail safety is:

Dave Hersey, Technical Director

2.33 Safety Signs and Signals

NIS Group is committed to ensuring a safe and healthy working environment for all employees, contractors, and visitors. As part of this commitment, we adhere to the proper use of safety signs and signals to minimise risks and enhance workplace safety.

We will ensure that our safety signs and signals:

- Provide clear instructions and warnings about hazards,
- Reduce the risk of accidents and injuries,
- Ensure compliance with legal safety standards.

The responsibility for ensuring that appropriate safety signs and signals are installed, maintained, and comply with relevant health and safety laws is that of:

Adrian McDowell, Head of Health, Safety and Environment.

Regular inspections to ensure that signs remain visible, legible, and in good condition will be conducted by:

The site's designated safety champion.

2.34 Shared Premises

In premises shared with other organisations, NIS Group recognises the importance of cooperation to ensure the health, safety, and welfare of all occupants.

We will work collaboratively with co-tenants, building management, and relevant authorities to identify and control risks, implement shared safety measures, and communicate effectively on health and safety matters.

Each organisation will be responsible for the safety of its employees, visitors, and operations while contributing to collective safety obligations, such as fire safety, emergency procedures, and shared facility maintenance.

Regular joint safety meetings and risk assessments will be conducted to uphold compliance with health and safety regulations.

Where we share or lease space with another organisation or from a landlord, we will enter into a formal agreement. The agreement will cover the following key elements:

Clearly Identify the Parties Involved:

- The landlord (property owner or main leaseholder).
- The primary occupier (tenant with the main lease).
- The secondary occupier (the party sharing the space).

Premises Description that Clearly defines:

- The area being shared (e.g., specific rooms, common areas).
- Any exclusive-use areas versus shared-use areas.

Contract Duration & Termination Specifying:

- The length of the agreement (fixed-term or rolling).
- Termination notice periods for either party.
- Conditions under which the agreement can be terminated early.

Details on Rent & Other Payments:

- Rent amount and payment schedule.
- Additional costs such as utilities, internet, cleaning, and maintenance.
- Deposit requirements, if any.

Outline Use of Premises:

- Permitted business or personal use.
- Operating hours and access restrictions.
- Any compliance requirements (e.g., zoning laws, licensing).

Define Responsibilities:

- Clearly defined safety responsibilities between all parties,
- Who is responsible for maintenance, repairs, and insurance.
- Cleaning obligations and shared space upkeep.

- Liability for damages caused by either party.

Dispute Resolution, Establishing:

- A process for resolving disputes (e.g., mediation or arbitration).
- Steps for addressing breaches of the agreement.

Indemnity & Liability Cover Requirements:

- Who is responsible for injuries, accidents, or property damage.
- Insurance requirements (e.g., liability coverage).

State Rules on Modifications & Improvements:

- Whether the shared occupant can make modifications.
- Who bears the cost of improvements or repairs.

Confidentiality & Security, Considering:

- Restrictions on sharing confidential business information.
- Security and access control measures (e.g., key cards, security codes).

The responsibility for shared premises agreements is that of:

Richard Thomas-Robinson, Head of Strategic Contracts

2.35 Slips and Trips

NIS Group is committed to ensuring a safe working environment by minimising the risk of slips, trips, and falls in the workplace. Slips and trips are a major cause of workplace injuries and can result in serious harm.

We recognise our responsibility to identify, assess, and control hazards that may contribute to such incidents.

Regular visual inspections in the workplace for hazards such as wet floors, uneven surfaces, loose cables, poor lighting, and cluttered walkways will be conducted by:

***The site's designated safety champion*.**

Employees and learners to report any hazards immediately (see hazard reporting) and ensure all slip and trip incidents are investigated to prevent reoccurrence to:

***The site's designated safety champion*.**

Training and awareness on slip and trip prevention, emphasising good housekeeping practices and hazard awareness will be provided at induction.

2.36 Statutory Compliance

NIS Group is committed to maintaining a safe and healthy working environment for all its employees, contractors, and visitors. We recognise our statutory duties under the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999, and all other relevant health and safety legislation.

In order to ensure statutory compliance, NIS Group will implement and maintain a Health and Safety Management Plan (HSMP).

Along with the HSMP, NIS Group Ltd will maintain a Legal Register. The legal register is a comprehensive listing of legislation in force, relevant to health & safety and environment health at the date of issue.

Legal Register

This list contains the more significant and recent Acts and Regulations relating to:

- Health and Safety,
- Environmental/pollution control,
- Waste disposal.

Statutory compliance will be discussed as a standing agenda item on the monthly safety working group meetings.

Statutory compliance documentation will be held both locally and centrally, the responsibility for the management of local statutory compliance is that of:

***The site safety champion*.**

2.37 Stress and Mental Health at Work

NIS Group recognises that Stress and Mental Health at Work can have serious consequences on both individual health and business performance.

There are six main areas that can lead to work related stress if they are not managed properly, these are:

1. Demands
2. Control
3. Support
4. Relationships
5. Role
6. Change

We are dedicated to identifying and managing the risk of stress within the workplace, ensuring that work demands, working conditions, and other factors are properly assessed and appropriately controlled.

We will:

- Assess the risks of work-related stress regularly and take appropriate steps to reduce or eliminate identified risks,
- Provide a supportive work environment where employees feel safe to express concerns about stress-related issues without fear of retribution,
- Offer guidance, training, and support to managers to ensure they can recognise signs of stress and take appropriate action,
- Encourage an open dialogue between employees and management to prevent stress from becoming a significant issue,
- Promote a work-life balance and provide reasonable adjustments for employees who are at risk of work-related stress,
- Regularly review policies and practices to ensure that they continue to reflect best practices in managing work-related stress.

We believe that managing work-related stress is an integral part of a positive and productive work environment and will continue to invest in resources and initiatives to support our staff in maintaining good mental health.

NIS Group will provide Mental Health First aiders as an initial step to assist employees experiencing stress and mental health at work.

NIS Group's Mental Health First Aiders can be found on the health, safety and welfare noticeboards on each of our sites.

NIS Group, via BUPA offer an employee assistance programme (EAP) which is an employee benefit that provides our team with support and practical advice on issues that might be impacting their wellbeing and performance.

The EAP generally includes face-to-face, telephone or online counselling and expert support on both personal and work-related issues, with the aim of increasing staff wellbeing and productivity, as well as reducing absences.

NIS Group will monitor the health effects of its employees (and learners where identified by risk assessment) through our occupational health services in:

Thandie Mandimutsira, Tylah Health & Wellness, 36 Merton Way, Walsall, England, WS2 9HG, admin@tylahhealth.co.uk, 01922 662 263.

2.38 Vehicle Management and Movement (inc. driving for work and pedestrianisation)

NIS Group recognises that managing vehicles and the movement of vehicles (including driving for work and pedestrianisation) remains one of the most common causes of serious injury and death at work. The legislation and obligations associated with driving are aimed at promoting road safety.

Some employees operate company owned, leased, rental or personal vehicles as part of their jobs. Employees are expected to operate vehicles safely to prevent accidents which may result in injuries and property loss.

It is the policy of NIS Group to provide and maintain a safe working environment to protect our employees and the public of the communities where we conduct business from injury and property loss.

The company considers the use of automobiles part of the working environment. The company is committed to promoting a heightened level of safety awareness and responsible driving behaviour in its employees. Our efforts and the commitment of employees will prevent vehicle accidents and reduce personal injury and property loss claims.

The implementation of this procedure requires the full cooperation of each driver to operate their vehicle safely. Each driver must adhere to their safety responsibilities, this may include:

- Assigning responsibilities at all levels of employment.
- Vehicle use and insurance requirements.
- Employee driver's license checks and identification of high-risk drivers.

- Accident reporting and investigation
- Company Accident Review Board
- Vehicle selection and maintenance.
- Training standards
- Safety regulations.

Responsibility

NIS Group is responsible for the implementation and on-going execution of this procedure. Supervisors and employees are responsible for meeting and maintaining these standards.

Scope

This procedure applies to employees who operate vehicles on company business and will be reviewed by managers and supervisors to ensure full implementation and compliance.

Vehicle Movements in the Workplace

Workplace transport is any activity involving vehicles used in a workplace. To manage workplace transport effectively.

At NIS Group there are three key areas we have considered when undertaking our risk assessment, these are:

- Safe site
- Safe vehicle
- Safe driver.

Safe Site (segregation)

A well-designed and maintained site with suitable segregation of vehicles and people will make workplace transport accidents less likely. The most effective way of ensuring pedestrians and vehicles move safely around a workplace is to provide separate pedestrian and vehicle traffic routes.

Circumstances might mean that complete segregation is not possible, so clearly marked pedestrian and vehicle traffic routes, using measures such as barriers/signs will be needed. There should be separate entrances and exits for vehicles and pedestrians, and vision panels should be installed on doors that open onto vehicle traffic routes.

Where pedestrian and vehicle traffic routes cross, they should be clearly marked using measures such as dropped kerbs, barriers, deterrent paving etc, to help direct pedestrians to the appropriate crossing points.

Visibility

Visibility should be good enough for drivers to see hazards, and pedestrians to see vehicles. Adequate visibility for drivers is related to vehicle speed and the distance needed to stop or change direction safely.

Speed

Reducing vehicle speed is an important part of workplace transport safety. Fixed traffic control measures such as speed humps, chicanes and 'rumble' strips can reduce vehicle speed. It is important we select the most appropriate control as the wrong measure can increase risk by, for example, reducing vehicle stability. Speed limits can also be used, but they need to be appropriate, properly enforced and, where possible, consistent across the workplace.

Signs, Signals and Markings

Signs for drivers and pedestrians in a workplace should be the same as those used on public roads wherever a suitable sign exists. They should be well positioned and kept clean. Where driving is likely to be carried out in the dark, illuminated or reflective signs should be used.

White road markings should be used to regulate traffic flow, and yellow markings should be used for parking.

Wherever possible, such markings should be reflective and maintained regularly.

Coupling and Uncoupling

Drivers and those who have overall control of workplaces should make sure that coupling and uncoupling areas are well lit, with firm and level surfaces. Drivers should be properly trained and have their work monitored by their Line Manager to make sure they follow a safe system of work, involving the use of trailer and tractor unit parking brakes as appropriate.

Loading and Unloading

To minimise the risks to those involved in loading and unloading, information will be provided on the nature of the load and how it should be properly loaded, secured and unloaded. This information should accompany the load and be available to those involved in the loading, transportation and unloading activities.

Throughout loading and unloading there should be a safe place where drivers can wait. Drivers should be monitored to ensure they follow Safe Systems of Work. NIS Group will take measures to prevent vehicles being driven off during either loading or unloading at loading bays. These include:

- Vehicle or trailer restraints
- Keeping keys in a safe place, e.g. with a 'custody' system.

Safe Vehicle

Vehicles used in the workplace should be suitable for the purpose for which they are used.

The working environment in which a specific vehicle will be used and the suitability of that vehicle for the people using it has been considered. Consulting with those who will use it is a key part of developing a vehicle specification.

Warning devices such as rotating beacons and reversing alarms are often fitted, and conspicuous painting and marking may be used to make a vehicle stand out to pedestrians.

Drivers should be able to see clearly around their vehicle, measures such as CCTV and special mirrors where visibility is restricted have been considered.

Maintenance

Vehicles will be maintained in a good working order, so they remain mechanically sound, and any devices, such as flashing beacons, function properly.

Vehicles such as lift trucks and those with tail lifts will be thoroughly examined by a competent person and reports kept.

Planned inspections are a vital part of preventative maintenance. These may include daily safety checks carried out by drivers and regular maintenance inspections based on time or mileage.

Drivers will be provided with a list of the daily checks to be signed off at the start of each shift (if applicable). This should be monitored to ensure the checks are carried out properly.

Safe Driver

Drivers will be competent to operate a vehicle safely and receive appropriate information, instruction and training for the vehicle they use. It is particularly important that younger or less experienced drivers are closely monitored following their training to ensure they work safely.

Where identified by a risk assessment, an adequate safety procedure ((Safe System of Work (SSOW)/ task brief within the rail industry) has been developed to support staff and reduce the risk of injury.

The responsibility for checking employees have a current full driving licence will be managed by:

Adele Morris-Robinson, Head of People

Responsibility for ensuring the Vehicle Management and Movement (inc. driving for work and pedestrianisation) risk assessment is undertaken and completed is that of:

***Adrian McDowell, Head of Health, Safety and Environment*.**

2.39 Vibration at Work

NIS Group is committed to protecting the health and safety of all employees by identifying and managing the risks associated with exposure to vibration in the workplace. In accordance with the Control of Vibration at Work Regulations 2005, we are dedicated to:

- Assessing the Risk,
- Reducing Exposure,
- Health Surveillance,
- Training and Information,
- Monitoring and Review,
- Employee Involvement.

The following items of equipment are used by NIS Group employees, trainers and learners:

Cobra TT and impact wrench used at BCIMO, Aston TRIA, East Coast College and Wales.

Where identified by a risk assessment, an adequate safety procedure (Safe System of Work (SSOW)/ task brief within the rail industry) has been developed to support staff and reduce the risk of injury.

NIS Group will monitor the health effects of its employees (and learners where identified by risk assessment) through our occupational health services in:

Thandie Mandimutsira, Tylah Health & Wellness, 36 Merton Way, Walsall, England, WS2 9HG, admin@tylahhealth.co.uk, 01922 662 263.

2.40 Water Safety Management

Water hazards are present in many workplaces, from ditches, ponds, lakes, streams, canals and rivers, as well as flooding. The biggest risk to our employees is obviously that of drowning, and we recognise that not all workers can swim.

The Health and Safety at Work Act 1974 applies most situations of work on or near water, and therefore there is a duty on employers to protect employees and non-employees who could be at risk. Management of Health and Safety at Work Regulations 1999 requires risk assessments to be made for those working on or near water.

In addition to the above regulations, regulation 26 of the Construction (Design and Management) Regulations 2015 (CDM 2015) places a duty of care to prevent drowning.

Along with the risk of drowning, slips, trips and falls, fast currents and waves can lead to accidental immersion or submersion in water. This can lead to:

- Cold water shock,
- Impact with submerged and / or floating debris, and
- Hypothermia

As well as the above risks, serious illnesses can be caused by waterborne contaminants such as:

- Blue green algae,
- Leptospirosis,
- Clostridium tetani (the bacteria that causes Tetanus),
- Toxic-cyanobacteria,
- Chemical pollution,
- Sewage / animal droppings.

Where NIS Group employees are working near water suitable rescue equipment will always be available on site, as detailed in the rescue plan.

Those working on or near water will be given the appropriate water safety training in line with the **Department for Environment, Food and Rural Affairs (Defra) Flood Rescue Concept of Operations (FRCO) November 2019.**

The responsibility for conducting water safety risk assessments is that of:

Adrian McDowell, Head of Health, Safety and Environment.

Water safety training will be delivered by:

Adrian McDowell, Head of Health, Safety and Environment.

2.41 Work Equipment (Plant and Machinery)

NIS Group will ensure that all plant and equipment is suitable and without risks to Health and Safety, in accordance with the Provision and Use or Work Equipment Regulations (PUWER)1998.

All employees are required to carry out a visual check of any equipment before it is used. In some cases, this check will need to be documented. NIS Group will advise when this is the case.

NIS group are committed to preventing accidents, injuries, and ill-health associated with plant and machinery use by implementing robust safety procedures as follows:

- Ensure all plant and machinery are suitable for their intended use and comply with legal requirements.
- Conduct risk assessments to identify potential hazards and implement control measures.
- Provide appropriate training and supervision to employees and learners operating machinery.
- Maintain and inspect equipment regularly to ensure safe operation.
- Conduct routine inspections and servicing in line with manufacturer guidelines.
- Keep a faults and maintenance log for each piece of machinery.
- Ensure defective equipment is taken out of service until repairs are completed.
- Provide employees and learners with suitable and sufficient PPE, and enforce its use.

Report of Thorough Examination (ROTE) is a systematic and detailed examination of the equipment and safety critical parts carried out a specified intervals by a competent person. The report must contain the information detailed by LOLER. The ROTE will normally be completed by the insurance company.

Equipment Servicing is any process that includes maintenance to keep a business's equipment in reliable working order.

Where identified by a risk assessment, an adequate safety procedure ((Safe System of Work (SSOW)/ task brief within the rail industry) has been developed to support staff and reduce the risk of injury.

The following are some examples of work equipment used by NIS Group:

Office Equipment

- Computers & laptops
- Printers & scanners
- Telephones & headsets
- Desks & ergonomic chairs
- Filing cabinets

Construction Equipment

- Excavators
- Dumper
- Hammer
- Ladders & scaffolding
- Power drills
- Ride on Roller
- Saw
- Screwdriver

Rail Industry Equipment

- Rail saw
- Impact wench
- Iron man
- Tamper
- Track trolley
- Welding machines?

Healthcare Equipment

- Audiometer
- Stethoscopes
- Blood pressure monitors

Responsibility for identifying all work equipment needing maintenance is that of:

***Safety Champion and Line Manager*.**

Responsibility for ensuring that all identified maintenance is implemented is that of:

***Safety Champion and Line Manager*.**

Any problems with work equipment should be reported to:

***Safety Champion and Line Manager*.**

Responsibility for checking that new work equipment meets Health and Safety standards before it is purchased is that of:

***The individual(s) requesting the product*.**

2.42 Working at Height

NIS Group recognises that working at height presents a significant risk of injury, and as such, we are fully committed to complying with the Work at Height Regulations 2005.

These regulations require employers to prevent, or if that is not reasonably practicable, minimise the risks associated with working at height.

Where access equipment, such as scaffolding, mobile access towers, and Mobile Elevating Platforms (MEWPS) are used, specific training will be provided to users of this equipment. The erection and dismantling of such equipment will be conducted by competent individuals holding the necessary permits, for example CISRS, IPAF, PASMA.

Where ladders or stepladders are required for short duration work (30 minutes or less), staff will be provided with safe use of ladder training.

Where identified by a risk assessment, an adequate safety procedure ((Safe System of Work (SSOW)/ task brief within the rail industry) has been developed to support staff and reduce the risk of injury.

Before any work at height is undertaken a risk assessment will be conducted by:

The site's designated safety champion, with the support of Adrian McDowell, Head of Health, Safety and Environment.

All employees required to work at height will receive adequate training and instruction on how to carry out their work safely. The responsibility for training of staff is that of:

Adrian McDowell, Head of Health, Safety and Environment.

2.43 Working Time Management

NIS Group recognises its responsibility to prevent fatigue, stress, and other work-related health issues that could arise from excessive working hours. In accordance with the Working Time Regulations 1998 and relevant health and safety legislation.

As part of our commitment, we will:

- **Adhere to Legal Limits:** We will ensure that employees are not required to work more than the legal maximum weekly hours, which is 48 hours averaged over 17 weeks, unless they have voluntarily agreed to opt out of this limit.
- **Rest Periods**: We will ensure that employees are provided with adequate rest breaks, including:
    - A minimum daily rest period of 11 consecutive hours between shifts.
    - A 20-minute break if the employee works for more than six hours.
    - A minimum of one rest day per week (or two rest days every two weeks).
- **Night Work**: We will manage night work to ensure that employees working during night shifts receive appropriate rest and are not subjected to excessive hours. Special consideration will be given to employees working at night, ensuring that their health and safety are not compromised.
- **Work Schedules**: Work schedules will be planned in advance and reviewed regularly to avoid excessive overtime and ensure a reasonable workload. Any necessary overtime will be voluntary and appropriately managed to avoid employee fatigue.
- **Employee Well-Being**: We recognise that employees may experience health and safety risks due to long working hours. We will monitor working hours and provide support through regular assessments to ensure that work schedules do not negatively impact employees' health.
- **Training and Awareness**: All employees will be made aware of the working time regulations, their rights under the policy, and the importance of reporting any concerns regarding excessive working hours or fatigue to their line manager or the HR department.
- **Review and Compliance**: We will regularly review our processes to ensure compliance with the Health and Safety at Work Act 1974, Working Time Regulations 1998, and any other applicable regulations, ensuring continuous improvement in managing working time for the health and safety of employees.

Responsibility for ensuring adherence to working time directives is that of:

***The line manager*.**

Any problems with contracts or adherence with working time directives should be reported to:

Adele Morris-Robinson, Head of People.

2.44 Workplaces and Welfare

NIS Group is committed to providing suitable and sufficient welfare facilities to employees, in accordance with the Workplace (Health, Safety and Welfare) Regulations 1992.

Adequate numbers of toilets and washing facilities are provided for the number of staff required to use them. Toilet paper, soap and means for drying hands will always be available.

2.45 Young Persons and Work Experience

NIS Group will ensure that all young workers are adequately protected from risks to their health and safety while they are in the workplace.

Before any young person commences work experience or employment, a specific risk assessment will be conducted to identify potential risks in the workplace.

Young people will not be assigned to any work that is deemed to be too hazardous or inappropriate for their age, maturity, or ability.

Adequate training and supervision will be provided to all young workers, including specific instructions on health and safety practices relevant to their role.

Young people will be supervised at all times while at work, with close monitoring to ensure they are following health and safety procedures.

The responsibility for conducting young person's risk assessments is that of:

Adrian McDowell, Head of Health, Safety and Environment.

Supervision of young persons will be the responsibility of:

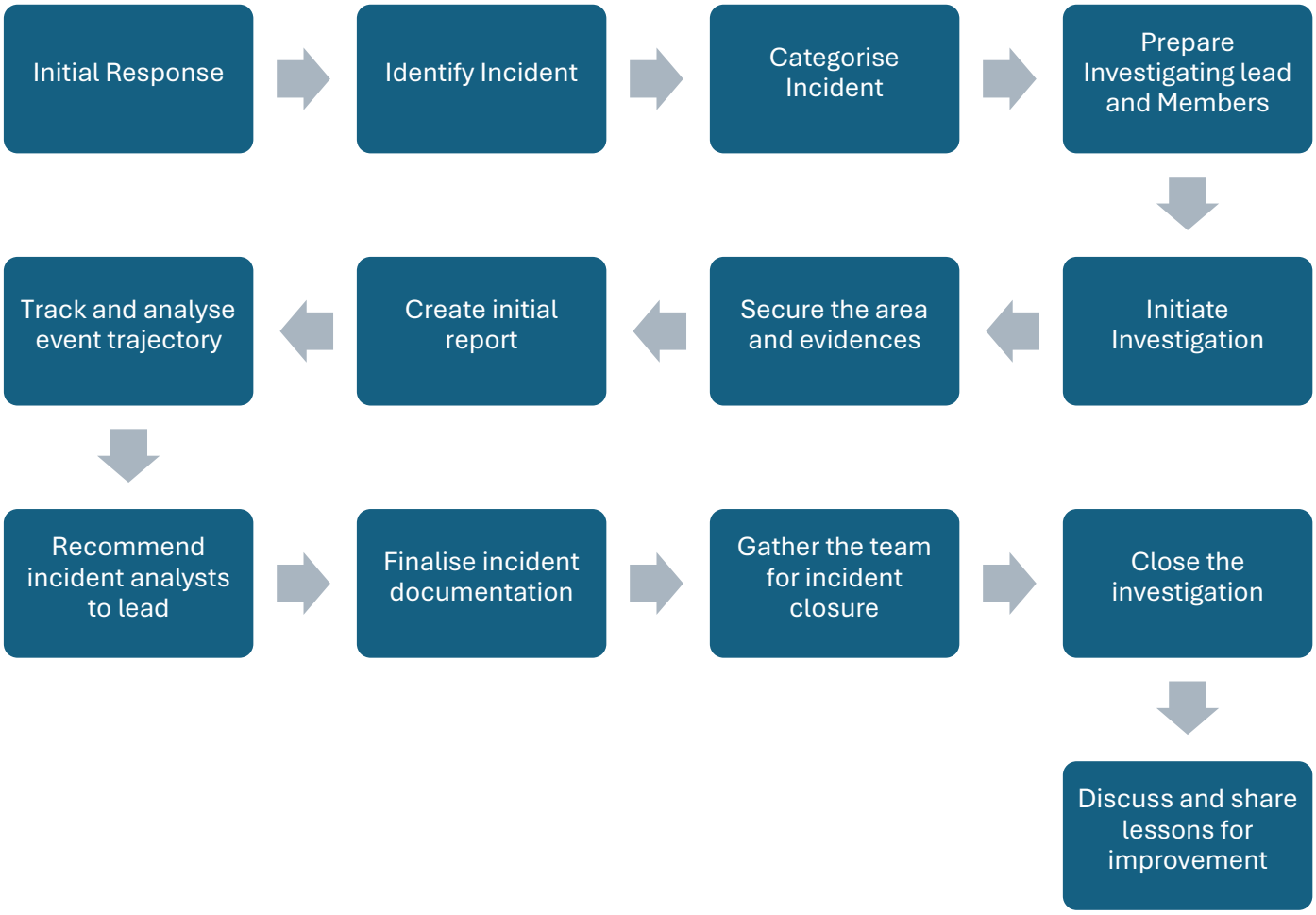
The immediate line manager.

3. CHECK

3.1 Accidents, Incidents and Near Misses Investigation

In the event of any accidents, work-related incidents, or near misses an immediate and thorough investigation will be conducted to determine the root cause and to ensure appropriate corrective actions are taken.

The investigation process is as follows:



- Initial Response: After an accident or incident occurs, the immediate priority will be to ensure the safety and well-being of those involved. First aid or medical attention should be administered as necessary.
- Identify Incident:
- Categorise Incident:
- Prepare investigating lead and members:
- Initiate Investigation: A full investigation will be carried out as soon as possible. The investigation will focus on identifying the root causes of the incident, including both direct and indirect factors.

- Secure the area and evidences: Relevant witnesses, employees, and other parties involved will be interviewed. Evidence, such as photographs, machinery records, or environmental factors, will be collected to support the investigation.
- Create initial report.
- Track and analyse event trajectory.
- Recommend incident analysts to lead.
- Finalise incident documentation.
- Gather the team for incident closure.
- Close the investigation.
- Discuss and share lessons for improvement.

Responsibility for investigating accidents/ill-health/hazards/near misses is that of:

***Adrian McDowell, Head of Health, Safety and Environment*.**

Responsibility for acting on investigation findings to prevent a recurrence is that of:

***Adrian McDowell, Head of Health, Safety and Environment*.**

3.2 Accident and Incident Analysis

Accident and Incident Analysis is a structured approach to investigating, understanding, and preventing workplace accidents or incidents.

The goal is to identify root causes, take corrective actions, and prevent recurrence. Below are the key steps:

Identifying Causes:

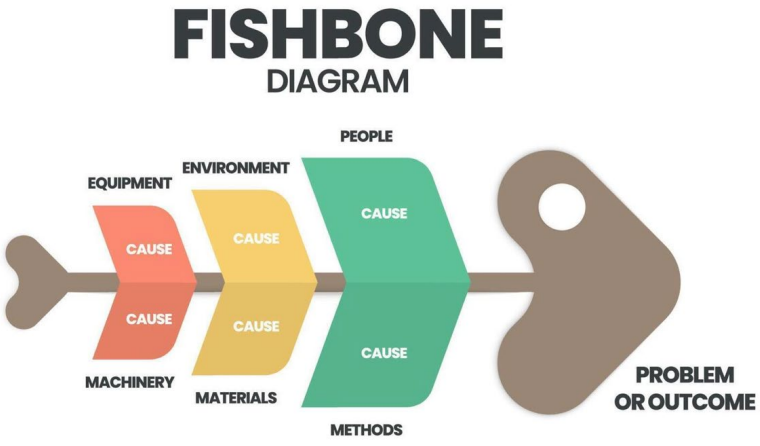
- **Immediate Cause**: The injured party being directly affected by the hazard (e.g. Injured person trips over broken floor tiles)
- **Basic Cause**: The reason for the incident (e.g., equipment failure, human error),
- **Root Cause**: Underlying factors contributing to the incident (e.g., lack of training, poor maintenance).

Contributing Factors:

- **Environmental factors**: the workplace and conditions affecting the employee, (e.g. workplace layout, structure, temperature, ventilation, humidity, lighting, noise),
- **Human / personal factors**: any characteristic or condition of a person that causes or influences that person to act unsafely, (e.g. knowledge and skill deficiencies, conflicting motivation, physical and mental incapacities,
- **Occupational factors**: effects of work on the employee (e.g. chemical, biological, work-related (ergonomic).

Analysis Methods:

- 5 Whys: Repeatedly ask "Why?" to drill down to the root cause.
- Fishbone Diagram (Ishikawa): Categorises possible causes (e.g., People, Process, Equipment, Environment).



A Fishbone Diagram, also known as an Ishikawa Diagram or Cause-and-Effect Diagram, is a visual tool used to identify, analyse, and display the root causes of a problem. It helps teams systematically explore potential causes of an issue to find the underlying factors.

- **Failure Mode and Effects Analysis (FMEA):** Evaluates failure points in processes.
- **Fault Tree Analysis**: Uses logic trees to trace causes of failure.

3.3 Internal Monitoring

In addition to the reactive monitoring of accidents/ill-health, NIS Group will also carry out proactive monitoring of Health and Safety performance.

To check our working conditions, and ensure our safe working practices are being followed, we will:

Carry out monthly inspections of all work areas. These are carried out by the site's designated safety champion.

Carry out quarterly inspections of all work areas. These are carried out by Adrian McDowell, Head of Health, Safety and Environment.

Examples of some of the proactive monitoring methods we use:

- Office safety visual inspections
- Weekly H&S check sheets
- Plant & equipment check sheets
- Fire safety tests, checks and inspections
- Reports of thorough examinations
- Legionella regime

3.4 Internal and External Auditing

3.4.1. Internal Health and Safety Audits

The primary goal of internal audits is to identify risks, assess compliance, and improve safety measures before external authorities inspect the workplace.

Objectives of Internal Audits:

- Ensure compliance with health and safety laws, policies, and standards
- Identify workplace hazards and risk areas
- Evaluate the effectiveness of safety programs and training
- Improve health and safety performance through corrective actions

Process of Internal Audits:

1. Planning: Define the scope, objectives, and criteria of the audit.
2. Review of Documentation: Examine health and safety policies, risk assessments, and incident reports.
3. Workplace Inspection: Conduct physical inspections to identify hazards.
4. Interviews: Gather insights from employees regarding safety practices.
5. Report Findings: Document observations, non-compliance issues, and recommendations.
6. Corrective Actions: Implement changes to address issues and improve safety measures.

Benefits of Internal Audits:

- Early detection of hazards and non-compliance
- Improves workplace safety culture
- Reduces the risk of legal penalties
- Enhances employee morale and productivity

NIS Group will conduct internal safety audits of all workplaces on a regular basis. The results of which will be discussed t the safety working group and communicated to the board.

The responsibility for conducting safety audits is that of:

Site Safety Champion.

The responsibility for reviewing, and analysing data from safety audits is that of:

Adrian McDowell, Head of Health, Safety and Environment

3.4.2. External Health and Safety Audits

Conducted by independent third-party auditors, regulatory bodies, or certifying agencies.

These audits provide an unbiased assessment of NIS Group's health and safety management system.

Objectives of External Audits:

- Verify compliance with health and safety laws and standards (e.g., HASWA, ISO 45001)
- Provide certification for legal or contractual requirements
- Benchmark health and safety performance against industry best practices
- Identify gaps and recommend improvements

Process of External Audits:

1. Audit Initiation: The external auditor defines the scope and criteria.
2. Document Review: Policies, procedures, training records, and incident logs are examined.
3. On-Site Inspection: The auditor evaluates the workplace for compliance.
4. Employee Interviews: Workers and management are questioned about safety practices.
5. Audit Report: A detailed report highlights strengths, weaknesses, and required corrective actions.
6. Follow-up Actions: Organisations must address non-compliance issues to maintain certification.

Benefits of External Audits:

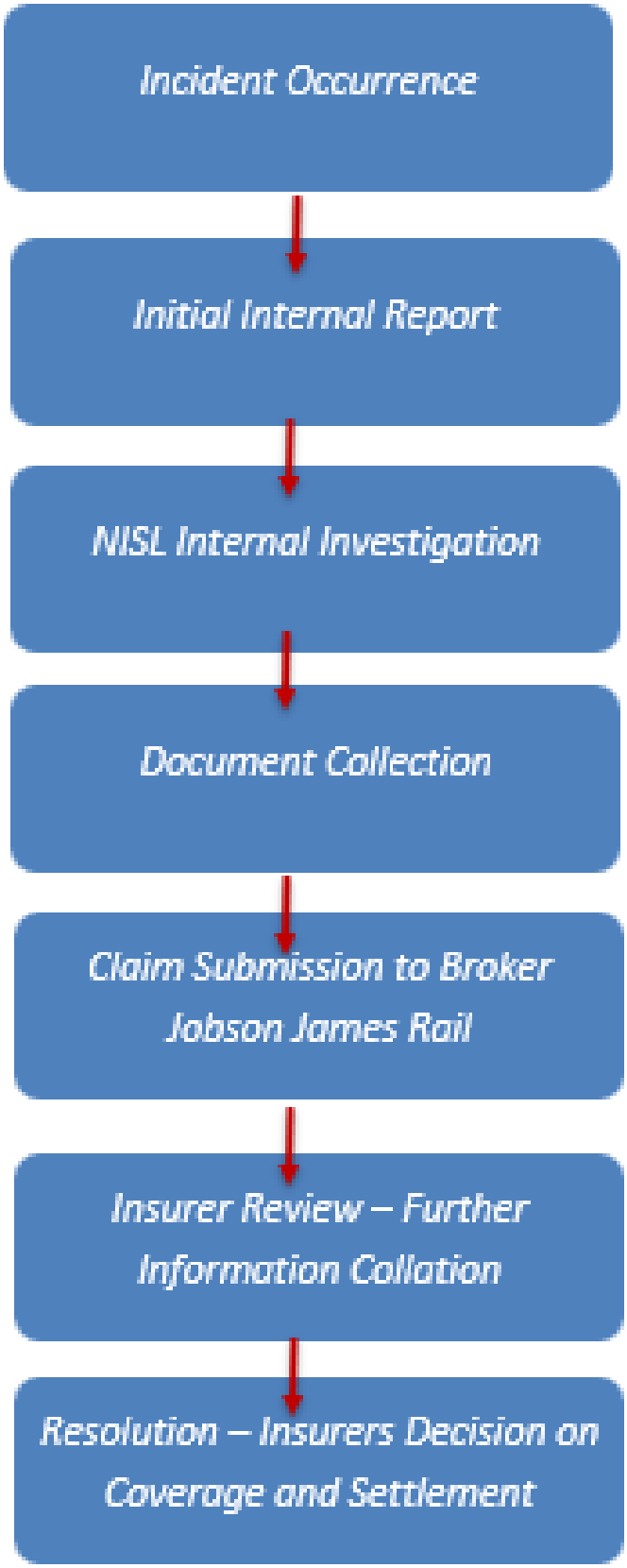
- Provides an unbiased, expert evaluation
- Enhances credibility and reputation
- Ensures compliance with legal requirements
- Supports continuous improvement in health and safety

The responsibility for reviewing, and analysing data from external safety audits is that of:

***Adrian McDowell, Head of Health, Safety and Environment*.**

3.5 Personal Injury Insurance Claims Management

Claims process flow chart:



4. ACT

4.1 Health and Safety Management System Review

NIS Group believes that Health and Safety is a vital component of the business. It is our belief, both morally and commercially, to have high standards of health and safety throughout the business - a good health record goes hand in hand with high productivity.

4.1.1. Introduction

This review assesses the effectiveness and compliance of the Health and Safety Management System (HSMS) within an organisation. The evaluation covers policies, procedures, risk assessments, training, incident reporting, and continuous improvement efforts.

4.1.2. Policy and Objectives

- NIS Group has a documented Health and Safety Policy that aligns with legal and regulatory requirements.
- The policy is reviewed periodically to ensure relevance and effectiveness.
- Health and safety objectives are clearly defined, measurable, and communicated to all employees.

4.1.3. Risk Assessment and Hazard Control

- Comprehensive risk assessments are conducted regularly.
- Hazard identification processes are in place and proactively managed.
- Control measures are implemented and reviewed for effectiveness.

4.1.4. Legal and Regulatory Compliance

- NIS Group adheres to national and local health and safety regulations.
- Compliance audits are performed to ensure adherence to relevant standards.
- Any identified legal gaps are addressed through corrective actions.

4.1.5. Training and Competency

- Employees receive regular health and safety training relevant to their roles.
- Training effectiveness is assessed, and refresher courses are conducted as needed.
- A record of training sessions and certifications is maintained.

4.1.6. Incident Reporting and Investigation

- A structured incident reporting system is in place.
- All incidents, near misses, and accidents are investigated to determine root causes.
- Corrective and preventive measures are implemented to mitigate future occurrences.

4.1.7. Emergency Preparedness and Response

- Emergency plans are established and communicated to all employees.
- Regular emergency drills are conducted to test the effectiveness of response procedures.
- Emergency response teams are trained and equipped for various scenarios.

4.1.8. Employee Engagement and Consultation

- Employees participate in health and safety discussions and decision-making.
- Feedback mechanisms are available for employees to report concerns.
- Safety committees or representatives are actively involved in HSMS improvements.

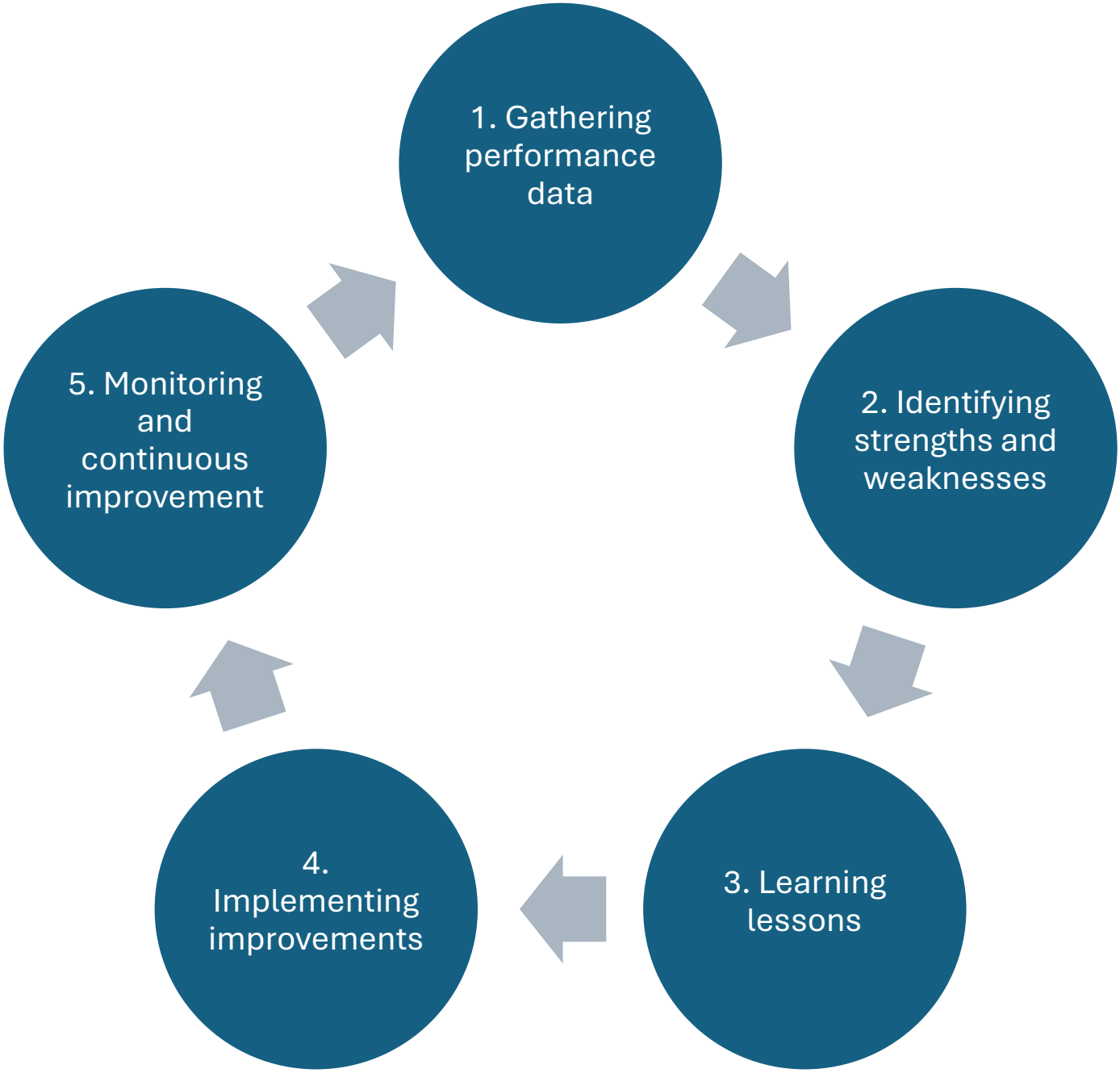
4.1.9. Performance Monitoring and Continuous Improvement

- Key Performance Indicators (KPIs) are established to monitor HSMS performance.
- Regular audits and reviews are conducted to identify areas for improvement.
- A culture of continuous improvement is promoted through management commitment and employee involvement.

4.2 Reviewing Performance and Learning Lessons

NIS Group will use a structured approach to reviewing the performance and effectiveness of its health, safety and environment programme. Where there are identified areas of development or weakness, appropriate action will be taken to ensure continuous improvements are made.

The following cycle of performance review will be followed:


1. Gathering performance data
2. Identifying strengths and weaknesses
3. Learning lessons
4. Implementing improvements
5. Monitoring and continuous improvement