


Document Title:	LUCY GROUP LTD HEALTH & SAFETY POLICY		
Document Number:	LGL-GEN-OHS-P-21		
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Lucy Group Ltd

GROUP


**HEALTH & SAFETY
POLICY**

FEBRUARY 2022

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REVISION HISTORY

Date Created	Issue	Reason for Change
12-01-2022	1	1 st issue under new document control system
25-02-2022	2	Review with minor changes

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1.0 SAFETY POLICY INTRODUCTION

The Directors of Lucy Group Ltd are charged with overall responsibility for the management of health and safety in all group workplaces. This Policy has been developed to oversee the Lucy group of companies as indicated on the organisation chart and collates their respective and individual Health and Safety Policies on a corporate basis. As named director, I represent the main board of directors in these matters and give an undertaking, on behalf of all of us, that we will comply with relevant statutory requirements and codes of practice in this respect, as far as reasonably practicable.

This corporate policy identifies a common management theme within the Lucy Group which is necessary to show how the parent company collates its health and safety responsibilities towards management, staff and all those who may be affected by individual company activities.

It gives a collective view of the group companies within their individual workplaces to show clearly the manner in which the directors discharge their duties suitably and sufficiently in consideration of workplace health and safety law whilst reflecting the Lucy Group culture and structure. The main board gives a commitment to safeguard and maintain the health, safety and welfare of its employees in their various workplaces as far as can be reasonably expected.


In some instances, the workplaces are shared in the sense that two of the companies work within the same building although they undertake different activities. Therefore, it follows in these circumstances that some procedures, such as emergency evacuations will be managed in an identical manner.

Nevertheless, separate and specific Health and Safety Policies have been developed to reflect the workplace activities of each company within its own right. These Policies reference the corporate Policy appropriately, to demonstrate compliance with general policies and procedures within the group. The main board will monitor individual companies together with the performance of responsible persons to maintain compliance.

Lucy Group Ltd is an equal opportunities employer and recognises the Equality Act 2010 which is designed to present a combined picture of non-discriminative procedures that employers must adopt in order to comply with legislation. These procedures relate to the physical nature of public buildings and facilities as well as relationships between individuals at their respective workplaces.

The company complies with the Act as far as reasonably practicable in consideration of providing access, egress and suitable circulation for everyone within Lucy Group workplaces. This is an ongoing process and policies and procedures will be regularly reviewed to take advantage of opportunities which may enable the company to make 'Reasonable Adjustments' to workplaces within its portfolio. This is an acceptable approach within the Equality Act.

Individual workplace commitments are detailed overleaf.


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2.0 GENERAL STATEMENT OF POLICY FOR HEALTH & SAFETY

The Directors of Lucy Group Ltd are charged with overall responsibility for the management of health and safety in all group workplaces.

The Company recognises its statutory duties under health and safety statute together with environmental legislation. This Statement details a commitment to comply with these responsibilities and to strive to continuously improve health and safety. The following duties will be undertaken and maintained:

- a. Safe workplaces, systems of work and workplace equipment will be promoted to ensure that the health, safety and welfare of staff are protected in company workplaces, as far as reasonably practicable.
- b. The maintenance of the workplace in a safe and risk-free condition, and the provision of safe means of access to and egress from the workplace.
- c. The provision and maintenance of a safe and healthy working environment with adequate welfare facilities and arrangements.
- d. The Company is committed to do all that is reasonably practicable to prevent workplace injuries and illnesses.
- e. Arrangements for ensuring the safe use, handling, storage, and transport of "articles and substances" which are inherently or potentially dangerous.
- f. All persons employed and engaged by the company will be competent to carry out their duties safely. Staff responsibilities and duties will be individually explained, however all employees will be expected to co-operate in fulfilling policy objectives and targets.
- g. Responsible persons have been appointed to operationally manage health and safety at all Lucy group workplaces.
- h. A Risk Management policy has been set up within the company and all health and safety statutes together with approved codes of practice will be observed. In particular, the Directors will ensure compliance with The Health and Safety at Work etc. Act 1974 and all relevant legislation which affects company activities.
- i. A systematic approach will be adopted which will identify hazards and risks in company workplaces. Competent persons have been appointed to conduct Risk Assessments. These Assessments will determine priorities for eliminating risks to the workforce, tenants, visitors, contractors and all others affected by company activities Where risks cannot be eliminated, appropriate controls will detail procedures that have been designed to review and minimise such risks, satisfactorily.
- j. Professional safety consultants have been retained to advise, help implement and monitor all aspects of health and safety within the workplace.
- k. The Directors will allocate the necessary resources to install and maintain this programme.
- l. Health and safety information, training and suitable supervision will be provided to ensure that operatives are aware of company procedures and directives.
- m. The Directors will set an example by installing high safety standards and the company will discipline individuals who fail to discharge their responsibilities, satisfactorily.

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- n. The Directors will review health and safety procedures in line with new and revised legislation/codes of practice, seeking advice from their appointed consultants, appropriately.

Duties placed on employers. Health and Safety at Work etc. Act 1974 Section 2. – (1)

'It shall be the duty of every employer to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all his employees'

Duties placed on employees. Health and Safety at Work etc. Act 1974 Section 7.

It shall be the duty of every employee while at work -

- (a) to take reasonable care for the health and safety of himself and of other persons who may be affected by his acts or omissions at work; and
- (b) as regards any duty or requirement imposed on his employer or any other person by or under any of the relevant statutory provisions, to cooperate with him so far as is necessary to enable that duty or requirement to be performed or complied with'

The Health and Safety Policy will be reviewed regularly and kept up to date, particularly if the company changes in structure, size, operations or location.

All staff will be made aware of the Policy - it will be available for their inspection. They will be expected to read and acknowledge in writing that they have understood the content with particular reference to their own responsibilities.

Signed:



Date:

28th March 2022

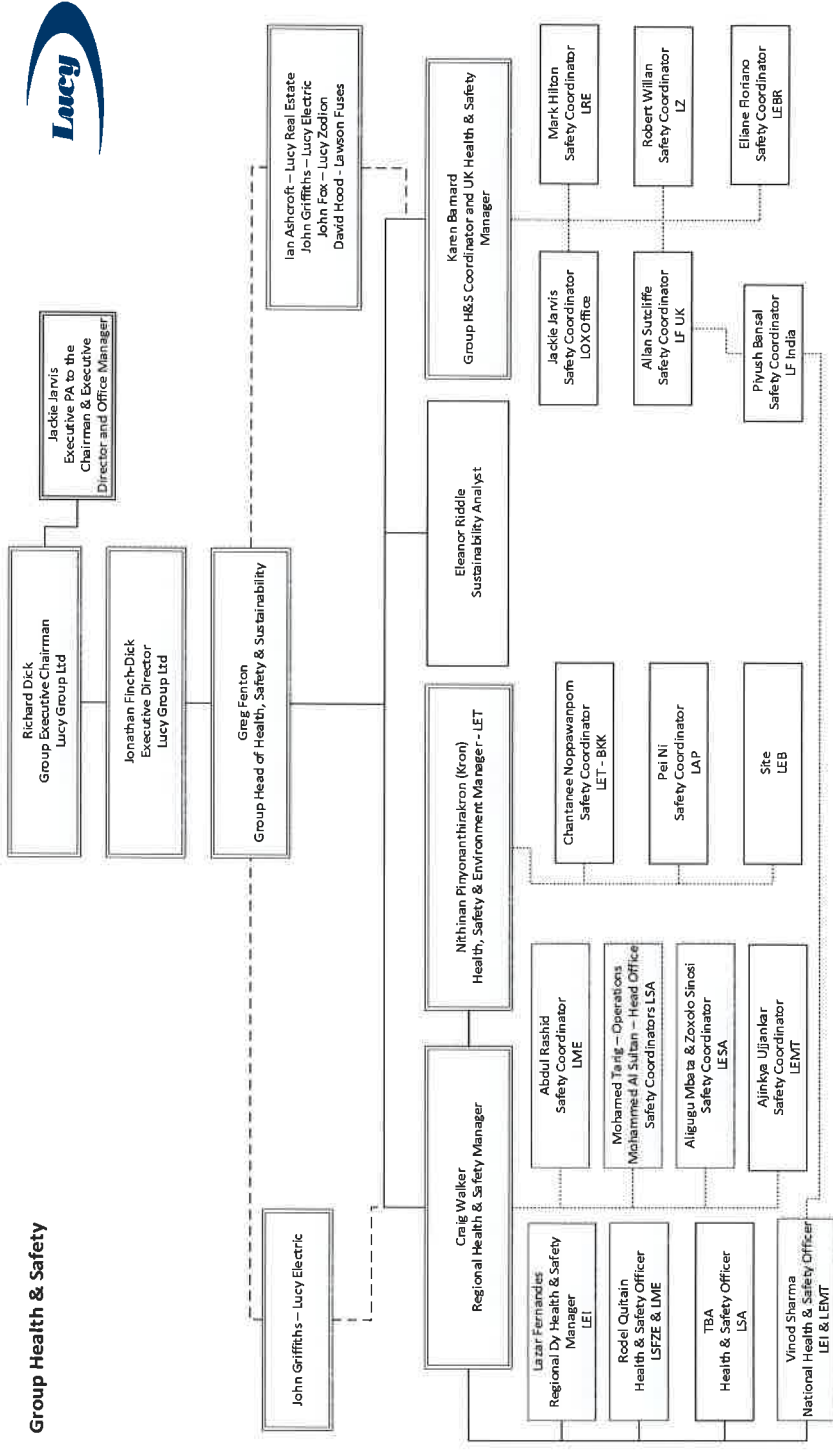
Richard Dick
Chairman
Lucy Group

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3.0 ORGANISATIONAL CHART


Group Health & Safety



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4.0 LUCY GROUP POLICY

The following headings identify the manner in which the main board of Lucy Group Ltd, manages health and safety on an overall basis.

Under these headings are the principal guidelines for workplace health and safety within the Lucy Group. Individual Lucy Group companies must follow these guidelines when developing their own procedures within respective workplaces. At appropriate times, audits will be carried out in the workplaces and the trail must show suitably compliant systems that have been developed from the corporate guidance.

Staff must follow procedures and systems of work that are laid down in their respective workplace Health and Safety Policy.

4.01 Management of Health and Safety

Each company within the group manages health and safety in its respective workplace. Health and Safety Policies have been developed for individual companies which reflect the safe management of activities within the specific workplace.

A named director has made a statement in each policy on behalf of the board of directors of each Company which details the particular company's commitment towards protecting the health, safety and welfare of staff, visitors and all those who may be affected by that company's activities. The Health and Safety Department will assist with these duties.

The directors of each company report to the main Lucy Group Ltd board of directors and are expected to provide reports at various intervals which outline their performance and compliance.

4.02 Specific Responsibilities

Job descriptions for directors and managers who have a group responsibility for health and safety are listed within this Policy (see section 5).

4.03 Staff Responsibilities

Reference is made to the second page of the Health and Safety Policy Statement [Page 5] where Section 7 of the Health and Safety at Work 1974 Act is quoted. Staff must remember that everyone in the workplace has responsibility for health and safety. The directors determine policy, the managers install and maintain this policy and the staff must respond by cooperating with the company to ensure compliance. Staff also have a duty to safeguard their own health and safety and that of others who may be affected by their action or non action. These are statutory requirements.

Whilst the Group Health and Safety Policy lays down overall procedures, management in each workplace install site specific systems for their particular location. Staff must understand these systems - they are obliged to read their workplace Policy as well as the Group Policy.

4.04 Risk Management

Responsible persons in each group company have a statutory responsibility to undertake and manage the Risk Management programme by developing and maintaining appropriate Risk Assessments and ensuring that any additional controls that have been identified are suitably installed.


It is the duty of the named director in each workplace to ensure the installation of their respective Risk Management programmes and monitor compliance and performance.

4.05 Emergency Procedures

Each workplace building has specific plans and procedures for emergency evacuation and major incidents/accidents. Such plans have been developed in conjunction with on-site management, the Health and Safety Department.

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Individual workplace areas have a Responsible Persons who will managing emergencies, arranging training, monitoring compliance and ensuring that regular fire drills take place and that any shortfalls are corrected. Fire Risk Assessments must be carried out in all workplace buildings and reviewed annually.

4.06 Staff Training

Workplace management must ensure that staff are suitably trained in health and safety and competent to discharge their responsibilities, safely.

New staff must receive Site Inductions and understand what action to take in emergency situations. This includes escape routes/exits and the Assembly Point location.

4.07 Accidents, First Aid and Reporting Procedures

All workplace accidents that cause injury must be treated by a First Aider and recorded in the Accident Book. Near misses should also be recorded.

It is the duty of workplace management to ensure that sufficient numbers of First Aid personnel are present, and that staff are aware of procedures (Site Inductions).

Where accidents and absenteeism as the result of an accident are reportable under RIDDOR, details must be forwarded to the UK Health and Safety Manager who takes responsibility for complying with these Regulations and reporting such events to the Health and Safety Executive (HSE). (See Duty Holders job description).

4.08 Communicative Diseases

The Group will follow all Government legislation and guidance concerning communicative diseases. Authorities sources of information will be referred to and to create specific procedure and risk assessments to ensure compliance.

5.0 HEALTH and SAFETY SPECIFIC RESPONSIBILITIES


5.01 Chairman

Primary responsibility for ensuring that the overall health and safety policies, frameworks and requirements are set out for the Group

- a. An overall duty to ensure the implementation and maintenance of the company Health and Safety Policy together with the Risk Control programme. Being aware of appropriate legislation with guidance where necessary from the company's health and safety department and external consultants.
- b. In conjunction with other responsible persons ensuring that adequate resources are available to meet the requirements of the Health and Safety Policy.
- c. Ensuring that health and safety issues are given due consideration when planning, implementing and managing company policy.
- d. Ensuring that proceedings for accident investigations and disciplinary reprimands are in place
- e. Communicating the safety message. Leading by example and setting high safety standards. Establishing appropriate health and safety committees.

5.02 Executive Director – with responsibility for Health and Safety

- a. Communicating the safety message. Leading by example and setting high safety standards. Establishing appropriate health and safety committees.


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- b. Working in close communication with the Group Head – Health, Safety and Sustainability, the health & safety team and the management of each business are maintaining and monitoring the highest levels of health & safety.
- c. Maintaining a responsibility to ensure a strong culture of health and safety within the management structure of the company.
- d. Managing and monitoring the overall health and safety performance of the Group through responsible, designated persons in respective workplace locations. Regularly reviewing performance and KPIs.
- e. In conjunction with the HR team, Monitoring the company’s responsibility to exercise a duty of care over consultation with staff when determining policy decisions that have health and safety implications for employees and others at the workplaces.

5.03 The Group Head – Health, Safety and Sustainability

Charged with:

- a. A working knowledge of the company Health and Safety Policy together with operational responsibility for managing health and safety in the workplaces.
- b. Monitoring compliance with the company Health and Safety Policy and the Risk Control programme, as far as reasonably practicable. Seeking professional advice from the company’s health and safety consultants, as necessary.
- c. Working in close liaison with the Chairman, Board of Directors, senior business management, General Managers and others to maintain health and safety compliance in all Group locations. Acting as a central supplier of health and safety information to staff and adopting a proactive stance in helping the group to maintain compliance with legislation.
- d. Safe keeping of group workplace health and safety documentation.
- e. Ensuring that suitable, appropriate and specific training is provided and maintained for all company personnel.
- f. Assisting managers and supervisory staff in developing and writing risk assessments and other health and safety documentation. Monitor progress.
- g. Liaising with Appointed Persons over correct procedures for ensuring that all known accidents are recorded in the company accident book. Monitoring procedures for reportable accidents to be recorded on form F2508[A] and submitted to the enforcing authority.
- h. Managing accident investigations where these are considered to be necessary.
- i. Monitoring and ensuring implementation of the necessary control measures for workplace hazards revealed from the Risk Assessment programme. Ensuring that Risk Assessments are duly carried out and that these procedures are monitored.
- j. Carrying out health and safety inspections and audits of the workplace as necessary to ensure compliance with company policy. Dealing with unsafe working practices as far as reasonably practicable. Reporting as necessary.
- k. Monitoring evacuation and emergency procedures at all workplaces
- l. Advising and informing management and staff of their responsibilities and safety issues to help them fulfill their duties suitably and sufficiently. Communicating with and assisting Safety Representatives.

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- m. Monitoring regular testing of mains powered portable appliances and fixed installations together with compliant servicing of workplace equipment.
- n. Attending and contributing to Health and Safety Committee meetings.
- o. Ensuring the presence of a competent deputy in the UK Health and Safety Managers absence, as far as reasonably practicable.
- p. Liaising with staff to ensure compliance with the company Health and Safety Policy and workplace policies and procedures.
- q. Supporting and encouraging health and safety promotions at all times.

REMEMBER

Alertness and awareness are cornerstones to good health and safety practice.

A low accident record depends on good communication and cooperation from everyone.

The safety process will be managed by discussion and consultation to make everyone feel part of the process.

In this manner health and safety issues should become part of normal working practice.