This policy applies to all companies under Churchill Contract Services Group Holdings Ltd to include the following subsidiaries and trading names:

- Churchill Contract Services (CCS)
- Churchill Contract Services Rail (CCSR)
- Amulet (Churchill Security Solutions) (AMU)
- Churchill Environmental Services (CES)
- Churchill Contract Catering t/a Radish (RAD)
- Churchill Emergency Support Ambulance Services (CESAS)
- Churchill Make Ready Ambulance Services (CMRAS)
- Chequers Cleaning Services (CQCS)
- Chequers Electrical & Building Services (CEBS)

1. PURPOSE

The Health and Safety at Work Act (HASWA) 1974 places a duty upon organisations to, so far as is reasonably practicable, ensure the health, safety and welfare of its employees and anyone else who may come into contact with the Company or its undertakings. This includes Sub-contractors carrying out work as instructed on Churchill's behalf. Although the responsibility to work safely rests principally with the Sub-contractor, Churchill recognises that it has a duty to do all that is reasonably practicable in ensuring the Sub-contractors selected possess the necessary practical and theoretical knowledge in their area of expertise, clarity regarding health and safety performance as well as ensuring that all contractual arrangements comply with Churchill's Policies, Procedures, Customer rules, and applicable Legislation.

2. SCOPE

Churchill, on occasion, uses specialist Sub-contractors to undertake a variety of different operations for and on their behalf and at their own and their customer's premises. These include additional soft services and hard service requirements. The scope of this document is to ensure the Sub-contractors selected to perform works, are sufficiently vetted so that every reasonable effort has been made regarding principles of accident and loss prevention in the management of all activities and ongoing contracts under Churchill's responsibility. As well as ensuring that our Sub-contractor line management including directors, managers, all levels of supervision, and workers take on responsibility for identifying, eliminating and/or controlling known hazards that can result in personal injury, illness, property damage, fire, any breach of security, environmental impact or any other form of controllable loss through safe systems of work.

3. DEFINITION

'Asbestos Containing Material (ACM)'	Any material containing more than one percent asbestos fibres
'Bullying, Accident, Incident & Near Miss (BAIN) Form'	The report form completed as a result of an incident taking place within a Churchill or Churchill customer premises.
'Comply'	Meet the specified standards.
'Control of Substances Hazardous to Health (COSHH)'	COSHH stands for the Control of Substances Hazardous to Health Regulations. These Regulations require employers to control exposure to hazardous substances to prevent ill health
'DBS'	Disclosure Barring Service.
'Ensure'	Make certain that (something) will occur or be the case. Make certain of obtaining or providing (something). Make sure that (a problem) does not occur.

'HASWA'	The Health & Safety at Work Act
'HAV'	Hand & Vibration.
'HSE'	Health and Safety Executive.
'Normal Working Hours'	Normal daytime operating hours between 9am – 5.30pm.
'Personal Protective Equipment (PPE)'	PPE is equipment that will protect the user against health or safety risks at work. It can include items such as safety helmets, gloves, eye protection, high-visibility clothing, safety footwear and safety harnesses. It also includes respiratory protective equipment (RPE)
'Responsible/Competent Person'	Individuals who hold relevant qualifications, experience and training in order to carry out specified tasks
SafeContractor	SafeContractor is an Accredited Health and Safety Contractor Competence Assessment Scheme
'Safe System of Work (SSoW)'	A formal procedure which results from systematic examination of a task in order to identify all the hazards. It defines safe methods to ensure that hazards are eliminated, or risks minimised
'Sub-contractors'	An individual, company or organisation engaged by Churchill to carry out works on their behalf
'Understand'	Perceive the intended meaning of. Perceive the significance, explanation, or cause of.
'Fit for Purpose'	Suitably equipped, checked and suited for its designated role or purpose

4. RESPONSIBILITIES

Directors	• To ensure this policy is suitable and applied to Churchill Group Company Operations and routinely reviewed as and when required; • Responsible for the health and safety of the company's employees and others who may be affected by the Sub-contracted works to be carried out within their respective contract portfolio; • To ensure that adequate resource is available to suitably manage the Sub-contractor approval process; • To ensure that adequate resource is available to suitably control all Sub-contractor activities as necessary;
Operational Managers	• Responsible for ensuring that this Policy and associated guidance is implemented and adhered to in their respective business units; • Ensuring that Periodic Monitoring is being carried out; • Any concerns raised by their Sub-contractors relating to the health and safety of themselves, a Churchill employee or member of public are suitably addressed;
Account Managers / Churchill Representative required to arrange Sub-contracted works.	• Advise the Sub-contractor of any client or Churchill permit to work requirements; • Have the responsibility to direct, guide and support the implementation of this Policy;

	• Ensure any Sub-contractor required to undertake any works has been approved to complete such works; • Undertake periodic monitoring; • Review safe systems of work to ensure site specific residual hazards, work scope hazards, emergency response and customer premises requirements have been captured and controlled; • Seek guidance (before subcontractor works commence) from their line manager or the QHSE department if in doubt of any of the above or where any aspect relating to Sub-contractor activities is deemed high risk;
QHSE Department	• Ensuring that Periodic Monitoring is being carried out regarding work scope and safety management systems; • Maintain robust Sub-contractor vetting process; • Have responsibility to support and guide the implementation of this Policy; • Assist in providing suitable advice on any matters relating to any Sub-contractor activities; • Suitably review high risk contracts where Sub-contractor activities form a part of operational requirements;
Sub-contractors	• Have a duty to supply a safe place of work to their employees so far is reasonably practicable. It is equally the Sub-contractor's responsibility to obtain relevant health and safety related information from Churchill in regard to residual risks, design features and Customer premises pre-requisites before entry to site can be granted. • Must ensure that the work carried out does not compromise the health, safety or welfare of themselves or others. • Ensure that sufficient Safe Systems of Work and Risk Assessments are undertaken, understood and followed by their employees; • Ensure suitable provision is made for their own first aid requirements • Ensure that their operatives are familiar with the work locations residual risks, emergency arrangements, including building design features, etc. it is the Sub-contractor's responsibility to ensure they contact the instructing Churchill representative for this information before commencing or continuing with any works; • Comply with the requirements of the relevant Churchill Policies and associated guidance; • Ensure that this policy is understood and adhered to • Ensure that all of their employees undertaking activities for or on behalf or Churchill Service Solutions are suitably trained and competent to do so.

5. IMPLEMENTATION OF THE POLICY

5.1. Further Subcontracting

To maintain control of its works and in the safety of all interested parties, it is company policy that Sub-contractors when working on behalf of or for Churchill, are not to further Sub contract their service offerings. Where there is a variation to this requirement, as such further subcontracting cannot be avoided, then approval from both the QHSE Director and the applicable Operations Director must be obtained prior to commencement of works. This is written into the Company's terms & conditions and is to be agreed to as part of the approval process. Whereby further sub-contracting work scope through a 3rd party plant provider is initiated in conjunction with a plant operator the appointing sub-contractor is expected to fulfil the required due diligence background checks to ensure that the supplier company possess a clean health and safety record, sufficient safe systems of work, the delivered plant is fit for purpose and that the operator possesses the required skills, knowledge and experience in line with UK HSE Law and industry accredited training bodies. Lastly the appointing contractor has a duty of care to ensure that the plant provider is briefed on site specific safety concerns, client safety information and all personnel are inducted where applicable.

5.2. Sub-contractor Management

It is Churchill's policy to ensure all intended Sub-contractors adhere to the Sub-contractor 'Approval Process' and it is the Sub-contractor's responsibility to stay up to date with the relevant information, instruction and training as well as gaining the recognized accreditation/s as required by law, industry standards and affiliated codes of conduct. This approval process ensures full vetting of the Sub-contractor to check and confirm their competence relating to their required tasks prior to any works being undertaken. Once approved, the Sub-contractor will join the list of 'approved' contractors who will undergo routine monitoring to ensure their level of competence is at the required level. This service is outsourced by Churchill to SafeContractor and our nominated competent external QHSE consultancy/partner.
Once placed on the Sub-contractor approved list, a Churchill representative is able to formally place an order to the Sub-contractor for their services. This will allow the Sub-contractor to be paid for the works undertaken. Churchill purchasing systems will only approve payment of Sub-contractor invoices once approval and accreditation requirements have been met and maintained.

Should QHSE not receive the information required in the contractor approval process or should SafeContractor or our nominated external QHSE resource inform the Churchill QHSE department that sufficient information has not been provided by the Sub-contractor, no operations required to be conducted by that Sub-contractor may commence.

In the event of an unapproved Sub-contractor being required in an emergency, there may be scope for a 'one off' order to be placed. In order for this to happen, approval by both the applicable Director and the QHSE Director is required. Suitable vetting of the Sub-contractor required for the 'one off' work will still be required and the information to be provided prior to any works commencing is as follows;

- A Copy of an in date Public Liability Insurance Certificate - minimum insurance cover required is £5 million; (where a Churchill client requires insurance cover above £5 million, this requirement will supersede Churchill's own requirements)
- A Copy of an in-date Employers Liability Insurance Certificate – minimum insurance cover required is £5 million;
- A Copy of an in date Professional Indemnity Insurance Certificate (where specialist advice is to be obtained) – minimum insurance cover required is £5 million;
- Copies of applicable Risk Assessments and Safe Systems of Work and where applicable, COSHH Assessments – sufficiently dated and reviewed;
- Evidence of the Sub-contractor's competencies applicable to the relevant individual employee competing the works;
- Any specific client site or task requirements.

Under no circumstances is a Sub-contractor previously approved for 'one off' order, to be used for further secondary works without the 'Contractor & Supplier Approval' procedure being followed, and the necessary documentation completed and returned to your Churchill representative.

Details of the insurance required for Subcontractors is outlined in the document 'Supplier & Subcontractor Company Information Form' provided to you for your completion. Please ensure all information requested is provided to your Churchill representative for review.

As part of the SafeContractor process, subcontractors are required to provide copies of the applicable insurance certificates. If SafeContractor consider the cover of insurance or level of insurance, insufficient for Churchill's requirement, approval of the subcontractor will not be granted.

5.3. Management of Risk

Your site-specific Risk Assessments are required to be issued to the Churchill representative arranging the required works. If it is deemed that the Risk Assessments for the proposed activities are insufficient, or evidence to suggest they lack periodic review, then approval will not be given, and the activity is not to take place. Copies of the Risk Assessments are required to be readily available for information and inspection throughout the duration of the works.

It is a mandatory requirement for all contractors to verify the adequacy of their risk assessments associated to the tasks they will be undertaking each day upon arriving to site.

Sub-contractors, where carrying out high risk activities are required to undertake a pre site visit to identify any existing hazards / local arrangements so these can be factored in to the production of their risk assessments and safe systems of works (method statements). Where prior access to site is not accessible, it is the responsibility of the contractor to dynamically risk assess the environment and workplace hazards.
In some circumstances additional Churchill and/or Client directed policies and procedures will need to be issued to Sub-contractors for their information and compliance.

Where a Sub-contractor is required to complete any works, which involve the use or production of products and bi-products that require assessment in accordance with the Control of Substances Hazardous to Health Regulations (COSHH), an adequate COSHH assessment is required to be completed prior to use or production of the substance. This must be communicated, read and understood by all those who will use or be exposed to the substance as part of their working activity.

5.4. Management of Change

Churchill require that ongoing consultation between themselves and the Sub-contractor will be maintained throughout the contract, and in particular, where a change to approved work scope methodologies and a change in risk. Churchill reserve the right to stop all subcontractor works immediately when a deviation occurs to what is reflected in the approved safe system of work.

5.5. Management Review

The Sub-contractor shall regularly review its own internal audits, evaluations, applicable regulatory requirements, HSE performance, changing circumstances, incident investigations, and corrective and preventive actions to ensure the continuing suitability, adequacy and effectiveness of their existing safety management system.

5.6. Training & Competence

Although Churchill suitably vets all of their approved Sub-contractors prior to their deployment onto Churchill or Client premises, it is the Sub-contractor's responsibility at their own expense to ensure that any of their employees' working on behalf of Churchill is suitably trained for the operations they are expected to undertake.

5.7. Suitable Staff Allocation

When working on a Churchill or Client premises, Sub-contractors are required to suitably allocate employees to specific duties. Persons aged 18 or under are not permitted to conduct any of the following operations on Churchill or Client premises;

- Driving Duties.
- Use of 'ride-on' equipment.
- Use of a forklift.
- Operation of a MEWP.
- Lone working.
- Work at Height

Churchill clients may operate their own Young Person's policies on their site. Where this is applicable their policy will work in conjunction with Churchill's own Young Persons Policy and are to be adhered to by any applicable Sub-contractor. Should the client operate additional age-related controls on site, these are to be adhered to.

As a matter of course and in line with HSE guidance, all persons under the age of 18 should have a Young Person Risk Assessment to ensure that they are not exposed to risk as a result of their lack of experience, their lack of maturity and/or being unaware of existing or potential risks.
If a significant risk cannot be removed or reduced by implementing additional control measures, then the young person must not be allowed to do the work.

The outcome of the risk assessment and the extent of control measures introduced will determine whether significant risk to the young worker remains. Where these risks do remain, young workers
MUST NOT be allowed to do this work.
It is company policy that no Sub-contractor shall bring a person on to a Churchill premises or client site that is deemed a child (under 16).

5.8. Accreditation & Qualification

Where a Sub-contractor has been requested to complete works on behalf of Churchill, they are to do so based on their experience, qualifications and accreditation requirements. Evidence must be provided as part of the approval process and be within the validity date.

*Please note, should a client request any additional requirements these will be communicated to each contractor accordingly.

Gas Operations	Sub-contractor employees working on behalf of Churchill are required to be Gas Safe Registered.
Rope Access	Sub-contractors working on behalf of Churchill are required to be IRATA members and hold the relevant IRATA rope access training levels applicable to the complexity of the works being carried out.
Electrical Operations	NICEIC Certification for the business covering applicable electrical works being carried out on behalf of Churchill.
Access Tower Erectors	Sub-contractor employees required to erect access towers in order to gain access to their required area of work are required to hold a PASMA Certificate / ID card.
Mobile Access Equipment	Sub-contractor employees using a MEWP for works being completed on behalf of Churchill, are required hold a suitable IPAF license (licensed to the equipment they are operating)
Use of Cradles	Any contractor using a cradle on a client site must ensure that they are trained to use the cradle, have a live rescue plan.
Air Conditioning Operations	Any company required to undertake Air Conditioning operational activities for or on behalf of Churchill are required to be F-Gas certified by Bureau Veritas, Quidos or Refcom
Control of Legionella	Any company required to undertake operational activities associate with the Control of Legionella in water systems such as; completing Legionella Risk Assessments, Water Treatment, Water monitoring and inspection, cleaning and disinfection for or on behalf of Churchill are required to satisfy the registration requirements of the LCA and re-register annually.
Security (ACS / SIA)	Any company required to undertake activities associate with Security operations for or on behalf of Churchill are required to satisfy the ACS accreditation requirements. All security operatives working on a Churchill client site are required to hold a valid SIA license. All frontline security employees are required to be vetted in line with BS 7858 Screening and Vetting Standards.

5.9. Drug, Alcohol and Substance Misuse

Churchill operates a robust ZERO tolerance ***Drug, Alcohol and Misuse Policy***. In order for a Sub-contractor to operate on a Churchill Managed site or office, the following must be adhered to;

- Shall not report or try to report for work when unfit* due to alcohol or drugs (whether illegal or not) or to substance abuse.
- Be in possession of alcohol or illegal drugs** within the workplace or where representing the Churchill business.
- Supply others with illegal drugs** in the workplace.
- Supply others with alcohol in the workplace, except in the course of work duties. For example, serving customers drinks at the bar.
- Consume alcohol or illegal drugs or abuse any substance whilst at work.

**Whether an employee is fit for work is a matter for the reasonable opinion of management.*

In addition, employees, workers or Sub-contractors must – ensure they are aware of the side effects of any prescription drugs;

- Advise their line manager or a member of the management team immediately of any side effects of prescription drugs, which may affect work performance or the health and safety of themselves or others. For example, drowsiness.

The full Drug, Alcohol and Substance Misuse Policy is required to be read and understood by each Sub-contractor prior to the commencement of their operational duties.

** Please note the company reserves the right to undertake random drug and alcohol testing as required.*

5.10. Modern Slavery Act

As part of the provisions under the Modern Slavery Act, Churchill requires each Sub-contractor with an annual turnover of £36 million or over, to operate a Modern Slavery Policy or adhere to Churchill's own Policy. Churchill will provide your business with their Modern Slavery Code of Conduct and relating Sub-contractor & Supplier Questionnaire for your information. Both of these documents require your company to complete and return to the QHSE department for Churchill's records. These documents and additional details will be issued via email from the QHSE department.

Failure to abide by any elements of the Churchill Policy and/or Code of Conduct requirements may result in removal from the site and blacklisted from the Churchill approved Sub-contractors list.

5.11. Social Media Use

Churchill operates a comprehensive Social Media Policy across the business which is applicable to all employees and persons or Sub-contractors working for or on behalf of Churchill. A key section of this policy outlines its fundamental requirements to each employee and Sub-contractor, these are outlined below;

- Create or transmit material that might be defamatory or incur liability for the company.
- Post messages, status updates or links to material or content that is inappropriate.
  Inappropriate content includes pornography, racial or religious slurs, gender-specific comments, information encouraging criminal skills or terrorism, or materials relating to cults, gambling and illegal drugs.
- This definition of inappropriate content or material also covers any text, images or other media that could reasonably offend someone on the basis of race, age, sex, religious or political beliefs, national origin, disability, sexual orientation, or any other characteristic protected by law.
- Use social media for any illegal or criminal activities.
- Send offensive or harassing material to others via social media.
- Broadcast unsolicited views on social, political, religious or other non-business-related matters.
- Send or post messages or material that could damage the Churchill Group's image or reputation.
- Interact with the Churchill Group's competitors in any ways that could be interpreted as being offensive, disrespectful or rude. (Communication with direct competitors should be kept to a minimum.)
- Discuss colleagues, competitors, customers or suppliers without their approval.
- Post, upload, forward or link to spam, junk email or chain emails and messages.
- Personally 'connect' or 'link' with Clients or Members of the public on client sites i.e. Students.

5.12. Conduct

Breach of any of the following may result in a Sub-contractor being removed from the Churchill Approved Sub-contractor List and prohibited from future use:

- Breach of any legislation
- Failure to follow specific instructions or specifications.
- Smoking in any buildings or grounds of the facility, other than in a designated smoking area.
- Unauthorized use of materials, tools or equipment belonging to Churchill (or its client)

- Unsafe practices or acts; violation of safety rules.
- Obscene or abusive language; racial, gender or ethnic slurs.
- Discrimination
- Deliberately damaging, defacing or misusing property belonging to Churchill (or its client).
- Removing property from the premises belonging to Churchill (or its client).
- Gambling, bookmaking or selling lotteries on the site.
- Acts of physical violence, threatening violence, harassing or intimidating any person.
- Immoral or indecent conduct; sexual harassment.
- Reporting to work when ability is impaired by the use of non-prescription drugs or intoxicants.
- Using a mobile phone or electronic device while driving a car or operating a piece of machinery.

5.13. Monitoring and Supervision

Churchill Management reserve the right to review and audit the works undertaken on site by the Sub-contractor to ensure they are being completed in line with Churchill's requirements and in a safe and professional manner. Full details of Churchill's monitoring and supervision of their Sub-contractors is embedded within their Integrated Management System (IMS) and forms part of their monitoring and auditing criteria.
It is also a requirement that all Churchill Sub-contractors will suitably monitor and supervise work activities being undertaken by their teams for Churchill. The Sub-contractor must ensure that management of change to work equipment or scope of work is supervised by a competent person to ensure the risk is managed. Evidence of this requirement is expected to be made available during Churchill's monitoring processes. Churchill reserve the right to review the selection process and approve competent supervision for their associated sites.

During any Sub-contractor inspections or monitoring of their own operations and processes, if it is identified there are any unsafe conditions, practices or equipment, action must be taken immediately (as long as it is safe to do so) to correct the issue. Any identified proven health, safety or environmental violation discovered by Churchill management regarding the Sub-contractors works, the manager is to inform the QHSE department. In line with our incident management procedures we will require a response from the Sub-contractor within 24 hours. The response must outline the steps being taken to prevent a recurrence.

6. ASSOCIATED DOCUMENTS

6.1. Security

Where a Churchill client site has specific security arrangements the Sub-contractor must ensure that these local arrangements are always adhered to. Any security factors relating to the site that are present are required to be factored in to the Sub-contractors' specific task risk assessments.

6.2. Entry to Site

The Sub-contractor's first work activity on the Customer premises/site must only be commenced subject to receiving prior approval from Churchill. In addition, all Subcontractors must undertake the prescribed safety induction of the Customers work location. When first arriving onto a site the Sub-contractor must report to the Churchill site representative or to the client when completing works out of hours. Any vehicles that you require to be brought within the site premises, must only be parked in designated areas as permitted by the client. Vehicles must never be left unattended with the engine running whist not in use. You are not permitted to park in any area of the site / premises except as required for the

purposes of carrying out your operational activities. Where you have been given permission to park within the site / premises only recognized routes of access shall be used.

6.3. Uniform and Identification

Company uniform and identification is always required to be worn / available throughout the duration of the Sub-contractor presence on the site premises. Where it has been previously agreed with the instructing Churchill representative or it forms part of the contract requirement, any requirement for a Sub-contractor to wear Churchill Uniform and/or identification is to be adhered to as necessary. This arrangement is to be made prior to arriving on site to undertake the required activity.

6.4. Permit to Work

Where a client operates a permit to work system and requires the Sub-contractor to complete a permit prior to commencement of their operations, the Sub-contractor must adhere to the client requirements as applicable. In the event that the Sub-contractor believes they should not complete a permit to work or they do not understand the permit to work system, they are to contact the instructing Churchill representative for support and raising concerns as necessary. Pre-work task due diligence should be performed by the Sub-contractor as to ascertain whether permit requirements exist at customer premises or commercial sites The Sub - contractor shall ensure its nominated personnel involved in a permit to work system are adequately trained in the permitting process and must follow the permit requirements in each case.

6.5. Segregation / Traffic Management

Where Sub-contractor operations are being conducted within areas that are still accessible or could be affected by traffic from other stakeholders or members of the public, whether pedestrian or powered, this hazard should be identified within the appropriate Sub-contractor risk assessment including the identification of suitable and sufficient segregation control measures. Such control measures as identified by risk assessment should always be adhered to. Where roadworks is required to be undertaken as part of the required Sub-contractor duties, the must be undertaken following the Department of Transport's rules & regulations Persons undertaking these works must be competent to do so. Where the sub-contractor requires clearance or road closures, they are to notify Churchill within a reasonable time frame prior to works commencing.

6.6. Use of PPE

The use of PPE, when identified as a Client, Churchill or Sub-contractor requirement or following risk assessment, must always be adhered to. Failure to abide to control measures stipulated by risk assessment such as the use of PPE may result in the Sub-contractor being removed from site and ultimately from the Churchill approved Sub-contractor's list. The Subcontractor will provide, at its own expense, all required personal protective equipment (PPE) for its employees and all required safety equipment and supplies as needed and/or assessed in the risk assessment. The Sub- contractor must ensure that they adequately manage PPE, ensuring a regime is in place for undertaking inspections and that the PPE is suitable for use. This information must be available to the Churchill upon request.

6.7. Use of Signage

Should a Sub-contractor have reason to display and remove any safety signage to warn others of the possible risk of danger etc. then they must conform to The Health and Safety (Safety Signs and Signals) Regulations and relevant European and British Standards.

6.8. Working at Height

Churchill operate a strict Work at Height Policy with supporting sub-policies to ensure sufficient controls are in place for operations that require a Sub-contractor to Work at Height. Work at height means work in any place where, if there were no precautions in place, a person could fall a distance liable to cause personal injury.

Any Sub-contractor working on behalf of Churchill who are required to Work at height are required to ensure the following are always adhered to;

- Comply with all applicable legislation;
- Working at Height is avoided wherever reasonably practicable;
- Demonstrate the hierarchy of control has been exercised
- Produce and supply a suitable and sufficient Risk Assessment.
- Any risks associated with the working at Height activity is identified, appropriate controls applied and suitably communicated to all applicable persons, in accordance with the hierarchy of the Working at Height Regulations prior to commencement of the working task;
- A Safe Systems of Work (SSOW) detailing the step by step method of how to undertake the work at height task safely, are undertaken and suitably communicated to all applicable persons prior to the commencement of the work at height task; Maintain a register of all safety equipment required by the risk assessment and ensure traceability of the equipment inspected and maintained by a competent person
- Those undertaking Working at Height activities are appropriately trained and competent to do so;
- Suitable work equipment is provided in accordance with the hierarchy of the Working at Height Regulations;
- Suitable PPE, as identified in the risk assessment, is provided to the employee undertaking the work at height task by their employer.
- Ensure users of personal fall protection equipment shall be aware of the issues surrounding suspension trauma.
- Immediately suspended works if weather conditions compromise the control measures employed or increase the risk of a fall beyond that predicted at the risk assessment stage

Churchill Sub-contractors are responsible in ensuring they;

- Comply with the requirements of the Churchill Working at Height Policies, Codes of Conduct, and associated Industry standards;
- Ensure that this policy is communicated and understood by all Sub-contractor employees required to work at height;
- Ensure that any of their employees undertaking work at height activities for or on behalf or Churchill is suitably trained and competent to do so.
- Where applicable provide a suitable and sufficient site-specific rescue plan.

6.9. Confined Space

Churchill operate a strict *Confined Space Policy & Procedure* to support their own operations, it is expected that, should there be a requirement for a Sub-contractor to undertake works within Confined Spaces, they do so in line with this Policy and Procedure.
Unless it forms part of a work instruction, at no point should a Sub-contractor's employee enter or instruct anyone else to enter a confined space.

Where there is a requirement for a Sub-contractor to enter or to undertake works within a confined space, the Sub-contractor is to ensure the following:

- The local permit to work system is followed before entry to a confined space is granted;
- Only suitably trained and competent personnel will complete or assist with the works;
- Safe Systems of Works and Risk Assessments are undertaken and communicated accordingly;
- A robust, tried and tested rescue plan is in place.
- The confined space is always manned by a century while works are underway
- Personnel can only enter the confined space wearing the required PPE reflected in the approved safe system of work
- Emergency response equipment is readily available at the confined space entry point

All persons required to enter a confined space as part of their working task must be of sufficient medical fitness to enter the area.

6.10. Plant & Equipment

It is an expectation of the Sub-contractor to ensure that all Sub-contractor owned and/or hired plant and equipment required to be used to undertake their operational task on site are suitably maintained and inspected as per the manufacturer's guidelines and legislative requirements. All necessary inspection records and documentation carried out as required by The Provision and Use of Equipment Regulations (PUWER) are always required to be in date and readily available. All plant & equipment it to only be operated by a competent person. All competent persons must ensure that no unauthorized persons operate any plant & equipment. Equipment must be maintained in a safe working condition as specified in the manufacturer's guidelines. As part of the pre-work analysis it is vital that the Sub-contractor ensures the suitability of the ground at the Customer premises/site in terms of selecting plant for the impending work scope. The equipment should be fit for purpose in terms of its design specifications, overall weight and the residual workplace hazards.

6.11. Lifting Equipment & Accessories

Lifting equipment includes any equipment used at work for lifting or lowering loads, including attachments used for anchoring, fixing or supporting it. All items of lifting equipment and lifting accessories brought onto site by a Sub-contractor or any equipment already existing at Customer premises for Sub-contractors to use to undertake their works are required to comply with the requirements for *'Lifting Operations and Lifting Equipment Regulations (LOLER)'*. Subject to utilizing existing lifting equipment or accessories at a Customer premises the Sub-contractor has a duty of care to request all thorough examination certificates from the customer relevant to the equipment or accessories being used in the work scope. All certificates should be requested within a reasonable time frame prior to works commencement date. Pre-work task due diligence should be performed by the Sub – contractor to ascertain whether lifting equipment which is designed for lifting people is appropriately and clearly marked that it is for lifting people. In addition, any carrier (e.g. a suspended personnel basket) should clearly display the maximum number of people to be carried and the safe working load.

All items must undergo statutory inspections therefore lifting equipment and lifting accessories must be inspected every six months where the lifting equipment is required to be lifting people or 12 months for non-person lifting equipment. All equipment and accessories are required to be suitably maintained and in good working order. Sub-contractors must be able to produce, on request, current certificates along with any other reports, be able to demonstrate traceability and examination schemes or equipment registers as required for inspection by Churchill or other 3rd parties. Moreover, the Sub-contractor should be able to demonstrate their process for taking equipment and accessories out of service and for quarantine. All lifting equipment and accessories should be in line with product supply directives and CE marked.

6.12. Lifting Operations

Any lifting operation which has a significant risk must have a lifting plan that meets all client, legislative and regulative requirements. This must be fully understood by all persons involved within and evidence of understanding (and competence) must be available upon request. The subcontractor is responsible for ensuring effective implementation of all control measures of the lifting plan. The Sub-contractor shall ensure that all cranes, lifting equipment and accessories supplied or used by them are certified, maintained and operated in accordance with legislative requirements. Records of inspections and test certs must be included within a method statement/lifting plan formulated by the Sub-contractor and his competent person. All lifting operations requiring a lifting plan shall be managed and supervised by qualified, competent and experienced personnel at the Customer premises/site by the Sub-contractor.

6.13. Manual Handling

The Sub-contractor shall take suitable steps to control the risks to the health and safety of its personnel from manual handling activities. This will include the preparation of manual handling risk assessments where required, and the workforce must be consulted and involved with this process to provide first-hand experience.

The Sub-contractor shall:

- Avoid the need for hazardous manual handling as far as is reasonably practicable; use handling aids or carry out the task in a different way that does not require manual handling.
- Assess the risk of injury from any hazardous manual handling that cannot be avoided; draw up risk assessments, update them as necessary and communicate them to employees.
- Reduce the risk of injury from hazardous manual handling as far as possible; provide training in handling techniques and the use of handling aids.

6.14. Compressed Gases

The Sub-contractor shall ensure that:

- Compressed gas cylinders are stored and used in accordance with legislative requirements.
- Compressed gas cylinders are always transported with valve caps or another valve protection in place. The Sub-contractor must ensure to never lift cylinders with magnets or chain or wire rope slings. Transport cylinders on specially built hand carts or trolleys or other devices designed for this. All transport devices should have some way of securing cylinders to prevent them from falling.
- The amount of compressed gases in storage is as small as possible.
- Storage areas are regularly inspected for any deficiencies such as damaged or leaking cylinders and poor housekeeping.
- All deficiencies are corrected as soon as possible.

6.15. Pressurized Systems

The sub-contractor has a duty of care to ensure that the mobile equipment brought to site is fit for purpose, maintained and used in line with applicable UK HSE legislation for pressurized systems. Where a permanent pressurized system exists, and is likely to affect Sub-contractor work scope, then this should be identified during the Sub-contractor's pre-work analysis of the Customer premises. Once identified the required isolations of hazardous energy must be implemented prior to works commencing through a permit to work system. This system will be controlled by the Customer

The Sub-contractor shall ensure that:

- Only suitably trained and competent personnel are to use pressurized systems and equipment
- sufficient risk assessments and method statements are compiled
- Implement documented pre – user inspections on pressurized equipment associated to Sub-contractor work scope
- pressurized equipment used has a robust maintenance schedule
- Select the right equipment for the task in hand
- adequate PPE is provided in line with manufactures instructions
- equipment is PAT tested where necessary
- equipment is CE marked and purchased from a recognized manufacturer
- Implement cable management techniques
- where necessary pressurized systems have undergone a competent 3rd party service
- the pressurized system has a pressure gauge
- The system has safety measures such as pressure limit alarms, cable whip harnesses, self-extracting hoses, and automatic pressure relief valves.

6.16. Hand & Vibration (HAV)

Some equipment you may be required to use to undertake your operational duties for Churchill could potentially cause damage though frequent and extensive use. The possible damage caused can be irreversible and often life changing. It is expected that all Sub-contractors identify hazards such as HAV through undertaking task risk assessments and implement sufficient control measures to avoid ill health to their employees.

6.17. Noise

The Control of Noise at Work Regulations requires employers to prevent or reduce exposure to noise at work for its employees. These regulations must always be adhered to following all required control measures.

6.18. Electricity Use

The Sub-contractor is responsible for ensuring all electrical work shall be carried out in accordance with applicable legislation and regulations. All electrical equipment brought onto Client and Churchill premises is to be used in a safe and controlled manner in accordance with current Electricity at Work Regulations and as stipulated in the task risk assessment at all times.
All portable appliances brought onto site for use must have been portable appliance tested (PAT) in line with the testing regime stipulated by suitable risk assessment. The instructing Churchill representative may request to see recorded evidence of such testing as and when required.

The excessive use of electricity is discouraged on Client and Churchill premises. Please ensure electrical equipment is switched off in between and after its required use. The Sub-contractor has a duty of care to identify in a pre-work analysis of the Customer premises or site whether hazardous energy on existing customer premises is likely to affect work progression unless isolated. The responsibility of the isolation system should rest with the Customer. Only authorized personnel who are suitably qualified will undertake work on high-voltage systems (typically 1000 volts or greater), and where appropriate. This will be controlled by a Customer.

6.19. Emergency Response Planning

The Sub-contractor is responsible for requesting all site/customer premises specific information regarding emergency response prior to compiling their own emergency response plan (ERP) or a working at height rescue plan. These plans will

be updated by the Sub-contractor subject to any change throughout the duration of the contract and any changes must be communicated to the workforce and documented. The Sub-contractor is required to cooperate with the Customer when developing the ERP and is expected to provide an interface to the ERP in its own emergency procedures. The Subcontractor shall participate in any exercise or initiative undertaken by Churchill to test, review or validate the ERP. The Sub-contractor will prepare emergency procedures for all aspects of their work.

6.20. First Aid

The Sub-contractor shall provide first aid equipment and supplies in accordance with current UK First Aid Regulations. The Sub-contractor is to carry out its own assessment of its first aid requirements, The Sub-contractor shall provide a first aid trained personnel to an adequate level that is appropriate for and in accordance with applicable industry best practice. Churchill reserve the right to review Sub-contractor first arrangements upon request.

6.21. Lone Working

The Sub-contractor shall ensure that no lone working is performed, only under special circumstances is lone work allowed and in accordance with meticulous risk assessments and safe systems of work.

6.22. Water Supply, Spillages & Drainage

Where a requirement is stipulated, a water supply will be made available on Churchill managed sites for the use of Sub-contractor operations. Sub-contractors should limit themselves to this supply and not be wasteful ensuring the water faucet is kept fully closed after use.

Should there be any deviation to the arrangements stipulated above this will be communicated prior to the commencement of works so that arrangements can be made as necessary.

Sub-contractors are to store and dispose of any COSHH substance as outlined in their safety data sheet (SDS) and in line with local disposal regulations.

Any spillages of chemicals or other such substances must be correctly managed to prevent harm to people or damage to the environment. Only use suitable waste disposal points as authorized by competent site management. Industrial and hazardous waste must be processed in accordance with the relevant regulations as defined by the Environment Agency.

6.23. Excavations and Trenching

The Sub-contractor shall ensure that excavations are managed in accordance with the applicable legislation and best working practices. A Site/Customer permit to work system must be developed and utilized to ensure all aspects of the excavations are in place before the excavation begins and the Sub-contractor should have at least one sufficiently trained person in the permit to work process.

6.24. Welfare and Emergency Arrangements

Welfare arrangements for any Sub-contractor working on behalf of Churchill will be in line with those of Churchill's own employees whilst working on the site, unless further requirement is stipulated during the work planning stage.

Churchill operate in conjunction with the client and share welfare arrangements (i.e. washing and sanitary facilities). Where such an arrangement exists, Sub-contractors are expected to maintain the facilities in a clean, tidy and safe condition.

Should any of the above arrangements not be explained fully during the induction to site, it is the Sub-contractor's responsibility to ensure that they liaise with the instructing Churchill representative to fully understand the local arrangements.

6.25. Delivery, Unloading and Hoisting Materials

The Sub-contractor is responsible for the delivery, unloading, hoisting and storage of their own materials unless previously agreed otherwise. At no time should these works impede or make dangerous, normal access and egress to areas outside the vicinity of the works.

Suitable and sufficient risk assessments and method statements are required to be produced and verified for the unloading of materials to site.

6.26. Housekeeping

Excellent levels of housekeeping should always be maintained by the Sub-contractor to ensure safe access and egress routes minimizing slip, trip and collision hazards as well as the reducing the risk from fire.

It is the Sub-contractor's responsibility to ensure that their waste or excess equipment and materials is not allowed to accumulate anywhere on Client or Churchill premises and in no circumstances is material for disposal to be stored outside the working area unless in the Sub-contractor's own authorised waste receptacle.
All surplus materials, equipment and/or waste should be cleared from the site on completion of the works. If a housekeeping issue exists that has accumulated from outside the Sub-contractor's responsibilities/work scope, then it should be reported to Churchill before works commence.

6.27. Waste

Sub-contractors are required to dispose of all wastes produced by the undertakings of their works unless previously agreed with the instructing Churchill representative. Waste must be disposed of in accordance to all applicable waste regulations and client requirements. The Sub-contractor shall ensure that all hazardous wastes generated at the Site/Customer Premises and unused hazardous chemicals are removed, transported and disposed of in accordance with applicable UK HSE legislation. The Sub-contractor shall be responsible for compliance with all requirements of all applicable hazardous waste disposal legislation for waste they generate at the Customer premises/site as a result of their work scope. A copy of the necessary documentation (i.e. Hazardous Waste Log, waste license carriers, waste transfer notes) shall be supplied to Churchill upon request.

6.28. Smoking

Smoking is not permitted in any of Churchill or our clients' premises. Sub-contractor operatives wishing to smoke must ensure they use sign posted, designated smoking areas or that smoking is conducted well away from client premises in accordance with the local policy.
Members of Sub-contractor staff refusing to abide by the local smoking policy requirements may be removed from site and prevented from further future access. Repeated offences by Sub-contractor staff members will be interpreted as poor supervisory control and could result in the removal of said Sub-contractor from the Churchill approved Sub-contractor register.

6.29. Environmental Responsibility

Churchill recognizes that is has a moral and legal duty to protect, and where possible enhance its environment though our business activities. We expect all approved Sub-contractors to operate in line with our Environmental and Energy Management Policies, which contain our key objectives for your business to contribute to and communicate to your applicable employees. The Sub-contractor is required to take steps to control the emission of dust and fumes, light and noise, Spills in quantities deemed reportable under applicable legislation must be disclosed to Churchill immediately with a follow-up incident report.

6.30. Weather Parameters

The Sub-contractor shall develop weather work guidelines that include procedures, and all stop to work shutdown rules. The weather work guidelines must fall in line with industry best practice and manufacturers recommendations for personnel lifting equipment. The Sub-contractor is expected to plan accordingly regarding work scope weather windows for working at height. This should be further reflected in their risk assessments and method statements.

6.31. Confidentiality

As a Sub-contractor working on behalf of Churchill Services you may, from time to time, witness or have access to sensitive information within our offices or client sites. All Sub-contractors are under strict instruction not to disclose any information obtained at any office or site location where you are working on behalf of or are representing Churchill. We encourage all of our clients to ensure that confidential material is either stored or destroyed in the correct manner, making sure that information at the sites where we perform our duties remains confidential.

You will also comply fully with the General Data Protection Regulations, ensuring that you adhere to the data protection principles. You must, when working with any personal information regarding Churchill clients, staff or any other persons whom you may interact with during work activities, ensure that this data is confidential and is not used for personal gain.

Under no circumstances will you approach any Churchill client and disclose or discuss any of the following;

- Contractual costs or agreements
- Any incidents you have been involved in or have witnessed.
- Personal details about your business or the Churchill business.
- Tout for business or suggest working for the client directly.
- Payment issues or concerns.
- Personal thoughts or opinions.

Subcontractors must not release any PR statements unless agreed by the Senior Churchill Management Team.

7. RELEVANT LEGISLATION

7.1. Sub-contractor Selection

During the selection of a Sub-contractor to be used to complete operations outside of Churchill's capabilities or as a result of a specific client requirement, the following aspects will be factored in to the Sub-contractor selection process:

- **Stronger safety practices:** demonstrated strengths in Health & Safety practices, identification tools and measured safety performance shall be a contributing factor in the decision-making process between Sub-contractors. This will reduce the risk involved in the activity;

- **Location:** The location of the works in relation to the required site should be a practical place of work for the Sub-contractor. This will contribute in ensuring minimal Co2 emissions and reduction of our Environmental Impacts in line with our *Environmental & Sustainability Policy*;
- **Specialism:** The Sub-contractor chosen for the required works should be on the basis that the works are with their capabilities and training competencies;
- **Cost:** Where a specific job it to be quoted for by the Sub-contractor, more than one quote is to be received prior to committing to one Sub-contractor to ensure their costs are in line with the industry standard. In making a selection of a Sub-contractor to complete works on behalf of Churchill, it is recognized that the lowest Sub-contractor quote received is not necessarily the Sub-contractor chosen to undertake the works. Other deciding factors in the Sub-contractor selection will include;

    - Health & Safety Performance
    - Positive Health and Safety Culture
    - Working relationship that may later benefit the company
    - Potential for reduced costs or rebate after a set period
    - Client preference
    - Sub-contractor Workload

7.2. <u>Incident Reporting</u>

Sub-contractors must report any accidents or incidents that take place during operations on premises where they are working on Churchill's behalf to the instructing Churchill representative (and where applicable, direct to the Churchill QHSE department). The Sub-contractor is required to complete an accident report form in line with their company processes and provide it to the Churchill QHSE department within 24 hours of the incident taking place. This reporting requirement is also applicable to bullying incidents and near miss incidents.
In the event of an Accident/Incident being a 'RIDDOR' reportable incident, it is required to be reported to the Health and Safety Executive (HSE) as required by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR). The Sub-contractor is required to notify the Churchill QHSE department at the earliest opportunity and within 24 hours of the incident taking place. The QHSE department will then proceed with an investigation as necessary.

Should Churchill be required to investigate any incident (including RIDDOR reportable incidents), the Sub-contractor must assist with the investigation to the best of their ability and where known, provide all details of the incident as accurately as possible.

During an investigation of a subcontractor incident, all scheduled works may be put on hold until re-approval is obtained following a 3rd party verification audit.
Sub-contractors must allow access to their safety management system to perform an audit against industry standards, codes of conduct and legislative requirements. Such and audit will be at the subcontractor's own cost.

For the sake of reporting procedures all potential incidents are categorised as either 'Minor' or 'Major' incidents which include, but are not limited to, the following;

QHSE Contact details are as follows. **03300 581199** or via email at HSEQ.Reporting@chucrchillservices.com.

Minor Incident	Major Incident	CRISIS Incident
Slip, trip or minor fall	RIDDOR 'Specified' Injuries	Fatality
Minor cut or injury	Fall from Height (involving work at height equipment)	Major Chemical Spill
Aggression / minor act of violence	Dangerous Occurrence	Fire
Discovery of undisturbed Asbestos	Act of violence resulting in severe injury	Loss of limb / eyesight
Minor Near Miss incident (non-life threatening)	Disturbance of Asbestos	Epidemic / Pandemic
Personal Health Issue	Major Near Miss incident	Bomb Threat / Terror Incident
Incident involving COSHH substance	Major Property Damage	Foodborne Illnesses (large scale)
Safeguarding Incident	Foodborne Illnesses (small scale)	Suicide Incident
Minor Property Damage		
Drug, Alcohol & Substance Misuse		
Loss of Services (operational)		

8. INCIDENT ESCALATION PROCEDURES

8.1. Incidents

In the event of an incident / accident, occurring affecting a member of the Sub-contractor team or member of public during the Sub-contractor works (excludes discovery of Asbestos) the Sub-contractor must;

1. Isolate the hazard and where possible, remove any potential hazards without putting yourself or others at further risk;
2. Assess and apply first aid measures as required and if the operative is trained to do so without putting yourself or others at risk (not applicable to near miss Incidents). If the incident requires, please call the emergency services and follow the steps you are advised to take by the emergency services operator.
3. Notify the onsite management team (where applicable) in line with the site emergency arrangements;
4. Notify the instructing Churchill Representative;
5. Complete your company's internal processes, notifying line management as necessary;
6. Formally report the incident by providing the Churchill QHSE department with your company's incident report form. This is to be emailed to the QHSE email Inbox at HSEQ.Reporting@churchillservices.com. This must be completed and submitted within 24 hours of the incident taking place;
7. Assist the QHSE department with any further investigation requirements.
8. Allow Churchill access to their safety management system to perform an audit against Industry standards, codes of conduct and legislative requirements. Such an audit will be at the Subcontractors own cost.

9. Ensure they have a sufficiently competent appointed resource in accident investigation techniques with whom Churchill can directly liaise with.

Should an incident take place out of hours, please notify the persons responsible for the building and advise you Churchill representative or call the Churchill Incident Line on **03300 581199**.

8.2. Communication

The Sub-contractor must be able to demonstrate effective means of communication between senior management and employees. Where work duration is continuous over the course of months the Sub-contractor would be expected to chair their own QHSE meetings to discuss HSEQ-related matters as agreed with the client, Churchill representative and QHSE department. The Contractor shall conduct daily pre-task QHSE meetings with its employees, personnel and/or supervisors as necessary, to ensure that HSE is adequately addressed in its planning and execution of work. The Sub-contractor shall provide notice of the time, place and subject of these meetings and provide the Churchill with the opportunity to observe. Churchill reserves the right to advise on corrective actions and track the progress of their implementation.

Where Churchill undertake safety meetings in relation to contracts involving a subcontractor, it is expected that, should it be required, key contractor management are made available to be present for the expected duration of the meeting.

8.3. Suspected Discovery / Disturbance of Asbestos

In the event of the Sub-contractor finding non-licensable asbestos no notification to the relevant enforcing authorities is required, however upon the identification of licensable asbestos being found this becomes reportable to the relevant enforcing authorities (HSE) the reporting of injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR). Any contact regarding external enforcement authorities must be initiated through Churchill. Any Sub-contractors that perform potentially intrusive works on Pre-2000 buildings or transport and tip residential building waste at waste facilities have a duty of care to ensure a commitment to providing Category (A) Asbestos Awareness training to its workers.

The discovery / disturbance of Asbestos Containing Materials (ACMs) requires a different reporting process. To prevent possible exposure, the following steps must be taken:

Please always ensure the following before undertaking new operational duties on site;

1. When arriving on site review the Asbestos survey and familiarize yourself and your team with any hazards identified;
2. Using the information contained within the site Asbestos survey, complete a risk assessment for the task you are undertaking;

Upon discovering / disturbing Asbestos Containing Materials (ACM's);

3. Immediately cease operations;
4. Follow your emergency response plan.
5. Notify the onsite management team (where applicable) of the suspected discovery in line with the site emergency arrangements;
6. Contact the Churchill Incident Line on **03300 581199** immediately, notifying them of the incident and providing as much detail of the event as accurately as possible.
7. Complete your company's internal processes, notifying line management as necessary;

8. Formally report the incident by providing the Churchill QHSE department with your company's incident report form. This is to be emailed to the QHSE email Inbox at HSEQ.Reporting@churchillservices.com. This must be completed and submitted within 24 hours of the incident taking place;
9. Operations are not to recommence until it has been confirmed via either the detailed study of existing Asbestos Registers or the completion of an in-depth Asbestos Survey advises that Asbestos Containing Materials (ACMs) are not present;
10. Assist the QHSE department with any further investigation requirements.

Should discovery or disturbance of Asbestos take place out of hours, please notify the persons responsible for the building and call the Churchill Incident Line on **03300 581199**.

9. CRISIS INCIDENT

9.1. CRISIS Procedures

Churchill operates a robust CRISIS management procedure and it is expected that all Sub-contractors working for or on behalf of Churchill will adhere to all of its requirements. Below are details on key persons to contact in the event of a CRISIS taking place.

Emergency points of contact during normal operating hours (9am – 5.30pm)

Point 1: Chris Williams (Group QHSE Director – **07706289875**).
Point 2: Churchill Incident Line: **03300 581199.**

Emergency points of contact out of normal operating hours

Point 3: Churchill Incident Line: **03300 581199.**

Should you contact the Churchill Control Room (details above) please ensure you advise your Churchill services representative.

In the event of a CRISIS incident taking place (CRISIS situations are detailed in section 7.2 of this policy) and you are asked by any external persons (excluding the HSE or the Police) to explain, give your thoughts or experiences regarding the incident, you are advised to gather the external persons contact details, advise them that a member of senior management will be in contact with them shortly.

Our general company PR statement we advise on using then is; **"We at Churchill have no comment at this time".** After you have given this statement, please discontinue the contact and report it to the Churchill Incident Line: **03300 581199**.

9.2. Fire

The Sub-contractor shall ensure, where necessary, that an adequate number of fire extinguishers of appropriate size and type are provided and maintained in accordance with applicable legislation. The fire extinguishers must be clearly visible and readily accessible, and the workers must be trained in the use of the fire extinguishers provided. Where the Sub-contractor needs to be use flammable products, they have a duty of care to take into consideration the fire triangle for their storage and safe handling.

In the event of a Fire taking place, upon discovery of the fire or the alarm being raised, the following steps are to be followed and should align with the Subcontractor emergency planning documentation:

1. Immediately cease Work.
2. Follow your emergency response plan
3. Notify the onsite management team (where applicable) in line with the site emergency arrangements;
4. Remain at the fire assembly point as per the site arrangements and DO NOT re-enter the building until cleared by the emergency services or if it is a false alarm, the Incident Controller has instructed that it is safe to do re-enter the building;
5. Using section 7.5.1 of this policy, follow the CRISIS procedures for details on who to contact, advising them of the incident and giving them as much details of the incidents as possible;
6. Complete your company's internal processes for a CRISIS situation, notifying line management as necessary;
7. Advise the Emergency Services/Incident Controller of any COSHH products used on site and if required contact QHSE on the Churchill Incident Line (03300 581199) for assistance in providing the details for any COSHH related products.
8. If there is a confirmed fire, formally report the incident to Churchill by calling the Churchill Incident Line on (03300 581199);
9. Assist the QHSE department with any further investigation requirements;

9.3. Bomb / Terror Threat or Incident

In the event of a threat of terror or a terrorist attack within the premises / building or within close proximity to the premises / building in which you are working, please call the emergency services on 999 (if safe to do so) and advise them of the situation, then proceed to follow the client's procedures applicable to the site's emergency arrangements.

REMEMBER: Be aware of suspicious activities and packages. Suspicious activity is any behavior or activity that could be considered inconsistent with the location. A suspicious package is one that might contain hazardous material sent with the intention of harming.

Failure to abide by any elements of the Churchill Sub-contractor Management Policy & Procedure may result in disciplinary action for negligent Churchill employees or removal from the site and removal of the Sub-contractor from the Churchill approved Sub-contractors list.

10. DECLARATION

As part of our Sub-contractor Management Policy, we issue all Sub-contractors with a link to our key policies (detailed within our initial email communication to you). This email will contain a link to a series of documents for your company to read and adhere to whilst on Churchill sites. There are also documents that are required to be returned to the QHSE department to be logged within our Sub-contractor management system. These are required to be returned to the QHSE department prior to being approved by our SafeContractor process. A Sub-contractor Declaration will be issued to you. This document will be issued to you and is required to be signed, dated and returned to the QHSE department (including any documentation stated as being required to be returned) to confirm that you have read and understood the contents of all documentation issued to you.

Not all Policies detailed within this Policy form, are issued to you on your initial contractor approval. However these policies are available upon request via the Churchill QHSE department, available on; HSEQ.Reporting@Churchillservices.com

11. ASSOCIATED DOCUMENTS

Documents to be complied with, relating to this policy include:

- CG-P-01 Drugs, Alcohol & Misuse Policy.
- CG-P-19 Group Environmental Policy.
- CG-P-20 Group Health & Safety Policy.
- CG-P-67 Work at Height Policy.
- CG-PF-41 Supplier / Subcontractor Approval Process.
- CG-F-38 BAIN Report.
- CG-F-49a Supplier / Subcontractor Company Information Form.
- CG-F-49b Churchill Terms & Conditions.
- CG-F-49e Subcontractor Contractor Declaration.
- CG-P-69 Modern Slavery Policy.
- CG-P-71 Electronic & Social Media Policy.
- CG-P-70 Young Persons Policy.

12. APPLICABLE LEGISLATION

The Sub-contractor shall be expected to internally monitor the workplace in order to ensure that health, safety, environment and welfare conditions within the areas for which they are responsible are maintained in accordance with applicable legislation. Where the subcontractor has a written HSE policy, they are responsible for identifying a list of pertinent legislative requirements.
The main legislation applicable to this Policy includes:

- Health and Safety at Work Act 1974.
- The Management of Health and Safety at Work Regulations.
- Control of Substances Hazardous to Health (COSHH) regulations.
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).
- Electricity at Work Regulations.
- Manual Handling Operations Regulations.
- Health & Safety (Safety Signs & Signals) Regulations.
- The Work at Height Regulations.
- The Confined Spaces Regulations.
- The Control of Asbestos Regulations.
- Lifting Operations and Lifting Equipment Regulations (LOLER)
- Provision of Use of Work Equipment Regulations (PUWER)
- Personal Protective Equipment at Work Regulations
- The Regulatory Reform (Fire Safety) Order.
- Health and Safety (First Aid) Regulations.
- Waste (England & Wales) Regulations.
- Environmental Protection Act.
- Modern Slavery Act.
- Corporate Criminal Offences Act.
- General Data Protection Regulations

This policy will be formally reviewed annually and updated as required.

Signed on behalf of Churchill Contract Services Group Holdings Ltd

J.M. Briggs, Group Managing Director

Date: Sept 2020