

bluesource Information Limited is hereinafter referred to as "the Company".



Images from: <https://worknest.com/blog/ten-top-health-safety-tips/>

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## 1. Overview

This policy outlines the commitment of Bluesource Information Limited to meeting our legal duties and providing, as far as is reasonably practicable, the required standard or above for the Health and Safety of the company and the people affected by our business activities. We will take steps to ensure our statutory duties are always met.

It outlines details of:

- Our organisation;
- The Health and Safety structure of our organisation;
- Responsibilities within the company for implementing our management system;
- Responsibilities of Personnel outside the company;
- Safety arrangements and procedures;
- Arrangements for auditing, monitoring and reviewing the Health and Safety systems.

We have examined the way in which we carry out our business activities in line with the responsibilities placed on the company by the Health and Safety at Work Act 1974 (HASWA), established industry standards, nationally issued guidance, and codes of practice.

This policy is regularly monitored to ensure that the objectives are achieved and will be reviewed on an annual basis or more frequently if required and, if necessary, revised in the light of legislative or organisational changes.

The Health and Safety Policy Statement will also be reviewed on the annual basis and distributed to staff in electronic form. Also, our Health and Safety Law poster is displayed in the Kitchen area of the office, accessible for everyone at the premises.

Bluesource Information Limited will exceed their standards for Health, Safety and Welfare within the work environment by engaging our employees through delegating responsibilities to managers, supervisors and any other personnel that have been given suitable and sufficient information, instructions, training, and supervision.

## 2. Scope

Every new employee when they join the Company and as a regular refresher, are given relevant information, instruction, and training as is necessary to enable the safe performance of work activities, such as fire safety, health and safety in the workplace and where applicable, first aid. Specialist advice and services will also be sought if required, and we will consult with our employees as deemed necessary.

All employees working for The Company understand their responsibilities for Health and Safety. Everyone has a legal obligation to take reasonable care for their own health and safety and for the safety of others who may be affected by their acts or omissions.

The successful implementation of this policy requires total commitment and co-operation from all levels of management and employees within Bluesource, as we support a 'don't walk by' culture and encourage everyone to be an ambassador of safety for the company. We will continue to monitor and review our business activities to ensure we maintain and improve the Health and Safety of the Company.

As the company has adopted hybrid working, please also refer to the working from home and appropriate health and safety section, section 19 of this handbook.

For more in depth or specific information, please contact Nick Jagers who is the overall Responsible Person in charge of Health and Safety.

### 3. Health and Safety Policy Statement

Bluesource Information Limited are committed to, and accept our moral and legal duties for ensuring, so far as is reasonably practicable, the Health and Safety, Welfare and Wellbeing for all our employees within the work environment and that of others who may be affected by its activities. This policy will be implemented in all premises owned or controlled by the Company.

In pursuance of this policy, the Company will act to:

- provide adequate control of the health and safety risks arising from our work activities
- consult with our employees on matters affecting their health and safety
- provide and maintain safe plant and equipment
- ensure safe handling and use of substances
- provide information, instruction, and supervision for employees
- ensure all employees are competent to do their tasks and to give them adequate training
- ensure sufficient resources are provided to meet the needs of the Health and Safety Policy;
- prevent accidents and cases of work-related ill health; maintain safe and healthy working conditions
- review and revise this policy as necessary at regular intervals.

To assist us in complying with our legal duties, all employees are required to cooperate with The Company, to ensure that they promote a positive safety culture and that their acts or omissions do not cause harm to themselves or others. Any dangerous activity will be subject to disciplinary action for breach of the company rules.

Bluesource Information Limited also recognise our duty of care to ensure that the Health and Safety of visitors, contractors and the general public is not affected as a result of coming into contact with our premises and activities. These persons will be given the relevant information and instruction prior to visiting the premises and ensure that their activities are controlled and monitored in such a way as to identify health and safety failings early, so as not to cause harm to our employees or themselves.

All sections within this policy have been approved by Nick Jagers (as per section 9), and are reviewed annually, or earlier if there is a significant change within the business.

## 4. Health and Safety Policy Responsibilities

### 4.1 Senior Management Responsibilities

Has overall responsibility under the Health and Safety at Work Act 1974 for health and safety matters within the Company and in particular will:

- ➊ Ensure that the Health and Safety Policy statement, Company Policies and individual responsibilities and duties are understood and implemented by all managers under their control
- ➋ Take an active role around health and safety matters by promoting a positive work culture and acting promptly where deficiencies are identified;
- ➌ Ensure that resources are widely available for the successful implementation of the Health and Safety Policy;
- ➍ Delegate responsibilities to appointed, competent persons who will manage the Health, Safety and welfare arrangements within the company;
- ➎ Be responsible for ensuring that adequate training is given to staff to ensure compliance with the Company health and safety standards
- ➏ Be responsible for resolving health and safety problems / queries referred to them
- ➐ Ensure that the activities of everyone are well coordinated
- ➑ Ensure effective means of involvement, communication, and consultation with staff
- ➒ Undertake risk assessments as required for health and safety
- ➓ Review risk assessments periodically or when work activity changes
- ➔ Responsible for identifying all equipment/plant needing maintenance and ensuring effective maintenance procedures are in place and implemented
- ➕ Identifying any substances which need a COSHH assessment and special handling
- ➖ Take an active role within the investigation procedure for serious accidents, incidents and cases of ill health.
- ➗ Ensuring that employees working at locations under the control of other employers are given relevant health and safety information.

Additionally, the Managing Director (MD), and the Head of Operations are responsible for Fire Safety and the Company's annual Fire Risk Assessment.

## 4.2 Responsibilities of All Members of Staff

Whilst at work, all staff must, in accordance with Health and Safety at Work Act 1974:

- Read and understand Bluesource Information Limited Health and Safety Policy and comply with the arrangements identified in this document
- Understand the importance of a positive Health and Safety culture by leading by example and enforcing health and safety rules;
- Use any equipment provided to them by the Company in accordance with any training and instructions they have received in the use of the equipment
- Co-operate with senior management to enable them to comply with their statutory duties for Health and Safety
- Take reasonable care for their own Health and Safety and that of others who may be affected by their actions or omissions at work
- Undertake Health and Safety training required by the Company
- Report all health and safety concerns to Senior Management.
- Not to intentionally or recklessly interfere with, or misuse any item provided in the interest of Health, Safety and Welfare.
- When carrying out work on our client's premises, employees will follow the site safety rules and be familiar with the emergency procedures;
- Report any colleagues who are not complying with the safety arrangements to their manager. This includes safety concerns, accidents or near misses;
- Not to work under the influence of alcohol or drugs.

## 5. Arrangements

### 5.1 Risk Assessments

The Management of Health and Safety at Work Regulations 1999 require us to carry out a suitable and sufficient risk assessment to determine the risks to the Health and Safety of staff and persons not in our employment associated with our undertaking.

The Company will take all reasonable steps to ensure that risk assessments are carried out which detail the range of hazards and risks associated with our work activities and the condition of our premises, together with any necessary remedial actions.

With hybrid working, the Company still has responsibility for its worker's health and safety and therefore requires a risk assessment of an employee's work environment to be undertaken, usually in the form of a self-assessment, and is a condition of being permitted to work remotely.

### 5.1.1 Control Measures

Where work activities, items or areas with significant risks are identified, the risk assessment will contain details of the measures that must be applied or actions that must be taken in order to eliminate, reduce or control the risks in question and therefore allow the activity etc. to be carried out safely.

These required measures or actions are referred to as `control measures`. The following principles will be applied to adopting control measures:

- Avoiding the risks altogether;
- Evaluating the risks which cannot be avoided;
- Combating risks at source;
- Adapting the work to the individual;
- Adapting to technical progress;
- Replacing the dangerous with the non-dangerous or less dangerous;
- Developing a coherent overall prevention policy;
- Giving collective protective measures priority over individual protective measures;
- Giving appropriate instructions to employees.

### 5.1.2 Review and Revision

The risk assessments must be kept up-to-date and be reviewed and modified, where necessary. If changes take place which mean that the current risk assessment is no longer valid or that it can be improved, the assessment must be reviewed. In all cases, risk assessments will be reviewed on a regular annual basis.

All significant findings of risk assessments and subsequent monitoring must be recorded within annually reviewed London Office Risk Assessment Document. The records must include:

- The significant hazards identified in the assessment - those which might pose serious risk to workers or others who might be affected by the work activity if they were not properly controlled;
- The levels of risk associated with the hazards;
- The existing or required control measures;
- The people who may be affected by the risks or hazards, including any groups of employees who are at special risk;
- Decisions taken as a result of the assessment.



The person responsible for Risk Assessment and Management is Head of Operations and delegated staff.

## 5.2 Safe Systems of Work and Working Procedures

The Company recognises that we have a responsibility to provide a safe and healthy working environment and acknowledge that this includes ensuring that safe systems of work and/or safe working procedures are developed, understood and followed.

In particular, the considerations that will be applied in relation to the preparation and development of safe systems of work and safe working procedures will include:

- The work or tasks being carried out;
- The associated potential hazards;
- Any existing instructions or procedures;
- Who is doing the work;
- The skills and abilities of the people;
- The level of control and supervision required;
- The tools or equipment that are required;
- The associated training requirements;
- Any isolation or locking-off requirements;
- Any permit to work requirements;
- Other activities being carried out;
- Communication requirements;
- Emergency planning;
- Handover procedures upon completion;
- Monitoring requirements;
- Review and updating requirements.

The following rules and procedures will be followed in relation to this area:

- All safe systems of work and safe working procedures will be developed by the relevant manager / supervisor in conjunction with Head of Operations;
- All safe systems of work and safe working procedures will be brought to the attention of all employees and other persons that they affect;
- Regular monitoring of compliance with, and the effectiveness of, all safe systems of work and safe working procedures will be carried out;
- All safe systems of work and safe working procedures will be reviewed and amended, where necessary, on an annual basis or when significant changes in the activities or other matters to which they relate occur;

- All safe systems of work and safe working procedures will be reviewed and amended, where necessary, following an accident or incident arising from the related activities, or when the results of monitoring reveals problems of compliance or effectiveness.

### 5.3 Information, Instruction and Training

The need for effective communication between all parties in the workplace is recognised by the Company. To enable the business to carry out its work activities, it will ensure that its employees, workers and visitors are provided with adequate information and suitable instructions. Such information and instruction will be provided in a form which takes account of any language difficulties or disabilities.

In addition:

- Information relevant to the safety of all will be communicated where the workplace is shared.
- The Company will not require any employee to perform any work activity or task unless he/she has received suitable and adequate information, instruction and training, or is working under the supervision of a trained and competent employee;
- The Company acknowledges the importance of providing information, instruction and training to all new staff as soon as is practicable after commencement of employment;
- The Company recognises that instruction and training may also be necessary for existing employees to act as a reminder and to accommodate any changes in their work practices or Environment;
- The Company accepts the responsibility of ensuring that all temporary employees are also given basic health and safety information, instruction and training appropriate to their work activities and environment;
- The training needs for all employees (or groups of employees) and their related work activities will be evaluated, and the results of the evaluation will form the basis of a training matrix;
- Records will be kept of all training provided to employees and any relevant outcomes.

In the London head office, as the main location of work for all employees, all relevant safety information will be provided. This will include:

- HSE law poster
- Fire safety instructions
- Names of Fire Wardens and First Aiders
- Employer's Liability Insurance Certificate
- Health and Safety Policy
- Environmental Policy

- Other safety instructions relevant to that workplace

The person responsible for overseeing information, instruction and training is the Office Manager, under the supervision of the Head of Operations.

## 5.4 Procedure for Dealing with Health and Safety Issues

Where staff raise a matter related to health and safety the Company will:

- Take all necessary steps to investigate the circumstances
- Take corrective measures where appropriate
- Inform the member of staff the results of the investigation and the action taken.

### 5.4.1 Accident Reporting and Reporting Procedure

Bluesource Information Limited recognises that it has a responsibility to provide a safe and healthy working environment and acknowledge that this includes ensuring that all accidents and incidents are reported and investigated.

All injuries, incidents, or dangerous occurrences, however minor, must be reported to a responsible person (Senior Manager of the Company) and the Operations team.

The Company must be informed of all incidents and dangerous occurrences to enable us to take remedial action.

For these purposes, an accident is defined as any unplanned event which may give rise to injury, ill health, property or plant damage or any other potential loss, including near misses.

Staff must record the incident as soon as possible after the event. If an injury renders staff unable to make an entry in the accident book, this should be completed by a witness or someone who is able to enter an account of the incident. The accident book is held in the first aid box within the office and any completed sheets must be sent to Operations and not left viable in the book. Completed sheets need to be passed by Operations team to HR, to be filed in an individual's HR record.

This policy outlines the procedures which are to be adopted when any staff, visitor or contractor experiences an accident or dangerous occurrence. It covers reporting and recording procedures for managers, staff, and non-staff.

Incidents that happen whilst working out of the office, whether at home under hybrid working or customer site, should be reported.

An injury may be dealt with by the appointed First Aider. However, if an emergency arises, medical assistance e.g., an ambulance must be called for at the first opportunity, the procedure being:

- Call 999
- Give the exact location of the accident - be as precise and clear as you can
- Arrange for someone to meet the ambulance and direct it to the accident
- Contact a Senior Manager immediately.
- Inform the Operations Team.

The person responsible for overseeing our Accident Reporting and Investigation arrangements is the Head of Operations.

## 5.5 First Aid Arrangements

The Health and Safety (First-Aid) Regulations 1981 require employers to provide adequate and appropriate equipment, facilities, and personnel to enable first aid to be given to staff if they are injured or become ill at work. Considering the number of staff and the location, we have appointed First Aiders to take charge of First Aid and to take charge of the situation relating to an injured or ill staff member who will need help from a medical practitioner or nurse. Details of the First Aiders can be found on the “What you need to know” Health and Safety poster displayed in the Office.

Please be advised that as the Company has now introduced hybrid working, the office is deemed a low-risk environment and typically less than 10 people are expected to be in at one time under normal circumstances. As such it has been deemed unnecessary to ensure that a first aider is always present and as a precaution, the Company has encouraged all employees to complete a first aid refresher course to assist them either at home or in the office, in case of need. Bluesource recognises all employees who completed the First Aid Online training as ‘Appointed Persons’. If you have not received or been offered this training and would like it, please contact the Operations Team.

### *Duties of First Aiders:*

- To ensure the first aid facilities are available and boxes are stocked according to the issued instructions;
- To maintain records in all of the cases that they treat;
- To inform Operations Team of any matter relating to the provision of first aid that they deem necessary;
- To carry out the duties of an Appointed Person as appropriate;
- To maintain a current first aid certificate;
- Operations Manager is responsible for maintaining the First Aid box and replenishing as necessary

### *Duties of Appointed Persons:*

- To take charge of situations where someone is injured or falls ill;
- To ensure a first aider is summoned (if available);
- To call an ambulance and/or other emergency service;
- To give any emergency first aid treatment to the level for which they have been trained.

## **5.6 Fire Safety Arrangements**

It is company policy to protect the welfare of its employees, visitors, and contractors against the incidence of fire by complying with Fire Safety Legislation. This is covered by standalone Fire Safety Policy, available at: Fire Safety Policy.

Since moving to hybrid working and adapting the office accordingly, the Company requires all staff to potentially step into the role of a fire marshal in the event of a fire, with the most senior person in the office at the time of the alarm and the meeting organiser taking responsibility and reporting back to Operations.

The role of Principal Fire Marshals in the company lies with Nick Jagers and Monika Cyrkiel, whose responsibilities are:

Examine escape routes and exits paying particular attention to:

- Clear 'pathways' and corridors.
- Condition of floor surfaces.
- Self-closers on doors.
- Signage.
- Lighting.
- Handrails and balustrades.
- Stair nosing and steps.
- Check intumescent strips are okay and hinges fire graded
- Panic bolts.
- External routes.

Check extinguishers for:

- Availability and location.
- Suitability.
- Condition.
- Servicing and maintenance.
- Reserves.

Management systems:

- Look at training records including fire drills.
- Ensure regular fire alarm tests are taking place.
- Challenge unwanted fire alarm signals.

Examine your area regularly for:

- Storage arrangements.
- Standards of housekeeping.
- Control of ignition sources.
- Basic electrical safety.
- Security / arson.

Check for:

- New people (or new needs).
- New processes.
- New equipment or materials.
- Building works and control of contractors.

Article 23 of the Regulatory Reform (Fire Safety) Order 2005 places a responsibility on every employee. These responsibilities are:

- To take reasonable care for the safety of themselves and others who may be affected by their acts or omissions at work.
- To co-operate with their employer in complying with Fire Safety Legislative requirements.
- Inform the employer of any situation that would represent a serious and immediate danger to the safety of persons from fire, and any shortcoming in the employer's protection arrangements for safety.

In addition, employees who have undergone Fire marshal training, must be prepared to step into the role of fire marshal, when the situation arises.

All employees must co-operate with the Fire Safety Manager and Fire Marshals in the event of an emergency, and report to their line managers immediately upon evacuation from the building.

The reactive responsibilities are as follows:

- If you discover a fire:
  - Raise the alarm in the room of origin.
  - Evacuate this room and close the door.
  - Raise the general alarm.
  - Begin evacuating people in line with the emergency plan.
  
- When you hear the alarm:
  - Motivate people to begin evacuating.
  - Search your area.
  - Make sure that visitors and colleagues with individual needs are given assistance.
  - Direct people to the nearest available exit.
  - Ensure that doors are closed enroute.
  - Leave the building and proceed to assembly point.
  - Report on your area to person overseeing the evacuation.
  - Report the incident to Operations Team
  
- If people refuse to move:
  - Leave the building and report this to the fire service and management.
  
- Post incident:
  - Only re-enter building on fire service direction.
  - Challenge false alarms at source on every occasion.
  - Provide feedback on evacuation and other fire safety issues to line manager.
  - Seek comments from your colleagues and recognise their assistance or contribution.
  - Reflect on what you have learned.

**Remember, firefighting is the least important issue and must never involve putting yourself or others at unnecessary risk.**

## 5.7 Identified Risks (form Office Risk Assessment)

This section of the Policy will cover arrangements in regards to risks identified by the by the Company's Office Risk Assessment ([London Office Risk Assessment Document](#)).

### 5.7.1 Display Screen Equipment (DSE)

If you use DSE regularly as a significant part of your normal day (daily for continuous periods of an hour or more), the following guidelines should be followed to reduce any risks associated with Display Screen Equipment (i.e., computers, monitors, and laptops).

Some workers may experience fatigue, eye strain, upper limb problems and backache from overuse or improper use of DSE. These problems can also be experienced from poorly designed workstations or work environments. The causes may not always be obvious and can be due to a combination of factors.

In addition to the Workstation setup recommended above, the following additional recommendations from the Health & Safety Executive, may help:

### ***Getting comfortable***

- Forearms should be approximately horizontal, and the user's eyes should be the same height as the top of the screen.
- 
- Make sure there is enough workspace to accommodate all documents or other equipment. A document holder may help avoid awkward neck and eye movements.
- Arrange the desk and screen to avoid glare, or bright reflections. This is often easiest if the screen is not directly facing windows or bright lights.
- Adjust curtains or blinds to prevent intrusive light.
- Make sure there is space under the desk to move legs.
- Avoid excess pressure from the edge of seats on the backs of legs and knees. A footrest may be helpful, particularly for smaller users.

### ***Changes in activity***

Breaking up long spells of DSE work helps prevent fatigue, eye strain, upper limb problems and backache. As the employer you need to plan, so users can interrupt prolonged use of DSE with changes of activity. Organised or scheduled rest breaks may sometimes be a solution.

The following may help users:

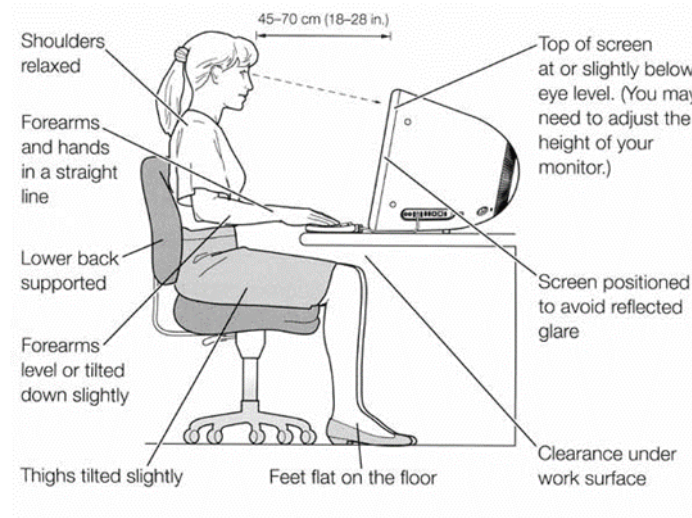
- Stretch and change position.
- Consider the distance from time to time, and blink often.
- Change activity before users get tired, rather than to recover.
- Short, frequent breaks are better than longer, infrequent ones.

Timing and length of changes in activity or breaks for DSE use is not set down in law and arrangements will vary depending on a situation. Employers are not responsible for providing breaks for the self-employed.



### 5.7.1.1 Workstation Setup and DSE

As a vital part of Health and Safety at work in the environment Bluesource Information Limited operates, it is vital for all employees to ensure a correct set up of their works stations, in the office or at home (please refer to Hybrid Working Policy). The Company, as per the Employee handbook (available on the Intranet), recommends the following set up:



(Image from <http://www.bodyinmotion.co.uk/home/work-station-assessment>)

The following is recommended by the Health & Safety Executive:

#### ***Well-designed workstations:***

##### Keyboards and keying in (typing)

- A space in front of the keyboard can help you rest your hands and wrists when not keying.
- Try to keep wrists straight when keying.
- Good keyboard technique is important – you can do this by keeping a soft touch on the keys and not overstretching the fingers.

##### Using a mouse

- Position the mouse within easy reach, so it can be used with a straight wrist.
- Sit upright and close to the desk to reduce working with the mouse arm stretched.
- Move the keyboard out of the way if it is not being used.
- Support the forearm on the desk, and don't grip the mouse too tightly.
- Rest fingers lightly on the buttons and do not press them hard.

## Reading the screen

- Make sure individual characters on the screen are sharp, in focus and don't flicker or move. If they do, the DSE may need servicing or adjustment.
- Adjust the brightness and contrast controls on the screen to suit lighting conditions in the room.
- Make sure the screen surface is clean.
- When setting up software, choose text that is large enough to read easily on screen when sitting in a normal comfortable working position.
- Select colours that are easy on the eye (avoid red text on a blue background, or vice versa).

Should you feel any pain at work in the office or feel that you need a workstation assessment, you should advise HR as the setup may not be quite right or is being used poorly, such as sitting slumped and slouched over the desk.

### 5.7.1.2 Portable computers

These same controls will also reduce the DSE risks associated with portable computers. However, the following may also help reduce manual handling, fatigue, and postural problems:

- Consider potential risks from manual handling if users must carry heavy equipment and papers.
- Whenever possible, users should be encouraged to use a docking station or firm surface and a full-sized keyboard and mouse.
- The height and position of the portable's screen should be angled so that the user is sitting comfortably, and reflection is minimised (raiser blocks are commonly used to help with screen height).
- More changes in activity may be needed if the user cannot minimise the risks of prolonged use and awkward postures to suitable levels.
- While portable systems not in prolonged use are excluded from the regulations some jobs will use such devices intermittently and to support the main tasks. The degree and intensity of use may vary. Any employer who provides such equipment still must risk assess and take steps to reduce residual risks.

The Health & Safety Executive reports that there is no evidence to suggest that DSE work will cause permanent damage to eyes or eyesight.

Should you feel that you need an eye test to ensure that you can comfortably see the screen and work effectively without visual fatigue, please contact HR.

## 5.7.2 Work from Home (or away from the office)

The Company's health and safety policy applies to hybrid workers, as per the Company's [Hybrid Working Policy](#).

The Company is legally obliged to ensure the health and safety of remote workers in the same way as office-based staff, and is therefore required to ensure that:

- all equipment is safe.
- a periodic assessment of your workstation is conducted.
- information and training on the safe use of equipment, including display screen equipment, is provided.
- relevant risk assessments are carried out and are reviewed on annual basis.

All employees who work remotely have a duty to ensure, insofar as is reasonably practicable, that they work in a safe manner and that they follow all health and safety instructions issued by the Company from time to time and where requested, complete relevant health and safety questionnaires. In addition to the "Health and Safety in the Workplace" training provided by the Company at induction, a guide to setting up and positioning a suitable workstation is available in this policy.

Those remote workers working from home should ensure that they have a basic first aid kit at home and have a facility for raising an emergency and calling for assistance, i.e., the ability to call 999, etc.

All Company owned electrical equipment will require periodic PAT testing and it is the employee's responsibility to ensure they follow any instructions from the Company and arrange for their equipment to be made available and brought into the office or other location when requested.

As hybrid working will potentially reduce the number of first aiders and fire marshals in the office at any one time, when working in the office employees must abide by Company guidelines and instructions. If no first aider or fire marshal is available, in an emergency and as appropriate, call Operations or the emergency services.

All work-related accidents or potential health and safety issues must be reported to the Operations team whether occurring remotely or in the Office.

## 5.7.3 Manual Handling

The main injuries associated with manual handling include:

- Musculoskeletal disorders (MSDs) e.g., back strain, slipped discs;
- Hernias;

- Lacerations, crushing of hands or fingers;
- Repetitive strain injuries e.g., tenosynovitis;
- Bruised or broken toes or feet;
- Various sprains and strains.

The company recognises a low risk of these injuries to occur due to the nature of work we provide, but to protect our employees we will:

- wherever possible or feasible, avoid the need for potentially hazardous manual handling by providing mechanical means or other working systems;
- where it is not possible or feasible to avoid potentially hazardous manual handling, suitable and sufficient risk assessments of the tasks involved will be carried out, with a view to reducing the risk of injury by the implementation of control measures;
- Suitable records will be kept of all manual handling assessments, which will be brought to the attention of all relevant employees.
- Suitable and sufficient instruction, training and supervision will be provided in the correct handling and lifting techniques to all employees involved in manual handling tasks.
- Employees will not be required to lift or move any loads that are beyond their individual capabilities.

The person responsible for overseeing our manual handling arrangements is the Office Manager, under the supervision of the Head of Operations.

#### 5.7.4 Slips, Trips and Falls

The Company has addressed the potential risk of slips, trips and falls during our office redesign in 2021/2022, where new office layout and cable management have been introduced to minimise this risk. This, along with good housekeeping, resulted in elimination of hazards, such as: obstructions, trailing cables, spillages, worn or raised floor coverings etc on walkways, poor office layout and storage arrangements resulting in insufficient circulation space.

London Office Risk Assessment is being carried out on annual basis to ensure all recognised risks are being dealt with in a timely manner, so far as is reasonably practicable. Risk assessments, processes, methods and controls will be developed, implemented and clearly communicated to all involved. All risk assessments must consider the hazards that could result in slips and trips and, where identified, measures must be taken to eliminate, reduce or control the risks involved. When carrying out risk assessments, account must be given to access of areas by members of the public (Visitors, contractors etc.).

Bluesource will designate a senior member of staff to oversee and implement the necessary control measures.

Bluesource will look in detail at the design of work areas and ensure regular maintenance.

Other measures that The Company introduced are:

- floor surfaces must include consideration of the slip resistant qualities and general suitability to the areas in question and the activities or processes carried out;
- regular cleaning by designated personnel (external) to floor surfaces to ensure any spillages or contamination are cleaned using a suitable cleaning agent;
- warning signs must be erected during the removal of spillages/cleaning process;
- levels of lighting must be provided and maintained in all areas and walkways;
- trailing leads must be avoided in all working areas and walkways if applicable;
- stairs and steps should have nose edgings and handrails wherever possible.

All accidents and incidents involving slips and trips must be recorded and investigated fully, with consideration being given to the underlying causes and required improvements to prevent a recurrence. Employees must report all spillages immediately to their Manager/Supervisor together with any building defects or other problems that are causing floors to be wet, slippery or uneven.

The person responsible for overseeing our slips, trips and falls policy is Head of Operations.

### 5.7.5 Working at Height - Ladders and Step Ladders

Injuries, i.e., fractures, concussion, can occur when:

- Falling when retrieving items stored at height;
- Dropping items onto others when stored at height; and
- Falling from ladders.

The company has undertaken all necessary precautions to prevent hazard of working at height to occur in our offices. It is forbidden to use chairs or desks for reaching heights; step stools/ladders should be used instead. This is applicable in all working locations (office, home, client's sites etc.). If a stepladder is used, staff should read an appropriate guide and be shown how to use it safely. If needed, please contact Operations to organise necessary training.

As the standard working duties do not predict working at heights, stepladders should only be used when absolutely necessary and after reporting the need to line supervisor. All the following need to apply when using stepladders:

- the task is low risk;
- the operative can maintain three points of contact;

- avoid holding items when climbing (consider using a colleague to pass you the object or to take an object from you);
- the ladder is clear of overhead obstructions, taking in to account the expected working height;
- ladders are clearly identifiable and subject to regular inspections;
- wherever possible, stepladders over 2 steps in height, should have a handrail;
- ladder must be placed on to a flat level surface and should not be angled sideways. They must not be placed on slippery or movable objects;
- the surface on to which the ladder/steps is to be leant against must be taken into consideration to ensure it is suitable, is stable enough and will not topple over, etc;
- the ladder or steps must not be extended or moved whilst in use and standing on them;
- the task is of short duration (under 30 minutes);
- ladders can be set at an angle not exceeding 75 degrees between the ground and the ladder (1 out to 4 heigh ratio).

Also, as a precaution, all high shelving has been minimised in the office and if existent, all heavy items (10kg and above) will be stored up to the waist hight.

### 5.7.6 Welfare Facilities

Availability of suitable and sufficient welfare facilities at all workplaces for all employees, contractors and visitors will be facilitated. This should include:

- Drinking water;
- Toilet facilities;
- Washing facilities;
- Waste disposal facilities
- Facilities for rest, preparing/eating meals, including means for boiling water.

At all facilities, a satisfactory standard will be upheld, regarding:

- Temperature;
- Ventilation;
- Cleanliness/hygiene;
- Accessibility;
- Lighting.

Arrangements must be made for convenient sanitary facilities for employees throughout the office working hours.

Arrangements and procedures for the proper use and maintenance of those facilities must be developed and communicated to all interested parties, where welfare facilities are to be shared on site between different contractors.

The person responsible for overseeing our Welfare arrangements is Head of Operations with delegated members of staff.

### 5.7.7 Hazardous Substances/CoSHH (Control of Substances Hazardous to Health)

A Hazardous Substance is any material, substance or process to be used or likely to be encountered which could be a hazard to the health of employees or others.

Bluesource's Risk assessment does not predict hazardous substances to be used in the offices by our employees. The only relevant party is our external cleaning services provider, who is solely responsible for providing all relevant CoSHH documentation.

Bluesource responsibility lies in controlling if all documents are present and kept in a paper form within cleaner's lockable storage room, accessible at all times and up to date with current standards.

The Company also requires from all staff to consult accessing the storage or using any cleaning materials. This should be arranged with Operations Team.

The following general precautions apply to the use, handling and transporting of chemicals and other hazardous substances:

- Products must never be allowed to come into contact with, for example the eyes and skin;
- Personal protective equipment and clothing must be worn, if required;
- Do not swallow materials or use in areas where food is being consumed;
- Store all products in ventilated areas away from extremes of temperatures;
- Clean up spillages instantly and dispose of waste using suitable containers;
- Materials must only be handled by authorised personnel;
- Any person using or handling chemicals and other hazardous substances who shows symptoms which may possibly have been caused by exposure to the product should immediately be removed from the area and medical advice sought. Reference should always be made to the relevant COSHH assessment and material safety data sheet.
- All accidents need to be reported according to the Accident Reporting Procedure.

### 5.7.8 Legionella

The presence of legionella bacteria in water systems can, under certain circumstances, result in the potentially fatal legionnaires disease in employees and other persons who breathe in the contaminated water droplets.

The Company has implemented arrangements to prevent the growth of legionella bacteria in water systems in accordance with the relevant Legislation (Health and Safety at Work Etc Act 1974, (HSWA Ss 2 and 3). This is including, but not limited to a regular use of water systems.

The office is deemed low risk for legionella building up and as a precaution where the shower may not regularly be used, as arranged for it to be run by the cleaner for a few minutes each clean.

These arrangements include an assessment of the risk of Legionnaires' disease and preparation of a scheme for preventing or controlling the risk are conducted by a competent contractor (cleaning services provider) and by appointed persons within Bluesource when applicable.

### 5.7.9 Control of Waste Materials

All waste materials, accrued as a result of work being performed, within the premises, or its boundaries will be disposed of in line with The Company's legal duties.

We shall ensure that any waste produced by our company, or being created on our behalf by contractors, is placed in suitable applicable waste bins whenever possible, so as to prevent this from being accessed by vermin, or vandals, who may otherwise spread it beyond this control and cause an environmental hazard.

Hazardous wastes will be controlled and dealt with using external services, where a relevant Waste Transfer Note will be provided and kept in Company's records.

Responsible for overseeing our Waste Management is Bluesource's Operations Team.

### 5.7.10 Electricity

The use of electricity in the workplace is widespread and represents a significant risk of personal injury and fire.

Unless employees hold the relevant qualifications and have been authorised, no Bluesource Information Limited employee is to undertake electrical work on any equipment or system within the workplace.

In the event of faults or hazards related to electrical equipment or installation, this should be reported to the Operations team for action immediately.



Electrical installations are subject to inspection, testing and where required maintenance, which The Company will ensure is carried out. This is including regular PAT, typically reviewed annually.

The Operations Team will ensure that any permanent or temporary (if required) electrical installations are on record and in date, and relevant certification is available.

Visual inspection of any electrical equipment under their control by personnel is required and intended to identify defects, which should be reported for corrective action to Operations Team.

In the event of an employee having problems powering equipment through such issues as a lack of integrated plug sockets, the employee should not remedy this in isolation by using extension leads, but report the situation to the Operations team.

Responsible for overseeing our Electricity arrangements is Bluesource's Operations Team.

### 5.7.11 DIY

To avoid potential issues including injury to self and others, employees are not permitted to undertake DIY type activities for the Company without being competent to do the required activity and authorised by the Head of Operations.

Such activities include and are not limited to:

- Electrical installations and alterations, including replacing fuses and plugs;
- Decorating
- Plumbing;
- Changing light fittings and bulbs;
- Cabling;
- Making alterations to the office space, fabric and structure of the building;
- Building work, except for building flat-packed furniture.

### 5.7.12 Use of heaters in Company premises

The Company has provided heating via its air conditioning units which should be sufficient to heat the office space. Where an additional heat source is required for short term use, only company approved devices must be used and the following apply:

- Must only be used as a short term solution;
- Only Company provided and checked devices must be used;
- Cabling and the device need to be placed to minimise any potential trip hazards;

- Must be kept well away from any potential combustible materials;
- Must be placed sufficiently away from persons to avoid potential burns;
- Must not be left unattended;
- Should stop being used and turned off if any potential faults, overheating or burning smells, and reported to Operations immediately;
- Must be turned off after use and not left running or in standby modes.

Such devices are not only a potential fire hazard but also could possibly cause personal injury through being a trip hazard or causing burns. Great care must be taken where such use is permitted.

### 5.7.13 Medication

Under no circumstance should a first aider or other employee issue any medication to another unless authorised to do so by a relevant competent person, such as a Paramedic or medical professional.

Where an employee carries their own medication with them, they may request reasonable assistance with taking their medication. In an emergency, where the individual is unable to instruct the administration of their medication, medical advice should be sought before issuing ... such as with EpiPens, Insulin, pills. etc.

Employees who need to carry such medications, especially for life threatening ailments, must advise HR and their Line Manager. Such details will be kept confidential except where that information is needed in an emergency situation.

### 5.7.14 Drugs and Alcohol Misuse

As alcohol and drugs may have a significant influence on employee's Health and Safety, under Company's Alcohol and Drug Misuse Policy, working under the influence of alcohol and drugs is strictly always prohibited, except where prescribed drugs are required on medical grounds and supported by medical evidence - such as DR's written advice, medical subscription, etc. The Company must be advised in advance of working and such notification should be made to your Line Manager and HR.

For further information please refer to the Company's [Employee Handbook](#).

## 5.7.15 Mental Health

This policy applies to all employees.

Bluesource is committed to achieving a healthy workforce by placing value on both physical and mental health. We also recognise that mental health issues can be triggered by excessive levels of work-related stress and it is the Company's duty of care to take measures as reasonably practicable to preserve the mental health and well-being of its employees whilst at work.

Bluesource also recognises the importance of ensuring that all employees are able to work in a supportive, professional and caring environment, where they are valued and respected. By applying these values to our work practices we aim to promote mental wellbeing and prevent stress by promoting a supportive work place culture.

The Company recognises that it is required to provide employees with a safe and healthy work environment, so far as is reasonably practicable, under the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999, HSE Management Standards for Work-Related Stress 2004 and The Equality Act 2010.

The concept of positive mental health and well-being implies a state of health characterised by emotional and spiritual resilience that allows us to enjoy life and to survive pain, disappointment, and sadness. Mental health problems can be triggered by stress arising from the workplace or outside world; mental wellbeing at work is determined by the interaction between the working environment, the nature of the work and the individual.

The Company promotes a comprehensive approach to tackling mental health issues arising from the workplace or personal circumstances by addressing prevention, management, and support. This policy requires a shared understanding between employees and managers that mental ill health can be a legitimate health issue in the workplace. Employees experiencing difficulties that could lead to them experiencing mental ill health should be encouraged to seek help and support.

### Developing an workplace culture that is open about mental health



#### Benefits of open culture

People feel comfortable to ask for help

- It's easier to put support in at an earlier stage
- Helps to reduce the stigma
- Creates a more supportive environment

#### How can managers create an open culture?

- Regular 1:1 conversations where mental health and wellbeing are discussed openly
- Wellbeing a regular agenda item in team meetings
- Raising awareness of mental health-related topics
- Publicising support options for those who may be struggling
- Acting as a role model

Employees have a duty to themselves and others to help minimise mental ill health in the workplace and should take an active part in mental well-being management initiatives. This policy should be read in conjunction with other applicable Company policies and procedures. Employees are actively encouraged to initiate discussions to assist them with any mental health issues and the Company will be introducing Mental Health First Aiders, to provide such support.

## Conversations



Bluesource will identify and detail the factors which may cause increased stress in the workplace by Risk Assessment, which will be reviewed annually.

One in six people in the UK will have a mental health problem at some point. While mental health problems are common, most are mild, tend to be short-term and are normally successfully treated, with medication, by a GP.

Mental health is about how we think, feel and behave. Anxiety and depression are the most common mental health problems. They are often a reaction to a difficult life event, such as bereavement, but can also be caused by work-related issues.

The Senior Management Team is responsible for ensuring that:

- stress, which can lead to ill health, is reduced as far as reasonably practicable in the work environment
- the organisational culture promotes a positive attitude to mental wellbeing
- suitable guidance, training and support is provided to managers to equip them to:
  - undertake the necessary risk assessments in the workplace and ensure preventative measures are implemented where appropriate
  - adopt a management approach that reduces stress and promotes wellbeing
  - information is provided for staff on positive coping mechanisms and general health improving activities within the workplace
  - advice, information, and how to access support is provided for all staff including recognising the symptoms of poor mental health

- 🔘 managers are knowledgeable in their duty of care for staff
- 🔘 supervision and appraisal systems are in place to ensure confidentiality where people can gain support in dealing with poor mental health.

Mental Health First Aiders, Managers and supervisors are responsible for:

- 🔘 adopting a management approach that reduces stress and promotes wellbeing
  - Respectful and responsible: Managing emotions and having integrity
  - Managing and communicating existing and future work
  - Reasoning/managing difficult situations
  - Managing the individual within the team
- 🔘 liaising with HR to maximise support to staff who have mental/physical health issues
- 🔘 adopting a case management approach to managing individual cases of stress (with the appropriate support from HR)
- 🔘 managing absence in accordance with the policy
- 🔘 conducting risk assessments in line with HSE Management Standards for Work-related Stress
- 🔘 involving individual staff and staff teams in identifying risks and seeking solutions
- 🔘 encouraging a workplace culture where mental well-being and physical wellbeing are regarded as equally important
- 🔘 making sure that all new staff receive appropriate induction to and training for their job
- 🔘 monitor indicators of ill health (by reviewing working hours of staff and monitoring absence and staff turnover and also carrying out exit interviews)
- 🔘 attending regular mental health training events and promoting workplace activities to promote the understanding of the benefits of positive mental health
- 🔘 facilitating team planning events
- 🔘 promoting core values within their staff team through the Code of Positive Behaviour

All staff are responsible for:

- 🔘 using the organisational support systems such as supervision, appraisal and reporting to their line manager any risk to mental health within the workplace that may pose a risk to themselves or others
- 🔘 discussing with their line manager (or HR) early if they feel they are experiencing stress (ideally before any health impact arises)
- 🔘 supporting their colleagues if they are experiencing poor mental health by encouraging them to talk to their manager, HR or GP
- 🔘 seeking support from their GP or other appropriate agencies if they have health issues
- 🔘 discussing with their manager any appropriate measures to make their work less stressful which includes using the hybrid working policy
- 🔘 recognising the principles and importance of work life balance
- 🔘 exercising their right to attend stress management courses
- 🔘 being actively involved in the risk assessment and action planning process

The Company also offers its employees Private Health Care (AXA PPP), which includes services related to Mental Health and Counselling Services. As a benefit in kind this cover is optional, but highly recommended. It is also available for employees to cover other members of their family as per Company guidelines.

The Company's MetLife Death in Service insurance, which covers all employees, also provides some occupational health and mental wellbeing support.

### 5.7.16 Pandemic

The Company recognises and accepts its responsibility as an employer and provider of services and will support the provision of safe and healthy workplace environments for all staff and such other persons as may be affected by its activities.

We will adopt health and safety arrangements for reducing the spread of respiratory infections, including COVID-19, in the workplace, in line with Health & Safety legislation, and in consideration of government guidelines.

The Aim of this Policy is to ensure that the risks of COVID-19 presented to staff are reduced to an acceptable level.

Bluesource will be responsible for:

- Conducting all our activities safely and in accordance with legislative standards and in consideration of government guidance.
- Providing safe working conditions. To ensure a systematic approach to the identification of risks and the allocation of resources to control them.
- Openly communicating on health safety and welfare.
- Applying and communicating sensible risk management and safe working practices. This will involve:
  - Regular assessment of hazards and associated risks.
  - Implementing preventive and protective control measures against those risks to an acceptable/ tolerable level.
  - Monitoring the effectiveness of those measures by the Management Team
  - Provision of information, instruction, training and home working equipment
  - Review of risk assessments, policies, procedures and practices at regular interval and where additional information is gained through changes in government guidance, monitoring or following an incident.
  - Maintain a clean workplace and provide welfare facilities
  - Ensuring the office is well ventilated through air conditioning and fresh air duct.

The Company will also:

- Ensure that staff are informed and instructed to ensure competence and awareness of health & safety measures required during COVID-19.
- Encourage and support all employees to show a proper personal concern for their own safety, for that of the people around them.
- Require staff to exercise increased due care and attention and observe safe working methods including the completion of DSE assessments.

Staff will be asked to:

- Keep in touch with the organisation in relation to both personal circumstances so that we are best placed to support any challenges that arise;
- Take personal responsibility to ensure that they have fully read and adhered to the following guidelines to protect themselves as far as possible.

### 5.7.17 Smoking at Work

With no exceptions, smoking is prohibited throughout the entire workplace, including the use of e-cigarettes, personal vaporisers and nicotine delivery systems. Any Company vehicles are also inclusive of this. Employees, contractors, or visitors are covered by this policy.

To smoke or permit smoking in a smoke-free area ('no smoking' signage is displayed) is an offence. Should anyone be seen smoking in a smoke-free area this should be reported to Senior Management.

The person responsible for overseeing our Smoking Policy is Head of Operations.

### 5.7.18 Mobile phone use whilst driving

The Company's policy on the use of a mobile phone whilst driving, is guided by Law and the concern for the wellbeing of employees and others, has adopted a total ban on the use of mobile phones whilst driving.

Accordingly, the Company does not expect or require employees to make or accept calls whilst driving. Should employees choose to accept or make calls whilst driving, they do so at their own risk and without the approval of the Company.

### 5.7.19 Visitors, Contractors, and Vulnerable personnel

Visitors are asked to sign in and out of our buildings as it is good practice and the register forms an essential part of the roll call during an emergency evacuation.

Visitors will be under the supervision of one of our members of staff/will be provided with information via signage that will assist them in remaining safe during their visit.

Contractors undertaking work within the premises will be subject to our contractor control arrangements. Bluesource and any appointed contractors have responsibilities under health and safety law. We will only use contractors who we have considered suitable to ensure the protection of all persons who their activities affect. We will:

- work with the contractors to ensure that everyone knows their roles and responsibilities in taking all necessary precautions and control measures to reduce the risks of workplace dangers where work activities are carried out.
- identify and assess risks and implement control measures required to deal with them.
- ensure that our staff and customers are kept safe by identifying the risks and making sure that the works are separated from non-essential personnel where required.
- request copies of the necessary training to evidence competence for the task from the Contractor.

The company will ensure, when notified of vulnerability (disability, special assistance needs, pregnancy, young visitors etc.) of anyone on our premises, to provide an adequate assistance and guidance in the aspect of Health and Safety. This includes, but is not limited to:

- undertaking a specific risk assessment when required
- provide support in the event of evacuation, accident by the competent person
- provide suitable facilities to address specific needs
- eliminate contact with any substances/equipment that may cause harm.

### 5.7.20 Access to the Office

As per Bluesource's Physical and Environmental Security Policy, everyday access to the office is only available for our personnel and pre-approved contractors.

After office redesign in 2021 and introducing new entry system the risk of entry of unauthorised persons into the office during and after working hours is minimal. The new entry/alarm system protects our employees and premises from unwanted guests and only allows entrance if the access is granted by a member of staff.

It is necessary for staff to be mindful of who they are letting into the office, as well as not allowing tailgating at any times.

For further information, please refer to the Company's [Physical and Environment Security Policy](#).



### 5.7.21 Emergency Contact

In the event of a companywide emergency, to get a message effectively communicated simultaneously to as many of its employees as possible and in the shortest time frame, the Company has established an emergency WhatsApp group.

This group is maintained by the Head of Operations, with the Senior Management Team its administrators. Only administrators can send messages to the group and the communication channel is one way to avoid it becoming a chat.

## 6. Enforcement / Policy Compliance

If any user is found to have breached this policy, they may be subject to Company disciplinary procedures. If a criminal offence is considered to have been committed, further action may be taken to assist in the prosecution of the offender(s).





If you do not understand the implications of this policy or how it may apply to you, seek advice from your line manager or member of the senior management team.

## 7. Policy Governance

The following table identifies who within the Company is Accountable, Responsible, Informed or Consulted with regards to this policy:

Responsible	Head of Operations
Accountable	CEO/Managing Director
Consulted	Corporate Management Team
Informed	All users (employees, temporary staff, contractors, etc)

The following definitions apply:

-  **Responsible** – the person(s) responsible for developing and implementing the policy.
-  **Accountable** – the person who has ultimate accountability and authority for the policy.
-  **Consulted** – the person(s) or groups to be consulted prior to final policy implementation or amendment.
-  **Informed** – the person(s) or groups to be informed after policy implementation or amendment.

## 8. Review and Revision


The Company recognises the need to provide periodic review of the Policy and will do so on a periodic basis not more than 12 months from the previous review. Should a policy need to be updated, a revised version will be published under version control.

Policies are also reviewed as part of the ongoing audit program conducted at planned intervals throughout the year, as per [BSCD 6 – bluesource Internal Audit Schedule](#).

It is the Company's policy not to issue a new version just for the sake of it, so where no change is required at review, a new version does not need to be created. Similarly, where a typo is corrected, a new version is not required, provided the essence of the information has not changed.

Additionally, policies are reviewed by management on an on-going basis, as part of management reviews, and if any changes are required because of planned audit activities or incidents.

## 9. Sign-Off

On behalf of bluesource	
Name	Nick Jagers
Position	Head of Operations
Signature	
Date	14 <sup>th</sup> March 2024

## 10. Revision History

Revision Date	Reviser	Description of Revision
19/6/2023	Nick.Jagers	Version "June2023" approved for publication.
15/1/2024	Nick Jagers	Mobile phone usage whilst driving moved from Employee Handbook to H&S Policy.
14/3/2024	Nick Jagers	Rebranded and Mental Health section updated.