

Athena Policies

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1. Overview

- 1.1. Athena places a responsibility on its employees that all operational activities will be carried out at all times in accordance with the Athena Health & Safety Policy to safeguard, so far as is reasonably practicable, the health, safety, and welfare of all its employees and of other persons affected by its operations.
- 1.2. Athena Board has overall responsibility for health and safety within the company. This responsibility is delegated on a day-to-day basis to the Chief Executive who will ensure that health & safety responsibilities are properly discharged by all levels of management (as described below) and that this Policy is brought to the attention of all employees including new employees and contractors as the need arises. The Chief Executive is responsible to the Board for the proper execution of these duties and for ensuring that adequate resources are allocated to manage health & safety issues. The Chief Executive will arrange for an annual report on health & safety matters to be presented to the Board.

2. Managers and Team Leaders are responsible for the day-to-day implementation of safety arrangements within their areas / teams. Their main responsibilities are:

- a. To be accountable to the Performance and Oversight Committee, for the successful and consistent implementation of this Policy and compliance with its requirements by their staff, and by all contractors for whom they have management or supervisory responsibility.
- b. To ensure compliance and to be fully aware of this Policy and take all steps necessary to ensure that all persons for whom they have management or supervisory responsibility are made aware of it, its supporting systems, and their own responsibilities in turn.
- c. To understand the basic requirements of health and safety laws applying to the working practices of their section.
- d. To foster a positive attitude towards safety and make safety an item of business on the agenda of team meetings and/or briefings.
- e. To ensure suitable risk assessments are completed and reviewed as appropriate for all operational activities requiring assessment. Responsibility may be discharged by regular checks, inspections, and visits to enable them to identify potential health and safety hazards and activities. After identification of any hazards, they should ensure that suitable precautions are implemented, understood, and followed.
- f. To issue specific safety duties (safe systems of work; risk assessment and method statements as appropriate) to employees and contractors and ensure compliance.
- g. To ensure that all staff, particularly young persons (young persons are defined as being persons who have not attained 18 years), new starters, receive adequate training, instruction, information, and supervision in order for them to be able to fulfil their duties safely.
- h. To ensure that at each stage of planning work, consideration is given to suitable and adequate safety arrangements and welfare facilities to avoid injury, ill health, damage and /or loss.



- i. To develop, implement and maintain suitable and adequate local safe working procedures to protect against any risks identified.
- j. To maintain a good standard of housekeeping in the work area.
- k. To continually seek to develop and / or improve safe working practices to ensure a safe and healthy working environment and to identify, arrange for, and monitor the effectiveness of, training of employees.
- I. To ensure that all accidents are reported, recorded, and properly investigated in order to identify both immediate and underlying causes and to implement appropriate remedial action to prevent recurrence.
- m. To take appropriate action against staff and / or contractors who disregard their safety responsibilities or are negligent to such a degree that exposes either themselves or others to a significant risk of injury or ill health.
- n. To ensure that all relevant literature, advice, and recommendations, received from the Health and Safety Manager and/or any other source, are passed on to those persons, for whom they have management or supervisory responsibility.
- o. To ensure that all plant, equipment, articles, and substances, provided for the use at work are safe and without risks to health and safety and that all such items are used properly, maintained in a good state of repair and in efficient working order.
- p. To ensure that all personal protective equipment provided for use at work is suitable and correct for the intended use, that it is used properly and maintained in a good state of repair and in efficient working order.
- 3. All employees notwithstanding the aforementioned responsibilities, it is important to note that those persons who hold the above designations are also individual employees and so have the following general responsibilities, as does any other employee of Athena: These are:
 - a. To have a duty to take care of their own health and safety at work. They are also required to take reasonable care for the health and safety of others who may be affected by the way in which they work. All employees are obliged by law to cooperate with management as far as is necessary to enable the company to comply with health and safety law.
 - b. To be accountable to their immediate line manager or supervisor in supervision and / or training issues in the interests of health and safety at work.
 - c. To make themselves familiar with, and conform to, the requirements of this policy and its supporting systems.
 - d. To observe safety rules at all times and avoid improvising that might lead to unnecessary risks being taken.
 - e. To maintain and make full and proper use of all safety devices and or arrangements (including personal protective equipment) and to refrain from reckless interference and /or misuse of such items.
 - f. To use only the correct tools, plant and equipment for the work intended.
 - g. To co-operate with their immediate line manager or supervisor, any apparent defect or potential hazard in plant, equipment, articles, or substances that might give rise to a risk to health and safety.



- h. To report immediately to their line manager or supervisor, any apparent defect or potential hazard in plant, equipment, articles, or substances that might give rise to a risk to health and safety.
- i. To report immediately to their line manager or supervisor, any shortfalls and / or potential difficulties in meeting the requirements of safe working procedures and / or instructions.
- j. To properly report all accidents, incidents, (including loss and damage to plant, property, and equipment) and 'near miss's events, however minor in nature, to their line manager or supervisor as soon as possible.
- k. To co-operate with persons carrying out accidents, incidents investigations and to provide full and honest accounts when giving witness statements.
- I. To make appropriate suggestions to their line manager or supervisor on ways of improving health and safety arrangements.
- m. To refrain from engaging in or adopting unsafe working practices.
- n. To minimise risks to the health and safety of themselves and others, i.e., work colleagues, contractors, members of the public and visitors, who might be affected by their actions or lack of actions.
- o. To develop a personal concern for health and safety for themselves and for others, particularly inexperienced, new starters, and young persons.
- p. To attend health and safety training courses and /or briefing sessions as required.
- q. To take personal responsibility for health and safety.

4. Health and Safety Manager

- a. Athena has made provision for a "competent person" to assist them in providing health and safety advice and information on strategic and operational issues.
- b. The key activities of the Health & Safety Manager will involve both strategic and operational issues. These may include.
- c. Co-ordinating the professional health and safety function,
- d. ensuring the formulation, development and implementation of corporate plans and strategies, and the monitoring of departments health and safety performance.
- e. Promoting and encouraging excellent standards of health, safety, and welfare for all employees of Athena.
- f. Providing an advisory service to Directors, Managers and Officers to enable them to comply with there statutory responsibilities under relevant Health and Safety legislation.

5. HEALTH AND SAFETY ARRANGEMENTS

6. General Arrangements

- 6.1. The implementation of this Policy is largely a matter of establishing and implementing suitable and adequate safety arrangements, therefore:
- 6.2. Adequate management will be provided at all places of work by utilising the professional experience and competence of employees trained in health and safety matters.
- 7. All health and safety arrangements adopted by Athena are supported by safety management's guides, operational procedures, working instructions, codes of practice,



method statements and/or guidance material. Such information is communicated to employees in a number of ways. These include anyone, or combination of, the following:

- 7.1. Formal issue of written work instructions, safe operating procedures, and guidance notes.
- a. Training courses
- b. Team meetings
- c. One to One meeting
- d. On site supervision (toolbox talks)
- e. Newsletters, bulletins, circulars
- f. Posters, notices
- g. Handbooks
- h. Development reviews / appraisals
- i. Advice and guidance from Health and Safety Manager

8. Health & Safety Practice

- 8.1. Management will ensure that every workplace has procedures and practices implemented to address site specific issues and operational issues. Any such procedures and practices will be issued to employees by their manager and a copy held at their place of work where appropriate.
- 8.2. Management will ensure regular local safety inspections take place and that the findings of these are recorded.
- 8.3. Managers in control of a particular service or a particular site are responsible for the updating and maintaining of local procedures/practice.

9. Risk Assessment

- 9.1. In accordance with the Management of Health and Safety at Work Regulations, all work activities will be assessed for general risks to the health, safety, and welfare of employees.
- 9.2. Therefore, Management will ensure that sufficient risk assessments are completed as required for each workplace. These assessments will relate to the work activities of full and part time employees as well as those working on a temporary basis or as volunteers.
- 9.3. All risk assessments affecting the health, safety and welfare of employees should be completed on the Athena pro forma. Completed risk assessments must be dated and signed together with a review date by the line manager and employee group. Copies will be kept at the relevant site in case any employee wishes to refer to them.
- 9.4. Risk assessments will be reviewed in the light of significant change, an adverse incident, or on an annual basis. This will involve either a revised assessment or notation to indicate the date of an annual review and who completed it. On an annual basis Athena via Health and Safety Committee will conduct audits to check these risk assessments have been completed or reviewed on time.

10. Accident/Incident Reporting

10.1. Management will ensure that all accidents, reportable diseases, or incidents that occur in relation to work activities are reported correctly. In the first instance any accident/incident will be reported to the employee's line manager.



- 10.2. Any event resulting in injury, ill health, damage and /or loss, will be investigated by the manager in order to try and identify both immediate and underlying causes to the accident / incident. Following this careful consideration will be given to appropriate remedial action designed to prevent recurrence.
- 10.3. In the event of a serious accident/incident it will be necessary to telephone your immediate line manager in order that advice may be sought about investigation and any special reporting requirements. The manager can obtain advice from the Health & Safety Manager if guidance is considered necessary.

11. RIDDOR (Reporting of Injuries, Diseases & Dangerous Occurrences Regulations)

- 11.1. Management will ensure that injuries, disease, and dangerous occurrences that fall within RIDDOR regulations are reported and recorded as appropriate. Guidance and further details are available from a Health & Safety Manager Any notification required will be made to the enforcing authority by the Health and Safety Adviser. Reports to the Health and Safety Manager that fall under RIDDOR must be made at the earliest opportunity.
- 11.2. In order to comply with such notification procedures, managers must inform the Health and Safety Manager of all incidents that they believe are reportable. If a manager should have any doubts or queries these should be discussed with either the Health & Safety Manager or the Head of People and Organisational Development

12. Training

- 12.1. Athena recognises that training is an important element to achieving competence, not least in the area of health and safety. Suitable and adequate training contributes towards the overall safety culture of the organisation and is therefore needed at all levels, including Directors. The responsibility for identifying, monitoring, and documenting the effectiveness of training rests with the managers.
- 12.2. accident investigation should help determine the level of training needed for each type of work as part of the preventative and/or protective measures adopted. This might include basic skills training, specific on –the job training, training in general health and safety issues and emergency procedures, and by way or more specialist courses as may be considered to meet identified needs. Athena approach to the assessment of risks; workplace monitoring, and

13. In providing health and safety training Athena seeks to achieve the following objectives:

- 13.1. To encourage a culture of on-going development and raise awareness of the importance of good health and safety management.
- 13.2. To reduce potential problems (i.e., injuries, ill health, damage, or loss) which may arise due to unsafe working conditions and / or practices?
- 13.3. To meet the requirements of health and safety legislation.
- 13.4. Management will put in place local arrangements to ensure that all new employees will receive adequate induction training from their immediate line manager or nominated employee on their first day of work. The level of training will be dependent on the identified risks in the workplace and will be on-going as required.

14. Employee Welfare



- 14.1. It is the intention of Athena to adopt and maintain a proactive model of health care, with the emphasis on the prevention of ill health rather than individual problem solving. Athena objective is to ensure that risks to employees' health from work activities are properly controlled. To do this, and in accordance with the Health and Safety Executive's vision for an occupational health strategy for Great Britain, a number of aims have been identified.
- 14.2. To have suitable procedures and systems in place to address occupational health issues within Athena and to target them for action accordingly.
- 14.3. To have access to sound advice on occupational health that is appropriate to the needs identified.
- 14.4. To have systems for assessing the effectiveness of occupational health control measures
- 14.5. To secure commitment and participation from interested parties
- 14.6. To have systems/processes in place for assisting employees to return to (and remain in) work following injury or ill health events.
- 14.7. It is foreseeable that any employee who is directly, or indirectly, involved in an unpleasant work-related event may be left shocked, upset, stressed, or traumatised. In such situations, management will ensure professional support will be available from immediate colleagues and line managers.
- 14.8. Management has in place arrangements to help protect employees from the personal consequences of an unpleasant work incident. Initially, managers should contact the HR Business Partner Manager for advice.
- 14.9. Managers can also obtain advice on the occupational and individual stress risk assessment approach (c.f. Section 3.13) by contacting the Health & Safety Manager or the HR Business Partner Manager

15. Consultation with Employees

- 15.1. Athena acknowledges the importance of employee involvement in health and safety matters and the importance of the positive role played by safety representatives, Health and Safety Committee and the Health and Safety Manager. As such, it is the intention of the organisation to provide the facilities and assistance that such representative and committees might reasonably require in order to carry out their functions.
- 15.2. All employees will be consulted on health and safety issues by meetings and briefings conducted by line managers. There is a regular provision for elected Trade Union Health and Safety Representatives to meet and work with management representatives.
- 15.3. Health and Safety Representatives are required to give the organisation reasonable notice of their intention to carry out inspections, to provide written reports following such inspections and to follow the organisation's procedure when disputes over health and safety issues arise.
- 15.4. It is expected that any employee with a health and safety concern would take up the matter with their line manager through either the supervision process or arranging a special meeting. If the health and safety issue cannot be resolved, then an



employee has the right to raise health and safety concerns with the Health & Safety Manager or their Health & Safety Representatives.

16. Health & Safety Information

- 16.1. All workplaces under the control of Athena will display a copy of the Athena Health & Safety Statement of Intent (Appendix 1.).
- 16.2. A copy of the Athena' Health & Safety Policy must be available for inspection by all employees in every site/work base. At each site, a copy of the Health & Safety Executive's poster, "Health and Safety Law" (as revised July 2014), must be displayed. The appropriate sections on this poster must be completed and kept up to date by the site manager.

17. 3 SPECIFIED HEALTH AND SAFETY HAZARDS

- 17.1. The following sections outline the commitment of Management to address specified health and safety hazards commonly associated with the activities undertaken within Athena. The purpose of identifying certain generic hazards is three-fold: to raise manager awareness; to reduce risk of injury to employees and third parties; and to comply with specific health & safety regulations and approved codes of practice.
- 17.2. Where hazards are not subject to sector specific legislation, compliance will be based on the general duties of employers as expressed in the Health and Safety at Work etc Act 1974 and the Management of Health and Safety at Work Regulations. Account will also be taken of relevant guidance or information published by the Health & Safety Executive.

18. Physical Agents

18.1. Physical agents (noise and vibration) will be managed as in other areas of the Policy through hazard specific risk assessments. Where these hazards exist all managers are responsible, under the guidance of senior management, for establishing suitable management systems to ensure that adequate control is exercised. Employees will adhere to any reasonable requests and report any concerns.

19. Work Equipment

19.1. Athena expects that where a third party provides equipment a suitably qualified 'competent person' will have previously checked it. Employees must use any personal protective equipment or work equipment that is deemed necessary as a result of the risk assessment.

20. Fire & Emergency Procedures

- 20.1. The Management of Health and Safety at Work Regulations state that in the event of serious or imminent danger, emergency procedures will be established to protect employees and others. Building evacuation is the most common of these procedures. Emergency procedures may cover the spectrum of work activities ranging from personal safety issues to major incidents.
- 20.2. In accordance with the Fire Safety Order all workplaces will have fire risk assessments completed by the Manager. Managers should ensure that all premises under their control have written procedures for evacuating a building in the event of an emergency. These should include the management system.



- 20.3. for knowing who was (and was not) on the premises at the time of evacuation. This will usually be one of two methods: 'sweep and search' or a 'roll call' system. A copy of any Building Evacuation report should be forwarded to the responsible manager / director who should evaluate the significance of any particular evacuation. If necessary, additional advice should be sought from the Health and Safety Manager.
- 20.4. Employees may have received general fire awareness training, but they are not trained fire fighters and should not normally attempt to tackle fires at source. Instead, employees should follow emergency evacuation procedures.
- 20.5. Managers should consider those work activities that might cause serious or imminent danger to employees and clients and what procedures are in place to deal with the consequences. Foreseeable situations might include 'hot working' (e.g., contractors using burning equipment), bomb threats and possibly violent behaviour by a client.

21. First Aid

21.1. First aid for a particular site will be risk assessed in accordance with the requirements of First Aid Regulations. Managers should assess the need for first aid provision in relation to the workplace and the activities carried out there. The assessment should consider the number of trained persons required (if any), considering likely absences, and the level of training necessary for such persons. Employees must be made aware of which person(s) are trained in first aid. First aid equipment must be maintained and stocked as per the regulations.

22. Infection Control

- 22.1. Athena will establish and review procedures to identify infections that may arise from the work activities. In certain cases, this may require medical screening or medical surveillance of employees. Employees will be made aware of the universal precaution to prevent transmission of infection to others by following good hygiene practice.
- 22.2. Managers of employees who have concerns about the risk of employee exposure to infection must carry out a risk assessment to demonstrate that.
- 22.3. Full consideration has been given to such concerns. Appropriate advice may need to be taken from a professional source. Where an employee appears to be suffering ill effects from work-related activities, managers have the option to refer employees to Athena' Occupational Health Provider for assessment and advice. Managers will report as required by RIDDOR where a specified work-related medical condition as detailed by those regulations. Guidance and further details are available from a Health & Safety Manager

23. Hazardous Substances (COSHH)

- 23.1. Chemicals used in the workplace are subject to the Control of Substances Hazardous to Health Regulations (COSHH). Where substances are used that
- 23.2. might affect the health of employees or clients these will be dispensed with or substituted for safer alternatives. Where this is not possible any identified hazardous substances will be assessed so that adequate controls are put in place.
- 23.3. These controls may include the issue of equipment (e.g., protective gloves, hard hat etc.) in line with the criteria laid out in the Personal Protective Equipment at Work



Regulations. Managers will ensure that employees will be instructed on any hazardous substances where the assessment indicates a significant risk of exposure or exposure beyond acceptable time limits.

24. Display Screen Equipment (Visual Display Units/Computers)

- 24.1. Under the Health and Safety (Display Screen Equipment) Regulations, managers have a duty to ensure that each workstation is assessed. The task may be delegated to an office or section manager and should be completed using the corporate pro forma. Copies of assessments should be retained within individual sections/workgroups.
- 24.2. The workstation assessment will include the actual display screen equipment and the associated furniture to ensure that they meet the required standard. This assessment will include such matters as screen glare and reflection. Seating will be adjustable to avoid poor posture and associated health problems. Athena offers a cash health plan to employees which include a contribution to optical costs. Alternative arrangements are provided for employees who have opted out of this scheme.

25. Electricity

- 25.1. Electricity, even low voltage, has the potential to kill. Employees and clients who are present on premises controlled by Athena will be protected from electrical risk by electrical installations and all portable electrical equipment being tested at appropriate intervals. The frequency of testing will be dependent upon the assessed risk. A list of electrical equipment present in the workplace should be kept and must take account of new additions.
- 25.2. Tasks such as changing a light bulb or replacing a blown fuse may seem innocuous situations but could potentially carry the risk of electric shock. (If a chair or ladder is used then falling from a height may also be a risk!) A qualified electrician should always repair any electrical faults.

26. New or Expectant Mothers

- 26.1. When an employee notifies the company that she is an expectant mother a risk assessment of her work activities will be undertaken to comply with the
- 26.2. Management Regulations and the New / Expectant Mothers Directive. This will need to be reviewed during the term of the pregnancy. The line manager will complete a further assessment upon her return to work or in the event of the pregnancy being interrupted.
- 26.3. The purpose of this special risk assessment is to protect the safety and well being of mother and child which otherwise might be harmed by the work activities usually undertaken. The employee's immediate line manager is responsible for the risk assessment being carried out and reviewed, as necessary. The task can be delegated to other managers, with their agreement, who are better placed to undertake the assessment.

27. Manual Handling

27.1. Manual handling risks may arise from the normal work activities of employees. These activities will include general issues and specialist activities associated with meeting the operational needs of Athena.



- 27.2. As required by the Manual Handling Operations Regulations routine manual handling hazards will be assessed through general risk assessment. A pro forma exists to help managers complete the required detailed manual handling risk assessment where it is determined there is significant risk of serious injury. This assessment will identify the means by which the risk can be eliminated or reduced to an acceptable level.
- 27.3. Employees must make use of any lifting equipment provided as a result of the manual handling assessment. Unless trained to do so, employees should not use equipment specifically intended for the lifting of people.

28. Lone Working

- 28.1. Certain occupations within Athena will involve employees working alone. This may particularly be the case for those who work separately from others including mobile workers, for work undertaken outside traditional normal hours, or those working with only few colleagues in small establishments.
- 28.2. In such cases, risk assessment will be undertaken in order to assist in establishing what assistance a lone worker requires. Management should also ensure that adequate procedures are put in place to monitor lone workers.
- 28.3. These may include periodic checking, specific and regular contact periods [by telephone, radio, GPS etc], other alarm devices and/or checks to ensure a lone worker has returned to base/home.

29. Personal Safety

- 29.1. Some of the work undertaken by Athena can cause concerns for the health, safety, and welfare of employees. The risk to employees providing a particular service will be assessed and suitable precautionary measures put in place, so far as is reasonably practicable. Employees will be consulted and informed of the result of such assessments by their line managers.
- 29.2. In reception areas and interview rooms security aids, such as panic alarms (pendant or fixed), will be subjected to a regular testing regime. Managers will ensure through risk assessment that employees have confidence in such emergency aids. In the event a panic alarm is activated employees will be familiar with the expected and appropriate response on their part.

30. Violence to Employees

- 30.1. Athena regards verbal, emotional or physical abuse to employees as being unacceptable. Where foreseeable, Athena will do all in its power to anticipate and moderate any aggressive behaviour displayed by clients or other persons.
- 30.2. When an unforeseen event occurs, strategies will be devised to minimise the risk of a recurrence. The rights of the employee and the clients will be assessed equally. This statement applies equally to instances of abuse directed at culture, ethnicity, disability, and gender. Reports of violence to employees must be recorded on Athena Accident/Incident Report Form.

31. Stress



- 31.1. Stress is recognised by the Athena as being a potential source of ill health. When stress is clearly related to the occupation/workplace, Athena will take all reasonable steps to minimise its adverse effects.
- 31.2. In line with Health & Safety Executive advice on best management practice occupational stress risk assessments will be completed with the intention of working with employees to eliminate or control stressors. An Athena Policy is available for further information and advice in this area.

32. Transport

32.1. Vehicle movement has the potential to pose a safety risk to both employees and clients. Employees who use their own vehicles in the course of their daily work activities will have their licence, vehicle insurance (business use) and MOT certificate checked and recorded as verified by the HR Dept.

Workplace Health, Safety and Welfare

32.2. The Workplace (Health, Safety and Welfare) Regulations detail various aspects of the workplace that employers have a duty to maintain. These include, amongst others, such matters as lighting, ventilation, toilets, drinking water and workspace. Athena is committed, so far as is reasonably practicable, to providing its employees with a healthy and safe working environment by taking full account of these regulations and associated guidance.