

# Policy

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## Health & Safety

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### Introduction

This is the general health and safety policy of Mills & Reeve LLP (the firm).

The firm is committed to the delivery of its obligations under health and safety legislation. The objective of this policy is to identify and take steps to minimise health and safety risks with the aim of reducing accidents and enabling the firm to comply with its legal obligations.

The firm aims to actively encourage safe working habits amongst its employees and to assist all its employees in understanding their own duties in relation to health and safety in the workplace.

The policy is arranged in three parts:

- General statement of health and safety.
- Organisational structure and responsibilities for the management of health and safety.
- Arrangements for the implementation of health and safety.

This policy is supported by detailed policies, procedures and guidelines which have been identified as necessary to protect the safety and health of employees and others given the nature of the undertaking.

## General statement of Health & Safety Policy

The firm is committed to fulfilling its duties as an employer to protect the health, safety and welfare of its employees, visitors and others who may be affected by its undertaking, in so far as is reasonably practicable.

Health and safety is seen as a fundamental managerial responsibility of equal importance to other management activities and objectives. As such it is expected that health and safety will be managed to the same high standards as any other activity within our business. Success in this area is critical to achieving our corporate goals. The firm recognises the fact that health and safety has positive benefits to the organisation and commitment to a high level of safety makes good business sense.

It is the firm's policy to establish and maintain systems of work, work equipment and working conditions that are safe and healthy. The proactive management of health and safety within the workplace is seen by the firm not only as a legal duty but also as good practice which will help prevent work-related accidents and ill health, increase employee morale and motivation, and lead to a reduction in unnecessary financial loss.

We will protect employees and others from foreseeable work hazards and will enlist the active support of employees in achieving such conditions. Every employee, at whatever level must be concerned about safety and will be expected to act responsibly at all times, doing all that they can to avoid injury to themselves and others. It is their duty to read, understand and comply with the contents of this policy and to work in accordance with any training or information they have been provided with.

The National Service Line (NSL) Leaders and Support Service Heads in each business unit are responsible for working towards a safe working environment and, working closely with the Health and Safety Advisor, will undertake personal responsibility for the assessment and subsequent control of health and safety risks which may arise out of his/her team's activities.

In recognition of our responsibilities under the Health and Safety at Work, etc. Act 1974 and other legislation relevant to our operations, the firm commits itself to:

- (i) Promote standards of health, safety and welfare that will, as a minimum, comply with the provisions and requirements of the Health and Safety at Work, etc. Act 1974, all other statutory provisions and Codes of Practice relevant to our undertaking as well as our own firm standards
- (ii) Make available such resources in the form of finance, equipment, personnel and time as are necessary to fulfil this policy
- (iii) Provide and maintain appropriate systems to ensure a safe and healthy working environment and to protect employees and others from harm, in so far as is reasonably practicable
- (iv) Provide all employees, including temporary staff, with sufficient information, instruction, training and supervision that they need to work safely and efficiently, and to develop safety awareness among our employees
- (v) Define individual responsibilities for health and safety matters
- (vi) Provide and maintain a system to ensure that accidents and 'near misses' are fully investigated and appropriate action taken to reduce the likelihood of their recurrence
- (vii) Encourage full and effective joint consultation on all health and safety matters
- (viii) Conduct periodic reviews and revise the policy where necessary to ensure it remains relevant and effective, and to make policies easily available to all employees.

In deciding what is 'reasonable' we will take into account business, economic and work constraints but will not compromise on safety.

We must continuously use our skills to make all of our facilities, new and old, as free as is reasonably possible of hazards which could cause injury or ill health. This policy has full support from the Managing Partner the Board and the Central Operations Group.

## Organisational structure and responsibilities for the management of health and safety

### 1 Purpose & Scope

- 1.2 As the general health and safety policy for the firm this document outlines how health and safety will be incorporated into its management structure and the responsibilities that it implies for employees at all levels within the organisation. The document explains the organisation and arrangements through which the policy is implemented and demonstrates the firm's commitment to discharge its safety responsibilities.
- 1.3 The policy applies to, and will be made available to, all existing permanent employees, contract and temporary staff working for the firm and covers office-based, mobile and home workers.
- 1.4 Health and Safety Representatives are responsible for producing their own site specific risk assessments and procedures within the guidelines of the firm's general health and safety policy, which should outline the local organisation, responsibilities and procedures in place in their particular office.

### 2 Legislation

- 2.1 The principal legislation governing this procedure is contained in, but not limited to:
  - 2.1.1 The Health and Safety at Work, etc Act 1974
  - 2.1.2 Management of Health and Safety at Work Regulations 1999 (SI 1999/3242)
  - 2.1.3 Workplace (Health, Safety and Welfare) Regulations 1992 (SI 1992/3004) - including the provisions of the Health and Safety (Miscellaneous Amendment) Regulations 2002 (SI 2002/2174)
  - 2.1.4 Occupiers Liability Acts 1957 and 1984
  - 2.1.5 Employers Liability (Compulsory Insurance) Act 1969
  - 2.1.6 Employers Liability (Compulsory Insurance) Regulations 1998

### 3 Definitions

- 3.1 For the purposes of this policy the following definitions apply:
  - 3.1.1 "Reasonably practicable" means there is a balance between the cost of protective measures and the benefits derived. Where the cost is deemed not to be excessive in relation to the benefits the measure shall be considered reasonably practicable to implement.
  - 3.1.2 "Hazard" means anything which has the potential to cause harm.
  - 3.1.3 "Health and Safety Advisor" means the Mills & Reeve Director of Facilities.

### 4 Responsibilities

- 4.1 In order to ensure that health and safety is successfully managed within the firm, the following responsibilities have been allocated (and are further defined in Appendix 1 where appropriate):
  - 4.1.1 The Managing Partner is ultimately responsible for the success of health and safety management within the organisation and as such gives his full support to the content of this policy. He/she ensures the Board is kept informed of, and alert to, relevant health and safety risk management issues.

- 4.1.2 The Board must give their full support to this policy to ensure that all practical measures are taken and appropriate resources are made available in respect of enhancing safety through effective risk identification and control.
- 4.1.3 NSL Leaders, Support Service Heads and staff with management responsibility must give their full support to the policy and assist in ensuring its complete implementation within their areas of responsibility.
- 4.1.4 Employees are expected to make themselves familiar with this policy and to take reasonable care for their own health and safety, together with that of colleagues and third parties who may be affected.
- 4.1.5 The Health and Safety Advisor will monitor the overall success of the policy and will ensure that the content is updated where appropriate.
- 4.1.6 The Health and Safety Manager and Health and Safety Representatives have responsibility for supporting the implementation of this policy by ensuring that it is carried out in all offices. They should work in conjunction with the Health and Safety Advisor and others appointed to assist in health and safety management to allow them to fulfil their duties.

## 5 Consultation and communication with employees

- 5.1 The firm recognises that employee involvement in health and safety in the workplace is an integral part of ensuring that high standards are reached and maintained. The firm is also committed to complying with the requirements of The Safety Representative's and Safety Committees Regulations 1977 and the Health & Safety (Consultation with Employees) Regulations 1996 relating to consultation.
- 5.2 Safety representatives
  - 5.2.1 The firm has established a process for employee consultation comprising representatives from the firm's offices to openly discuss any aspect of health and safety and to contribute in solving any problems which may arise.
  - 5.2.2 The firm has established a Health and Safety Committee with representation from across the firm. This is chaired by the Health and Safety Manager.
  - 5.2.3 The arrangements for employee consultation and communication are through the Safety Committee (as defined in 5.3) and the health and safety section of the firm's intranet, Mercury.
  - 5.2.4 The safety representative's roles and responsibilities are found in Appendix 1.
- 5.3 Safety committee
  - 5.3.1 A safety committee (the "Safety Committee"), headed by the Managing Partner has been established to ensure that the firm's health and safety duties are considered and acted upon where necessary. It meets twice a year.
  - 5.3.2 The Safety Committee is intended to assist in the process of consultation with employees to support the HR Director in ensuring the policy is implemented and risk management issues are raised at Board level. Its regular duties will include:
    - (i) Reviewing information from managers and the Health and Safety Advisor.
    - (ii) Commenting on safety standards and practices.
    - (iii) Making recommendations for improvements.
    - (iv) Working with the Health and Safety Advisor to keep employees informed of safety matters.

## Arrangements for the implementation of health and safety

### 6 Health and safety training

- 6.1 Health and safety training is incorporated in annual training programs as well as induction training. Health and safety training needs will therefore be identified through risk assessment and performance reviews, and be planned for in the same manner as other training.
- 6.2 The following areas of health and safety training will be given priority:
  - 6.2.1 Managers' training – to equip them with an understanding of their duties under Health and Safety law and their responsibilities under this policy.
  - 6.2.2 Health and safety roles – specific training will be provided for all those identified as having specific health and safety responsibilities, this will include the Health and Safety Advisor, Health and Safety Manager, Health and Safety representatives, first aider and, fire marshalls, to enable them to discharge their functions.
  - 6.2.3 Employee and induction training – to new joiners with an understanding of their duties under health and safety law and their responsibilities under this policy.
  - 6.2.4 Update training – to acquaint employees at all levels with new requirements or hazards. Training will be conducted at the expense of the firm and wherever possible will be carried out during normal work hours.

### 7 Health & Safety arrangements

- 7.1 Health and safety procedures
- 7.2 Health and safety procedures are developed and implemented to support the Health and Safety policy. The procedures are written by the Health and Safety Advisor with the assistance of the Health and Safety Manager. They are revised when there is a significant change to the firm or working practices or changes to Legislation..
- 7.3 The procedures are approved by the Managing Partner.
- 7.4 Reporting health and safety hazards
  - 7.4.1 It is the responsibility of every employee to report any condition that may represent a hazard as soon as it is practicable.
  - 7.4.2 Health and safety concerns, however minor, including matters relating to building safety and in common areas (such as staircases, corridors etc.) should be reported in the first instance to your line manager or the local Facilities Manager, for investigation.
- 7.5 Risk assessment
  - 7.5.1 The firm will ensure that all areas of its undertaking are subject to a suitable risk assessment to identify potential hazards and to introduce control measures to eliminate or reduce harm.
  - 7.5.2 Health and Safety Representatives at each office are responsible for health and safety risk identification and control.
- 7.6 Workplace
  - 7.6.1 The firm will ensure that all areas of its undertaking are subjected to a suitable assessment to determine the maintenance, cleaning and housekeeping programmes required to assist in providing safe and efficient working environments at each of its offices. Wherever possible maintenance programmes will include a preventative as well as reactive element and it is the firm's aim to comply as a minimum with the appropriate legislation.

- 7.6.2 Health and Safety Representatives at each office are responsible for ensuring that they establish and comply with a suitable maintenance, cleaning and housekeeping regime in line with the standards of general workplace operation defined in the Workplace (Health, Safety and Welfare) Regulations 1992.
- 7.7 First aid
- 7.7.1 It is the firm's policy to make provisions for first aid in accordance with the Health and Safety (First Aid) Regulations 1981. Health and Safety Representatives at each office will ensure that a risk assessment is made of work activities and that the relevant requirements are made for providing first aid and health screening.
- 7.7.2 Health and Safety Representatives at each office will bring these arrangements to the attention of all employees in the office including the names of trained first aiders.
- 7.8 Accident and incident reporting
- 7.8.1 It is the aim of the firm that no employee should be subjected to any reasonably preventable injury, no matter how slight the consequences may be. In all accident cases first aid will be rendered without delay. However, it is important that all accidents and incidents or 'near misses' with the potential for injury (whether that injury actually occurred or not) are reported to a First Aider and the local Facilities Management team without delay. Further investigations will take place where appropriate. The Health and Safety Advisor will be responsible for reporting accidents where required to do so under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.
- 7.8.2 Each office will publicise a list of current first aiders through Mercury and office noticeboards. Reception will also have a copy of the list of first aiders in the building.
- 7.9 Fire and emergency arrangements
- 7.9.1 Each office will follow a standard fire safety programme with the objective of guarding against the outbreak of fire and to ensure, in so far as is reasonably practicable, the safety of persons on the premises in the event of the outbreak of fire or other emergencies.
- 7.9.2 The fire safety programme at each office will include conducting a fire risk assessment, establishing a fire safety plan and providing relevant training.
- 7.9.3 The fire risk assessment will identify potential fire hazards and the control measures needed including the requirements for fire prevention, detection and protection.
- 7.9.4 The fire safety programme at each office will include:
- (i) Identification and installation of appropriate fire detection, alarm and fire-fighting equipment including procedures for its regular inspection, testing and servicing in line with the relevant British Standards.
  - (ii) An evacuation plan to be used in the event of fire or other emergencies.
  - (iii) Individual responsibilities with respect to emergency evacuation including the names of the office fire coordinator and fire marshals.
  - (iv) Arrangements for the training of those with responsibilities in respect of fire safety, together with the provision of training and written details of the emergency evacuation procedures to all members of staff at regular intervals.
  - (v) an office fire evacuation plan
  - (vi) Procedures for handling other emergencies relevant to the office.
- 7.10 Non-employees in office

- 7.10.1 The safety and welfare of visitors to the firm's premises is of equal concern to the firm and as such it is the policy of the firm to bring to the attention of all visitors relevant safety information appropriate to the office they are visiting.
- 7.10.2 It is the responsibility of the Health and Safety Representatives at each office to develop and implement detailed visitor safety and security arrangements relevant to their operation.
- 7.11 New and expectant mothers at work
- 7.11.1 It is the policy of the firm to ensure that risk assessments take into account new or expectant mothers in order to identify any activity which may adversely affect their health and safety or the health and safety of their unborn baby.
- 7.11.2 Where a risk assessment identifies an unacceptable risk to a new or expectant mother, the relevant manager, in conjunction with the local HR department, will seek to find alternative duties for the employee.
- 7.11.3 In cases where safe alternative duties cannot be found the firm's HR department is responsible for developing a procedure for special leave for new and expectant mothers.
- 7.11.4 Upon you notifying the firm that you are pregnant, the firm will arrange to complete an individual health and safety risk assessment with you. If, as part of this assessment, your job, or an element of your job, is identified as carrying a risk for you or your unborn child, you will be notified immediately and arrangements will be made to remove those risks. The Maternity Leave policy is available on Mercury under Human Resources.
- 7.12 Young persons at work
- 7.12.1 It is the policy of the firm to conduct risk assessments where young persons are working on premises and to introduce, where appropriate, additional training and supervision to prevent injury or illness wherever reasonably practicable to do so.
- 7.12.2 A detailed procedure is found in the Young Person's guidance located on Mercury.
- 7.13 Inspections
- 7.13.1 A safety inspection programme covering health and safety matters will be established and implemented at each office. This will form an effective part of monitoring the general health and safety policy.
- 7.13.2 The inspections will be conducted by the local Health and Safety representative. The office inspections will be conducted regularly and documented. Data from inspections will be presented to the Board on an annual basis.
- 7.14 Performance monitoring
- 7.14.1 In order to assess the ongoing success of the policy, performance monitoring must occur at each office on a regular basis. The information gathered will be forwarded to the Health and Safety Advisor for review by the safety committee.
- 8 Safety policies**
- 8.1 Through the process of risk assessment, potential hazards will be identified at each of the firm's offices. Where appropriate, detailed policies and procedures will be developed at individual offices to support the general health and safety policy.
- 8.2 The following are risks that may require more detailed policies and/or guidance to be established to introduce measures to control them:
- 8.2.1 biological agents (for example legionella in water systems)
- 8.2.2 catering facilities, including vending

- 8.2.3 cleaning or maintenance (as part of an operational or manufacturing process)
  - 8.2.4 compressed air or gas use
  - 8.2.5 contractors
  - 8.2.6 construction work (where this is under your direct control)
  - 8.2.7 display screen equipment
  - 8.2.8 driving at work
  - 8.2.9 electricity or electrical equipment (including electrical testing – fixed wiring and portable appliance)
  - 8.2.10 lone working
  - 8.2.11 manual handling
  - 8.2.12 mechanical lifting operations (use of pallet or fork lift trucks)
  - 8.2.13 pressure systems
  - 8.2.14 stress
  - 8.2.15 use of specialist work equipment and moving plan
  - 8.2.16 Working from height (including use of scaffolding, mobile towers or ladders).
- 8.3 The full policies can be found on Mercury. Each office will ensure that a risk assessment is made of work activities and that the relevant requirements are made for eliminating or controlling hazardous substances.

## 9 Policy monitoring and review

- 9.1 The Health and Safety Advisor will monitor the success of the policy and will conduct audits on a yearly basis to measure compliance with health and safety guidance at all the firm's offices. The Health and Safety Advisor will issue a report to the Managing Partner and the Board recommending any appropriate actions.
- 9.2 The policy will be formally reviewed and updated every two years by the Health and Safety Advisor, or sooner if deemed appropriate, or by reasonable request.
- 9.3 Any subsequent amendments brought about by a review will go through the normal health and safety amendment process defined below.

## 10 Policy record keeping

- 10.1 A central record system will be established and maintained whereby all new policies and document revisions are reviewed and approved by a nominated point within the firm. All new policies and procedures will be reviewed and approved by the Health and Safety Advisor.

## Appendix 1

### **Duties and responsibilities of Managing Partner (the Director responsible for health and safety at Board level). The Managing Partner shall:**

- Ensure all relevant Board decisions reflect the firm's health and safety policies.
- Ensure health and safety performance is reviewed regularly by the Board and that they are kept apprised of safety risk management matters.
- Seek Board authority where appropriate in support of the management of health and safety.
- Ensure health and safety matters are properly represented and addressed at both Board level and throughout the organisation.



- Ensure arrangements are in place for consultation with employees on health and safety matters and that employees are actively encouraged to participate in establishing and adhering to safe working practices.
- Set a personal example.

## **Duties and responsibilities of NSL, Support Heads, Managers and staff with management responsibility who shall:**

- Have an understanding of the application of the Health and Safety at Work, etc. Act 1974 and other legislation relevant to the firm's operation, with support from the Health and Safety Advisor.
- Co-operate with the firm's requirements at all times including the implementation of any recommendations made by the Health and Safety Advisor.
- Allow resources as may be necessary, to fulfil the policies are made available.
- Ensure all business decisions reflect the corporate health and safety policies including investment in new plant, premises, work practices or products.
- Allow for management systems to be established to enable employees to receive information, instruction, training and management as may be required by their job and are trained in safe methods of work appropriate to their tasks.
- Ensure that every employee under their control has received adequate training and information relating to the work they are expected to do and is at all times conforming to their training, with support of the Health and Safety Advisor.
- Ensure that no person shall order or authorise the use of any new materials or equipment without first obtaining information and guidance from the Health and Safety Advisor.
- Ensure that no person within their area of responsibility intentionally or recklessly interferes with or misuses anything provided in the interest of health, safety and welfare.
- Assist the Health and Safety Advisor in identifying all hazards associated with any activity within their area of control.
- Liaise with the Health and Safety Advisor for the reporting of any incidents, accidents or other occurrence which might render the control measures ineffective.
- Set a personal example.

## **Duties and responsibilities of employees who should:**

- Make themselves familiar with, and conform to both UK statutory Health and Safety requirements and Company policies and procedures.
- Have knowledge of the hazards of the office as well as those directly associated with their job and practicing safe working habits.
- Use protective equipment provided for them.
- Refrain from intentionally misusing or recklessly interfering with anything that has been provided for health and safety reasons.
- Know and follow emergency procedures.
- Conform fully to instructions given by management and others with responsibility for health and safety.
- Report to their immediate manager or a first aider any injuries or illness to themselves whilst at work.
- Report to their immediate manager any incident or 'near misses' that have the potential to cause harm.

- Bring to the notice of their immediate manager or a health and safety representative any hazardous defects in plant, equipment or any item provided in the interests of safety and any shortcomings in the existing safety arrangements.
- When working on the premises of other organisations, he/she must make themselves familiar with local safety and emergency procedures and must not put themselves in danger at any time. He/she must bring to the attention of their line manager anything that gives them cause for concern.
- Attend training sessions and put such training into practice.
- Assist management in the accurate completion of risk assessments for duties within their area of responsibility.
- Notify management of any causes for concern that control measures may have become ineffective in controlling current risks.

### **Duties and responsibilities of Health and Safety Advisor (Director of Facilities) who shall:**

- Support the Management Team, Department Managers, Team Leaders and Supervisors in fulfilling their health and safety duties.
- Maintain an up-to-date source of knowledge and understanding of current and proposed UK legislation and corporate standards.
- Bring to the attention of the management team any relevant health and safety management issues.
- Liaise with the Health and Safety Executive, the Environment Agency and other relevant regulatory and professional bodies as required.
- Monitor compliance with statutory requirements and corporate standards across the office and facilitating corrective action where required.
- Collate and issue health and safety data to the Managing Partner for inclusion in Board meetings for the purposes of monitoring performance against corporate goals.
- Assist the Managing Partner in monitoring the success of the health and safety policies and recommending amendments to systems, procedures or control measures as required.
- Establish a system to ensure risk assessments are conducted in line with the policy including identifying appropriately qualified organisations to conduct risk assessments where local knowledge may not be adequate (for example, fire risk assessment).
- Assist in the investigation and resolution of any health and safety issues, accidents or incidents.
- Review and issue controlled copies of approved policies and assist in bringing these amendments to the attention of employees.
- Appoint sufficient health and safety representatives in each office.
- Set a personal example.

### **Duties and responsibilities of the Health and Safety Manager and Health and Safety Representatives who shall:**

- Assist the Health and Safety Advisor to carry out their duties at their local offices.
- Be the point of contact for local health, safety and welfare issues.
- Communicate local health and safety information.
- Set a personal example.

**Duties and responsibilities of the Health and Safety Committee who shall:**

- Take up with employers concerns about risks and dangerous events in the workplace that may affect the employees they represent.
- Take up with the employer’s general matters affecting health and safety of the employees they represent.
- Represent the employees who elected them in consultations with health and safety inspectors.
- Set a personal example.

Signed by  
**Claire Clarke**  
 Managing Partner



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