

# Liberty International PLC Health & Safety Policy

<b>1. POLICY STATEMENT BY LIBERTY INTERNATIONAL PLC</b>	<b>3</b>
<b>2. LIBERTY INTERNATIONAL (40 BROADWAY) HEALTH &amp; SAFETY ORGANISATION CHART</b>	<b>5</b>
<b>3. RESPONSIBILITIES</b>	<b>6</b>
Chief Executive	6
Managing Directors	6
Health & Safety Committee	6
Managers	7
All Employees	7
<b>4. HEALTH AND SAFETY ARRANGEMENTS</b>	<b>9</b>
<b>4.1 THE WORK ENVIRONMENT</b>	<b>9</b>
4.1.1 General work environment	9
4.1.2 Fire safety	10
Fire precautions	10
Fire training and fire drills	10
4.1.3 Electrical safety	10
4.1.4 Work equipment safety	11
4.1.5 Work at height	12
4.1.6 Control of Substances Hazardous to Health	12
4.1.7 Manual handling	13
4.1.8 Display Screen Equipment (UDSE")	13
4.1.9 Driving safely	13
4.1.10 Asbestos at work	14
<b>4.2 HEALTH &amp; SAFETY PROVISIONS</b>	<b>14</b>
4.2.1 First aid	14
4.2.2 New and expectant mothers	15
4.2.3 Smoking	15
4.2.4 Alcohol and illegal drugs	15
4.2.5 Working Time Directive	16
4.2.6 Stress	16
4.2.7 Disability discrimination	16
<b>4.3 HEALTH &amp; SAFETY ADMINISTRATION</b>	<b>16</b>
4.3.1 Consultation with employees	16
4.3.2 Employee information and training	17
4.3.3 Accidents & incidents	17
4.3.4 Risk assessments	18
4.3.5 Emergency & contingency planning	18
4.3.6 Permit to Work	18
4.3.7 Contractors	19
4.3.8 Policy review/monitoring	19



## **1. Policy Statement by Liberty International PLC for the management of Health and Safety at 40 Broadway, London SW1H 0BT**

Liberty International PLC acknowledges and accepts its statutory responsibilities for securing the health, safety and welfare of its employees, of contractors working for the company and of other persons, including visitors. This policy covers all staff at 40 Broadway, London SW1 H 0BT whether employed by Liberty International or a subsidiary company, as responsibility for health & safety matters affecting CSC and C&C employees at 40 Broadway has been delegated by the CSC and C&C Health & Safety committees to the Liberty International (40 Broadway) Health & Safety Committee. These two major subsidiaries of Liberty International - Capital Shopping Centres and Capital & Counties - each have their own health and safety policy that should be read in conjunction with the Liberty International (40 Broadway) policy.

This Policy Statement, which is to be observed throughout 40 Broadway, reflects the importance attached to protecting the health, safety and welfare of all who may be affected by the group's business activities.

Liberty International PLC will provide and maintain safe and healthy working conditions, in particular ensuring, as far as reasonably practicable that:

- The requirements of the Health and Safety at Work Act 1974 and other relevant legislation are complied with;
- Responsibilities for health and safety are properly assigned, accepted and fulfilled at all levels;
- Adequate resources are provided to ensure that proper provision can be made for health and safety matters;
- Risks arising from its work activities are assessed, effective control measures are implemented and suitable policies and procedures are provided, implemented and regularly reviewed;
- All employees receive information, training and supervision in how to carry out their work with regard to their safety and the safety of others;
- Employees are consulted on health and safety issues and changes to new or existing work practices;
- An appropriate level of information and instruction is provided to its visitors and contractors;
- The provision and maintenance of all plant and equipment is safe and without risk to health and safety;
- The working environment is safe and without risks to health and safety and that adequate provision is made with regard to the facilities and arrangements for staff welfare at work;
- Work-related accidents, ill health and safety performance are monitored to maintain the agreed standard.

Health and Safety is a line-management responsibility. Managers must ensure that they have adequate arrangements for discharging their duties with respect to this policy statement and have procedures in place for monitoring the effectiveness of these arrangements.

All employees have a legal responsibility for their own safety and that of other persons who may be affected by their acts or omissions and to co-operate with the implementation of the health and safety policy and the integration of safety into all company activities. This includes reporting through the management chain any work

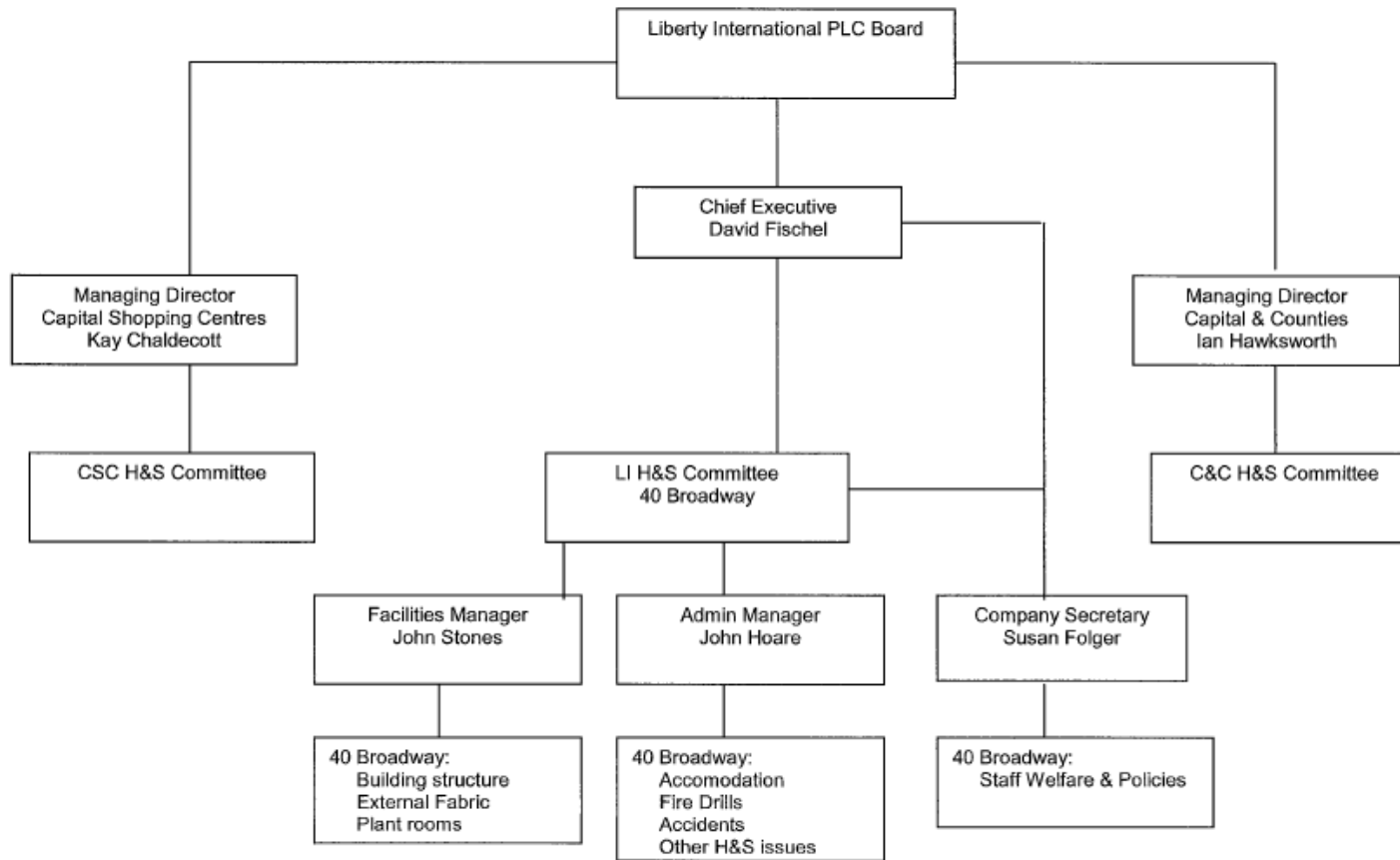
situation giving rise to serious or immediate danger to individuals, or any shortcomings in the arrangements that may create danger.

Liberty International PLC will carry out a regular review of this policy to ensure that the highest standards of health and safety are maintained, and the policy remains relevant and appropriate. This policy will also be reviewed annually, or when there is significant change to the business or relevant legislation. Any changes will be made known to all employees.

David Fischel, Chief Executive  
Liberty International PLC

January 2008

## 2. Liberty International (40 Broadway) Health & Safety Organisation Chart



### **3. Responsibilities**

#### **Chief Executive**

The health and safety of employees at 40 Broadway is the specific responsibility of the Chief Executive through executive management. The Chief Executive will ensure that managers are, as far as possible, trained and competent to fulfil their health and safety responsibilities as set out in the Liberty International (40 Broadway) Health and Safety Policy and that adequate resources are provided to enable health and safety to be managed safely within the organisation.

The Liberty International Health and Safety Policy shall also be overseen and implemented by the Liberty International Health and Safety Committee who shall report to the Chief Executive on a regular basis and will provide a formal report to the Board on a six monthly basis or more frequently as required.

#### **Managing Directors**

Managing Directors of Capital Shopping Centres and Capital & Counties have overall responsibility for health and safety within their respective business units (excluding 40 Broadway). All directors must ensure that all staff within their area of responsibility adhere to the Liberty International (40 Broadway) Health & Safety Policy and arrangements as well as the health and safety policy for their respective business units.

#### **Health & Safety Committee**

The Liberty International (40 Broadway) Health and Safety Committee is responsible for the implementation of the Health and Safety policy within 40 Broadway, The Committee shall provide a 6 monthly Health and Safety Committee report to the Board of Liberty International PLC. However urgent issues will be brought to the attention of the Chief Executive and/or the Board immediately.

Responsibilities of the Committee include:

- To have read and understood the health and safety policy and associated procedures and risk assessments relevant to the work activities;
- To provide for the carrying out of risk assessments to cover all the significant risks arising from the work activities, and the implementation of control measures identified;
- To report health and safety hazards or risks that are beyond the Committee's level of control to the Chief Executive;
- To identify areas requiring safety procedures and to make suggestions for improving health and safety standards within the Committee's area of responsibility;
- To provide for the regular monitoring of the health and safety performance of the operations, within the Committee's area of responsibility.

- As far as possible, to make provision for all employees to receive H&S information, instruction and training commensurate with their job role and responsibilities;
- Where relevant, to provide for the health and safety induction training of contractors and adequate supervision of their activities;
- To provide for the reporting and effective investigation of all accidents and incidents occurring in relation to operations within the Committee's area of responsibility and where necessary suitable risk controls are identified and implemented to prevent a recurrence,

## **Managers**

Managers have responsibility for applying the Company's Health and Safety Policy to all staff at 40 Broadway. They will ensure that all staff under their control are aware of and comply with the Company's Health & Safety Policy and all relevant policies and procedures.

- To have read and understood relevant health and safety policies and procedures and related risk assessments relevant to the work activities;
- Ensuring risk assessments have been carried out to cover all the significant risks arising from the work activities within their control, and that control measures identified have been implemented;
- Organising and co-ordinating work in accordance with legislation, codes of practice and relevant policies & procedures;
- Ensuring the health and safety performance of the operations, within their area of responsibility, are regularly monitored.
- As far as possible, ensuring all employees under their control receive H&S information, instruction and training commensurate with their job role and responsibilities;
- Where relevant, ensuring health and safety induction training for contractors is completed and their activities are adequately supervised;
- Where employees or contractors under their control are observed working in an unsafe manner or breaching Liberty International (40 Broadway) Health and Safety policies & procedures or legislation, taking appropriate action to rectify the issue;
- Ensuring all employees under their control reports all accidents/incidents;
- In the event of an accident take immediate action to make the area safe and prevent a recurrence. Accidents and incidents occurring in relation to operations within their control are reported and effectively investigated and where necessary suitable risk controls identified and implemented to prevent a recurrence.

## **All Employees**

All employees must read and understand Liberty International's health and safety policies and procedures and related risk assessments relevant to his/her work. In particular the employee must:

- Carry out their duties in a safe manner, in accordance with company policy, procedures and safe working practice;
- Be alert to hazards whilst carrying out work for the company and to make suggestions for safer work procedures as appropriate;



## **4. Health and Safety Arrangements**

### **4.1 THE WORK ENVIRONMENT**

#### **4.1.1 General work environment**

Liberty International recognises that under the Health and Safety at work etc. Act 1974 and the Workplace (Health Safety and Welfare) Regulations 1992 the company has an obligation to provide and maintain an environment that is safe to work in without risks to employees, contractors, clients and members of the public.

Liberty International will ensure that workplaces and work environments are subject to the risk assessment process.

Areas taken into account will be:

- Ventilation - to ensure that all areas within the Company's control are adequately ventilated by either means of natural or mechanical ventilation
- Heating - to ensure that all workplace temperatures where appropriate are reasonable (above 16°C), or if this is not possible tasks are rotated and/or suitable personal protective equipment provided (e.g. work in cold stores)
- Lighting - to ensure that lighting levels are suitable and sufficient for the work that is carried out
- Housekeeping- to ensure that: all furniture, fittings, walls, floors and ceilings are clean; waste material is kept in suitable containers and removed regularly by licensed contractors; workstations are all free from unnecessary paperwork; items are not left in traffic routes etc
- Storage and stacking - to confirm that: the office and surrounding environment is ergonomically designed to prevent staff over reaching or straining themselves; that items are stacked and loaded correctly; and that appropriate stepladders are available for work that is required to be done above shoulder height
- Room dimensions and space - To ensure that all rooms where persons work are adequate in size for the work being carried out and the number of persons in them
- Workstations & seating - To ensure that all workstations are suitable for use, free from trip hazards, and have appropriate seating and footrests provided where necessary
- Floors and passages - To ensure that: all floors are checked to ensure that they are free from obstructions, trip hazards and in good condition; they are treated for ice in winter conditions and an appropriate spillage procedure is adopted; stairways with more than 3 steps have handrails and are checked regularly for stability.
- Windows, glass doors etc. - To ensure that windows can be opened safely and pose no risk when they are open; all glazing has been checked to ensure it is to the appropriate safety standard and can be cleaned safely by an approved contractor; that all doors and windows are suitable for their purpose; and that electronic doors and shutters are suitably maintained
- Welfare facilities - To ensure that: toilet facilities are adequate in number with washing facilities; a wholesome supply of drinking water is provided; and there are facilities available for the storage of outdoor clothing.

- Falls - To confirm that where it is possible for persons to fall, particularly more than 2 metres, that appropriate safety precautions, such as the use of fixed barriers, have been taken
- Safety signage - To ensure that safety signs are provided to notify persons of specific hazards, such as showing the way to the nearest fire exit, prohibited procedures and warning of danger.
- Visitors - The Liberty International (40 Broadway) Health & Safety Policy applies to visitors to 40 Broadway. Visitors are entitled to see a copy of the policy on request.

Liberty International recognises that the above list is by no means exhaustive and all areas will be comprehensively considered as part of the workplace risk assessment process.

Regular monitoring for hazards in the workplace will be undertaken, and where issues are found remedial action will be implemented. A record of this will be kept.

#### **4.1.2 Fire safety**

##### **Fire risk assessment**

A fire risk assessment of 40 Broadway will be carried out in accordance with the Regulatory Reform (Fire Safety) Order 2005 by a competent person. Any recommendations from the fire risk assessment shall be implemented within the specified timescale.

##### **Fire precautions**

Fire fighting equipment, fire detection, fire alarms and emergency lighting are provided as appropriate and shall be maintained at the required frequency as specified by the manufacturer.

##### **Fire training and fire drills**

Liberty International has a documented Fire Evacuation Procedure which is displayed on notice boards throughout 40 Broadway and brought to the attention of all staff.

All employees will receive appropriate fire safety training, Fire Wardens shall be designated and appropriately trained for the role. Details of fire wardens will be displayed on notice boards throughout 40 Broadway.

A fire drill will be conducted twice in every 12 month period, the details of which will be recorded in the fire log book.

#### **4.1.3 Electrical safety**

Any work on electrical systems shall be subject to a risk assessment and where appropriate a permit to work. Only competent persons will be allowed to work on electrical systems.

## **Fixed electrical installations - inspection and testing**

The fixed electrical installation shall be periodically inspected and tested by a competent person. Any defects identified during the inspection and testing will be actioned within the specified timescales, and evidence of this will be retained.

### **Use of portable appliances**

Liberty International will ensure that, where appropriate, portable electrical appliances are only used by authorised persons, with adequate training where appropriate. Liberty International will not allow any of its portable electrical appliances to be used by any other persons.

Liberty International will ensure all portable electrical appliances and extension leads belonging to the company are maintained in a safe condition. All portable appliances will be included on a Portable Electrical Appliance Log, and will be examined and/or tested by a competent electrician at appropriate intervals. The results of all such examinations and tests will be recorded along with the next test date.

Where defective portable appliances are found, they will be taken out of use immediately and disabled, e.g. by removing the plug fuse, until such a time as they can be repaired, Any action taken will be recorded in a defects log to form part of the Company's due diligence defence.

Liberty International will also arrange for electrical equipment and appliances to be visually examined regularly to check for obvious faults and defects.

#### **4.1.4 Work equipment safety**

All work equipment will be subject to a risk assessment and the significant findings brought to the attention of relevant employees. Additionally, to ensure work equipment is safe to be used Liberty International will ensure that the following principles are followed:

- Work Equipment will be suitable for the purpose and the circumstances it is to be used in. To determine this, an assessment of equipment will be carried out before it is used. It will be installed, located and used so as to minimise risk to operators and other employees/visitors in the area;
- Controls will be readily recognisable, easy to use and suitable for purpose, Appropriate means of isolation will be available where necessary, including readily visible emergency stops;
- It will be maintained in an efficient condition and safe working order. In order to achieve this, the equipment needs to be designed and installed appropriately. Some items of work equipment will require regular maintenance as specified by the supplier or manufacturer. High risk work equipment will have a detailed Maintenance Log;
- A Competent Person will inspect work equipment at intervals recommended by the manufacturer or legislation, This is to ensure that the equipment can be operated, adjusted and maintained safely where there is a significant risk of injury as a result of incorrect installation or deterioration;
- Adequate information, instruction and training will be given to the operator or user covering safe use, the risks and their control measures. Such training will be recorded.

Liberty International acknowledges that everyone is responsible for the safe use of work equipment, and will ensure that employees are made aware of the following:

- Employees must only use work equipment for which they have been trained and authorised
- Employees must visually check the item of equipment before they use it.
- Employees must always follow manufacturers instructions and guidance that is supplied with or marked onto the equipment
- Employees must report any defects with work equipment to their manager and ensure the equipment is taken out of use or a sign attached stating 'Out Of Order-Do Not Use'

#### **4.1.5 Work at height**

Liberty International will ensure that all work at height is subject to a risk assessment and method statement.

##### **Use of ladders and stepladders**

Ladders will only be used for work of short duration where no alternative is available. Employees using ladders shall be adequately trained in their use and safe working practices.

Ladders will be individually marked with an identification number and entered on a maintenance schedule. All ladders will be regularly checked and maintained as appropriate.

##### **Elevating platforms/mobile scaffold**

The use of elevating platforms and mobile scaffold will only be undertaken by appropriately trained contractors as and when required, who are in possession of a valid Permit to Work.

##### **Work on roofs**

Work on roofs will be risk assessed prior to works being carried out.

Work on roofs will be limited to competent authorised employees or contractors and will be subject to a permit to work.

Where appropriate, edge protection will be provided where work is required within 2 meters of the roof edge and where this is not feasible an alternative man safe system shall be provided.

#### **4.1.6 Control of Substances Hazardous to Health**

To help achieve compliance with the COSHH regulations Liberty International will initially undertake a review of the chemicals and substances within the workplace. Hazard data sheets will be obtained for the substances used and where necessary specific COSHH assessments will be undertaken, A copy of the assessments will be held in an accessible location.

Employees who use hazardous substances will receive training in the safe use of all hazardous substances and other chemicals used in the workplace and will be issued with appropriate personal protective equipment as detailed in the COSHH assessment.

Prior to appointing contractors who intend to work on the premises and use substances hazardous to health, Liberty International will expect the contractors to produce written COSHH assessments for those substances.

#### **4.1.7 Manual handling**

Liberty International is committed to ensuring that where possible manual handling activities are not undertaken. In conjunction with this, and where it is reasonably practicable to do so, activities will be mechanised.

Where manual handling cannot be avoided, and presents a risk of injury, a Manual Handling Operations Assessment will be carried out. Actions required as a result of the assessment will be implemented where it is reasonably practicable to do so.

Appropriate training in manual handling will be provided where applicable, and always where found to be required further to a manual handling assessment. This will cover safe handling techniques, manual handling risk factors and injuries, safe systems of work for handling, safe use of mechanical aids, and practical application as necessary.

#### **4.1.8 Display Screen Equipment ('DSE')**

Liberty International will ensure that all DSE users are identified and a subsequent DSE assessment carried out, a copy of which will be retained. Any control measures deemed necessary as a result of the assessment will be implemented and a record kept. The findings of the assessment will be reviewed regularly, and when circumstances change, for example, during office refurbishments.

Liberty International recognises that DSE users are entitled to request an eyesight test paid for by Liberty International. If the test reveals that the employee requires corrective lenses in order to carry out DSE work, Liberty International will pay for a pair of glasses up to a specified amount. If the user wants a more expensive pair then they must pay the extra amount themselves.

#### **4.1.9 Driving safely**

Liberty International will endeavour to ensure that driving on company business is effectively managed by the organisation.

Liberty International do not actively promote driving on company business and alternative means of transport are encouraged, for example the use of public transport.

All employees who drive on behalf of the company, either in private or company vehicles will have a valid driving licence suitable for the class and type of the vehicle they drive.

Company vehicles will be subject to maintenance and servicing in accordance with manufacturer's instructions via the fleet management leasing company. Additionally, regular checks are carried out on the roadworthiness of all Company vehicles (e.g. tyre pressure and condition (including spare); correct functioning of lights; oil, coolant, brake fluid and windscreen washer fluid levels; damage to windscreen), Records of these checks are kept. Further, employees are instructed on how to carry out these checks themselves, and reminded to undertake them.

Employees must not use hand held mobile phones to make or receive telephone calls or send text messages whilst driving.

#### **4.1.10 Asbestos at work**

Liberty International recognises that it has a duty to manage asbestos within 40 Broadway,

Asbestos surveys have been undertaken by an independent specialist consultant.

An asbestos management plan has been compiled to implement the recommendations of the surveys within the specified timescales, and to manage any asbestos containing materials on an ongoing basis. An Asbestos Register and Plan is available.

The management plan is kept up to date to show any changes that could affect the risk.

Any person carrying out work on the building at 40 Broadway is made aware of the Asbestos Register and Plan identifying the location of asbestos, or materials assumed to be asbestos containing materials.

Work on or near asbestos containing materials are made subject to a risk assessment and a permit to work.

## **4.2 HEALTH & SAFETY PROVISIONS**

### **4.2.1 First aid**

Liberty International will ensure an appropriate number of first aiders are appointed and adequately trained within 40 Broadway. Details of appointed first aiders will be displayed on each notice board within the building.

A first aid kit will be provided on each floor of 40 Broadway and will be checked and kept stocked on a regular basis by the Administration Manager, A notice will clearly show where first aid boxes are kept.

#### **4.2.2 New and expectant mothers**

Liberty International will consider the hazards in the workplace that could pose health and safety risks to new and expectant mothers and take appropriate action to remove or reduce the risk.

When Liberty International receives written notification from an employee that she is pregnant, has given birth within the previous six months or is breastfeeding, then a competent person will conduct a specific risk assessment identifying the hazards and considering the risks.

This will involve a review of any other assessments that had been previously carried out, including General Work Risk Assessments, Manual Handling Assessment, COSHH Assessments and Display Screen Equipment Assessments. The assessment will take into account any advice provided by the woman's GP or Midwife on her health and must be written.

If any risks are identified then Liberty International will take action to remove, reduce or control the risk. If the risk cannot be removed the Liberty International will:

**Action 1**

Temporarily adjust her working conditions and/or hours of work; or if that is not possible

**Action 2**

Offer her suitable alternative work (at the same rate of pay) if available; or if that is not feasible

**Action 3**

Suspend her from work on paid leave for as long as necessary to protect her health and safety and that of her child.

Liberty International will consult with the expectant mother during pregnancy to establish if she is experiencing further difficulties or if there are any new risks to her health and safety and if necessary will review the risk assessment. Notwithstanding this, a review will be carried out for each trimester of a pregnancy.

In addition to the above, Liberty International will ensure there is a suitable area within the workplace where a new or expectant mother can take a break and rest.

#### **4.2.3 Smoking**

The Company operates a no smoking policy throughout the building and smoking by employees is not permitted outside the front of the building.

#### **4.2.4 Alcohol and illegal drugs**

Consumption of illegal drugs or excessive consumption of alcohol is not permitted before or during employee hours of work, including lunchtimes. Nor must employees be under the influence of alcohol or illegal drugs during working hours or whilst conducting any business on behalf of the Liberty International Group.

#### **4.2.5 Working Time Directive**

Liberty International will take all reasonable steps to ensure that employees are not required to work more than an average of 48 hours a week based on a 17 week period, unless they have signed an opt-out agreement.

Where employees who have not signed an opt out agreement are identified as working more than a 48 hour week, Liberty International will take appropriate steps to reduce that persons working hours where possible.

#### **4.2.6 Stress**

Liberty International is committed to the health, safety and welfare of its employees and recognises that workplace stress is a health and safety issue. Liberty International acknowledges the importance of identifying and reducing workplace stressors.

Managers are expected to consult with Personnel where employees demonstrate symptoms which could be related to stress with a view to identifying and reducing workplace stressors where possible.

#### **4.2.7 Disability discrimination**

Liberty International endeavours to ensure that disabled persons are not discriminated against. Liberty International has carried out an access audit for 40 Broadway, by an independent specialist advisor. An action plan was drawn up to implement the audit findings. This included steps to:

- Remove physical barriers as far as was practicable
- Alter them so they are no longer a problem
- Find a way of avoidance
- Provide services by another reasonable means

Liberty International recognises that this was not a 'one off' project to achieve compliance. Compliance is a continuing duty year on year, which will take into account that expectations will continue to rise and what is considered 'unreasonable' today may not be seen as such in the future.

### **4.3 HEALTH & SAFETY ADMINISTRATION**

#### **4.3.1 Consultation with employees**

Liberty International acknowledges its responsibility to make available to all employees information relating to their Health and Safety at work. In particular, employees will be advised about:

- The introduction of any measure at the workplace, which may substantially affect the Health and Safety of those employees;

- The arrangements for appointing/nominating persons to assist the employer in complying with relevant legislation and to assist in emergency procedures as required by regulations 7 and 8 of the Management of Health and Safety at Work Regulations 1999;
- The arrangements for appointing or nominating persons in accordance with The Management of Health and Safety at Work Regulations 1999;
- Any Health and Safety information required to be provided under the relevant statutory provisions;
- The planning and organisation of any relevant Health and Safety training;
- The Health and Safety consequences of the introduction of new technology.

Liberty International has established a Health and Safety Committee for 40 Broadway to comply with the provisions of the Health and Safety (Consultation with Employees) Regulations 1996, No trade union has been recognised by Liberty International.

The Liberty International (40 Broadway) Health and Safety Committee will consider the following:

- Review health and safety performance across the building;
- Disseminate and discuss health and safety issues of relevance to 40 Broadway;
- Oversee the implementation of risk assessments and the introduction of common policies and procedures throughout 40 Broadway;
- Assess and implement health and safety training needs;
- Review, on an annual basis, or more frequently when changes in legislation or circumstances demand, health and safety policies, procedures and arrangements.

#### **4.3.2 Employee information and training**

Liberty International will identify the skills and knowledge needed for people to do their job in a safe and healthy way. These will be compared against people's current skills and knowledge to identify the gaps. Additionally, the following will be considered:

- The Company's experience of injuries, near misses or cases of ill health
- The findings of risk assessments-these will be reviewed to see where information and/or training have been identified as factors in controlling risks
- Employees or their representatives views, further to consultation
- The current awareness levels of directors, managers and supervisors, with respect to health and safety,
- The need for refresher training.

Training will be prioritised in accordance with legislative requirements, the risk level associated with the training need (Le, where there is a high risk of harm if training is not carried out), and employees' views and perceptions, Induction training and job training for new employees or those changing job roles will also be considered a high priority.

#### **4.3.3 Accidents & incidents**

All accidents and incidents should be reported to the respective line manager and also to the Personnel Manager, The accident book is available from reception on the ground floor, All accidents will be recorded in the accident book by the Personnel Manager and shall be investigated as appropriate by the Health & Safety Manager. Records relating to accidents and incidents are kept by the Personnel Manager.

RIDDOR notifiable accidents, diseases and dangerous occurrences will be reported to the Incident Contact Centre on 0845 300 9923 where necessary by the Health & Safety Manager Details of reportable accidents are kept by the Health & Safety Manager.

Liberty International recognises that the monitoring and review of accident statistics and trends can provide important information when judging the effectiveness of the Health and Safety Management system, and identifying where Health and Safety documentation and practices require improvements, Accidents and incidents shall be reviewed by the Health and Safety Committee on a six monthly basis.

#### **4.3.4 Risk assessments**

Managers will be responsible for producing risk assessments for areas within their responsibility.

Liberty International will ensure that those who are responsible for undertaking risk assessments are adequately trained.

#### **4.3.5 Emergency & contingency planning**

A disaster recovery plan is in place to cover all areas of risk identified which may result in prevention of access to 40 Broadway. The disaster recovery plan has been communicated to all relevant people i.e. employees, contractors etc.

#### **4.3.6 Permit to Work**

Liberty International will ensure that a Permit to Work is issued for all high risk work activities by a competent authorised person. The following high risk types of work will be subject to a permit to work:

- All roof work,
- All work on atria, cupolas, canopies and other such high level glass or fragile structures,
- All excavations and excavation work.
- All demolition work,
- All confined spaces.
- All work on pressure systems,
- The use of all cartridge tools.
- All hot work (including the use of asphalt and bitumen boilers).
- All welding and flame cutting,
- All work on live electrical systems or systems above 240v where workers are exposed to live conductors,

- All cranes, hoists, and tower access equipment (but not goods lifts and passenger lifts).
- All overhead work that includes the use of scaffolding, tower scaffolding and mobile elevating platforms,
- The use of flammable and highly flammable liquids (except for cleaning and decorating materials).

And/or

Where it is shown by risk assessment that a Permit to Work is necessary for:

- Work where there is a high risk of injury (such as exists in working with or near live electricity) or where it is not sufficient to rely upon either human behaviour or systems of work,
- All usually straightforward operations that may interact with others to cause a serious hazard.
- All maintenance work that can only be carried out if normal control measures are removed.
- All work which itself produces new significant hazards.

#### **4.3.7 Contractors**

All contractors will be expected to comply with the Liberty International (40 Broadway) Health and Safety Policy and must ensure that their own Company Health and Safety Policy is made available whilst work is carried out. Risk Assessments/Method Statements/COSHH Assessments will be required 72 hours before contractors carry out works at 40 Broadway (except emergency work).

All contractors employed to work at 40 Broadway will be appraised and approved for the work they carry out.

#### **4.3.8 Policy review/monitoring**

All policies developed for use by Liberty International are subject to audit and performance review to ensure that they are suitable and current to the working of Liberty International. Review of all policies will take place at least annually or at any other period considered necessary.

To check our working conditions and ensure our safe working practices are being followed, Liberty International will monitor the health and safety standards within 40 Broadway. This is the responsibility of company management as set out in the responsibilities section of this policy.