



HAWTHORN LEISURE

CORPORATE HEALTH AND SAFETY POLICY

Foreword

Hawthorn Leisure is a pub group overseeing the management of a large group of pubs as well as providing statutory compliance services to tenanted pubs.

At Hawthorn Leisure we support our pubs in attaining the highest standards of safety for everyone involved with their activities.

As the corporate lead body, Hawthorn Leisure seeks to ensure the very best is made of expertise and resources within the group and by buying in appropriate expertise to enhance safety in a manner that is commensurate and proportionate to partners' needs.

Signed:



Chief Executive Officer

Gerry Carroll

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Introduction

This corporate policy details our intentions, organisation and arrangements for ensuring the health and safety at work of employees, visitors and contractors, whilst on:

- Hawthorn Leisure premises;
- The premises of any pub under overall control by Hawthorn Leisure; or
- Any other locations where work is being conducted on behalf of Hawthorn Leisure by our employees.

Supplementary to this Policy, each pub will be responsible for developing Workplace Risk Assessments and Site Specific Health and Safety Policies and Procedures. These will be maintained and acted upon in order to control risks. Hawthorn Leisure will carry out periodic reviews to ensure that this is happening.

PART 1: Statement of Intent

It is the policy of Hawthorn Leisure to ensure, so far as reasonably practicable, the health, safety and welfare of our employees whilst they are at work, our managers and customers as well as others who may be affected by our undertakings and to comply with the Health and Safety at Work etc. Act 1974 and all other related and relevant legislation, as appropriate.

I take our responsibilities very seriously and it is incumbent on all senior managers and employees to take personal responsibility to ensure we have a safe environment for us to work in and for our customers to enjoy, so please ensure that any health and safety issues that any of you have concerns over are escalated to BDMs, Heads of departments and or Senior Managers

OBJECTIVES

To comply with the statement of policy, we will endeavour to achieve the following objectives:

- To set and maintain high standards for health and safety throughout the organisation;
- To identify risks and set in place programmes to remove or reduce those risks;
- To ensure, where reasonably practicable, that contractors working on our behalf, work to the same high standards of safety as Hawthorn Leisure ourselves;
- To ensure that all personnel are given the necessary information, instruction and training to enable them to work in a safe manner;
- To develop campaigns etc. to promote and encourage safety and health awareness of employees and others affected by their undertakings;
- To monitor our operations with regard to health and safety management;
- To ensure that the health and safety of the general public is protected, particularly related to Hawthorn Leisure's activities;
- To ensure that adequate consideration is given to the protection of the environment;
- To ensure that these standards are communicated to all employees, associated pub employees and contractors.

Signed:

Name:

Date:

PART 2: Responsibilities

All Hawthorn Leisure personnel and those who appoint others to carry out duties on behalf of Hawthorn Leisure, are required to ensure that those persons are competent and have adequate resources with regard to health and safety. They are to ensure the prevention of ill health and the avoidance of accidents. In order to promote safe and healthy workplaces, the following responsibilities have been established:

CHIEF EXECUTIVE, HAWTHORN LEISURE

The Chief Executive has established the overall Health and Safety Policy of Hawthorn Leisure. In his position, he has responsibility for ensuring that the Policy is implemented and monitored at all levels.

ALL MEMBERS OF THE SENIOR MANAGEMENT TEAM

All Hawthorn Leisure senior managers are responsible for implementing the Hawthorn Leisure Health and Safety Policy along with any other subsidiary policies and procedures within their areas of control and must ensure that risks are identified and avoided or controlled within those areas. They must ensure that adequate resources are provided and that those specifying, purchasing or hiring equipment or materials give adequate consideration to health and safety.

Adequate information related to health and safety must be obtained and passed on to relevant staff, contractors, members of the public, statutory authorities and clients.

BUSINESS DEVELOPMENT MANAGERS

All Hawthorn Leisure BDM's are responsible for:

- The practical implementation of the Health and Safety Policy and other subsidiary policies and procedures, the requirements of the Health and Safety at Work Act 1974 and other relevant legislation.
- Ensuring that operations under their control are, so far as is reasonably practicable, conducted without detriment to the health and safety of employees or others affected by their activities.
- Ensuring adherence to a safe system of work by competent employees and contractors.
- Ensuring that their area of responsibility is subject to regular inspections and adequate supervision.
- Ensuring that all accidents, incidents and dangerous occurrences, within their area of responsibility, are reported. Reviewing all such reports and ensuring that a full investigation is carried out and appropriate remedial action is taken where necessary.
- Making adequate consideration to health and safety when specifying, purchasing or hiring equipment or materials and ensuring that contractors under their control do likewise where applicable.

INDIVIDUAL RESPONSIBILITIES

All employees are required to:

- Co-operate in the implementation of the requirements of all health and safety legislation, related codes of practice and safety procedures / instructions.
- Refrain from doing anything or omitting to do anything that causes danger to themselves or others.
- Immediately bring to the attention of their Line Manager any situation or practice of which they are aware, which may lead to injury or ill health.
- Take responsibility for good housekeeping in the area within which they work.
- Report all accidents, incidents and dangerous occurrences in accordance with our guidelines.
- Follow the advice given in health and safety training in order to control workplace risks.
- Take responsibility for their own health and safety.

CONTRACTORS

All Contractors working on Hawthorn Leisure premises, or elsewhere on our behalf, are required to comply with relevant rules and regulations governing their work activities. Contractors are legally responsible for ensuring their own safety on Hawthorn Leisure premises (or elsewhere on Hawthorn Leisure's behalf), the safety of their workforce and for ensuring that their work does not endanger the safety or health of others. Contractors will be required to demonstrate their competence and adequate resources to carry out specific hazardous work, prior to their engagement via the Ostara system registration process.

COMMUNICATION

The landlords of each of our pubs is given responsibility for health and safety on the pub premises. They will ensure that any relevant information, to ensure the control of risks at that location, is communicated to all staff, contractors and customers. All Hawthorn Leisure and associated personnel should read the Site Health and Safety Arrangements Poster, wherever they work.

CONSULTATION AND TRAINING

The Chief Executive of the Hawthorn Leisure (along with our Senior Managers) is committed to involving employees at all levels in the maintenance of health and safety standards. External health and safety consultants will be used to provide professional health and safety advice, as required.

PART 3: Arrangements

Our policy and organisational responsibilities are detailed in Parts 1 and 2 of our Health and Safety Management System, above. This section, Part 3, details our arrangements for planning, implementing, monitoring, auditing and reviewing our Health and Safety Management System.

PUB HEALTH AND SAFETY POLICIES

Each of our managed pubs is to have its own safety policy, consisting of a statement of intent, clearly committing them to the introduction of safety strategies proportionate and commensurate to the risks presented to them.

To assist our pubs with writing an effective safety policy, we have developed a model safety policy. This consists of a document that can be readily adapted to build a robust policy that reflects the standards required by Hawthorn Leisure's corporate health and safety policy.

PLANNING AND IMPLEMENTATION

At Hawthorn Leisure we require mechanisms to be in place to provide assurance that our policy requirements are being introduced, maintained and effectively implemented to provide high standards of safety performance in all of our pubs.

Planning to Achieve Performance.

Each pub shall adopt a systematic and planned approach to implementing safety management systems that meet the obligations placed on them. They shall demonstrate high standards of safety performance, based upon legislation and the requirements set by Hawthorn. The steps to achieve this are generic with the degree of rigour applied being proportionate to the risk.

Risk Management.

Risk assessments are a key ingredient of a sound Health and Safety Policy. Our approach to safety risk management shall be based on principles of:

- Clear ownership of risk.
- Clear delegation of authority.
- Proportionate risk management and control measures in accordance with a recognised standard.
- Appropriate monitoring, inspection and audit.
- Common policies and standard documents.
- Transparency of risks.
- Auditable trail of decisions.

The responsibility for completing risk assessments and implementing controls falls to our pubs. Most risk assessments will be straightforward in nature, concerning workplace risk assessment – and the model assessments provided in the health and safety manual for pubs should suffice. However, there will be instances of complex risk where it will be necessary to request assistance from our contract safety advisor. The outcome of the process shall be the identification and implementation of adequate control measures to minimise harm to people.

Significant residual risks, or where adequate control cannot be achieved, shall be reported up the management chain for action at the appropriate level – the first step being the relevant BDM. (Note; it may be necessary to stop the process until a satisfactory solution is implemented).

The degree of rigour applied by duty holders to the management of safety risks shall be proportionate to the magnitude and complexity of the individual situation. Five steps shall be applied by duty holders to ensure effective management:

- **Risk Identification** – There must be a clear description of what the activity leading to the risk is and the threat it poses to the objectives and outputs.
- **Risk Assessment** – Identified risks shall be assessed in terms of likelihood of them occurring and the consequences should they occur. Consideration shall include the potential people affected. This shall be translated into an indication of the relative importance of the risk to enable consistent comparison and prioritisation.
- **Risk Management** – For effective management of the risk, an owner, with the authority to determine the degree of mitigation they wish to apply to ensure the tolerability of the risk, shall be identified.
- **Risk Reporting** – The risks identified; details of the owner and control measures in place shall be compiled by completing the assessment documents in the health and safety manual. Risks requiring further mitigation shall be included in a risk reduction program.
- **Risk Review** – Mitigation measures must remain effective; if they become degraded the likelihood of the risk coming to fruition will increase. To prevent this, managers shall assure themselves periodically that mitigation measures remain proportionate and effective.

OBJECTIVES AND TARGETS

Setting of objectives and targets is an integral part of all management systems. Consequently, our plan contains strategic objectives, including those for safety, together with targets for their implementation. They are directed at all our pubs, in respect of preventing fatalities and injuries, and with regard to delivering safe equipment and safe systems of work.

Safety objectives for continuous improvement are aimed at our pubs and shall be cascade down the line management chain. In addition to the suite of safety related objectives and targets placed upon them, BDMs shall additionally set objectives and targets to improve safety performance. The extent of this shall be driven by a review of safety performance and identified safety risks at each pub.

ACTION PLANS AND TASKS

The achievement of objectives and targets shall be a key indicator of safety performance.

Managers shall demonstrate that they adopt a planned approach to their achievement. This shall typically be in the form of a safety action plan which includes:

- Measures to be taken to achieve objectives and targets set by their BDM.
- Actions to manage risks identified in the risk assessments.
- Actions to rectify deficiencies identified via an inspection.

MEASURING PERFORMANCE

It is essential that effective mechanisms exist to feedback performance information for review in the continuous improvement cycle. Effective feedback to BDMs is to be encouraged to ensure that safety policies, standards, arrangements and regulations remain effective and that opportunities for improvement are identified and taken.

AUDITS

Audit is an essential part of our safety management system. A useful definition of audit in this context is “the structured process of collecting independent information on the efficiency, effectiveness and reliability of the safety management system and drawing up plans for corrective action”. It, therefore involves making judgments about the adequacy of performance. Audits shall aim at establishing that:

- Appropriate management arrangements are in place and effective.
- Adequate risk control systems exist, are implemented, and consistent with the hazard profile of each pub.
- Appropriate precautions are in place and effective.

Audits of each managed pub will be conducted independently by engaging a contractor.

REVIEW

Reviewing is the process of making judgements about the adequacy of performance and taking decisions about the nature of the actions necessary to remedy deficiencies and maintain continuous improvement.

Review of performance against targets, objectives and performance indicators must consider how well Hawthorn Leisure is achieving the performance levels that it has set itself at all levels.

Review shall also consider progress in management of corporate safety risks. The feedback of information on successes and failures shall be a continuous process, including identification of remedial actions, shortfalls in policies, standards, arrangements, etc. and for revision of objectives and targets.

GENERAL ARRANGEMENTS

Hawthorn Leisure managed pubs are to ensure that they have arrangements in place to cover First Aid, Fire and Emergencies, Accident Reporting, Health and Safety Monitoring and Liaison with the Enforcing Authorities. The names of those appointed with key health and safety responsibilities are to be clearly displayed on all Hawthorn Leisure premises.

PERFORMANCE STANDARDS

We expect our managed pubs to achieve the following standards:

1.0 Health and Safety Policy

Each pub is expected to have an effective health and safety policy, consisting of three parts, statement of intent, organisational section and arrangements to assist compliance with these performance standards and any other significant hazard they become aware of.

The safety policy will be reviewed and signed by each pub's landlord at least every 12 months.

The statement of intent is to be clearly displayed on a notice board located where employees frequently gather. The location of the safety policy is to be known to all staff.

2.0 Occupier's Liability Insurance

Our managed pubs are to prominently display their current insurance certificate in an area where staff and customers have access. No out of date insurance policies are to be displayed.

3.0 Health and Safety Law Poster

The health and safety law poster is to be clearly displayed where employees frequently gather.

The relevant details shall be filled in.

4.0 Local Health and Safety Assistance

The name and contact details of the local BDM are to be made known to all staff for the purposes of raising safety issues.

5.0 Health and Safety Communication

Health and safety is to appear as an agenda item for meetings where minutes are taken.

6.0 Health and Safety Competence

All new employees are to be given health and safety induction training by their BDM.

Relevant health and safety competencies are to be written into job/role descriptions for landlords.

Refresher health and safety training will be provided to all staff

7.0 Health and Safety Consultation

Each pub is to be able to demonstrate it has fulfilled its legal duty to consult with workers on matters of health and safety.

8.0 Worker Involvement

Our pubs are to actively encourage worker involvement in health and safety. When receiving suggestions, always ensure that the person making the suggestion receives feedback, even if the answer is "sorry and these are the reasons why".

9.0 Working at Height

Each of our pubs must identify all working at height activities undertaken by staff or contractors.

The pub must undertake a suitable and sufficient risk assessment of working at height activities (based upon the model assessment provided in the health and safety manual).

10.0 Noise

For our pubs that host live music, they are to create a local policy that informs employees of the hazards from exposure to excessive noise and explains the control measures required to minimise the risks.

11.0 Violence to Staff

Our managed pubs are to ensure they have controls in place and inform all our staff on how to minimise risk from assault. The model risk assessment provided in the safety manual will help with this process.

12.1 Security of Persons and Premises

Our pubs are to ensure, so far as is reasonably practicable, that there are suitable and sufficient arrangements for the topics listed below...

- a. Exterior lighting.
- b. Burglar Alarm (externally monitored).

- c. Use of toughened glass and safety glazing.
- d. Identification of visitors.
- e. Control of access to non-customer areas.
- f. Installation and use of CCTV, neighbourhood watch schemes etc.

13.0 Hazardous Substances - Control of Substances Hazardous to Health (COSHH)

Each pub is to undertake a chemical hazard risk assessment using the model document provided in the safety manual will help with this process.

14.0 Personal Protective Equipment (PPE)

Each pub must understand that the use of PPE as a risk control measure is a last resort as it protects only the user and is at risk of not being worn correctly.

15.0 Manual Handling

Each pub is to undertake a manual handling risk assessment using the model document provided in the safety manual will help with this process. The purpose of this is to provide advice and guidance to all line managers and employees in order to minimise the risk from manual handling activities in the workplace.

16.0 Mechanical and Electrical (fixed and portable)

Each pub is to take appropriate measures to make sure that all electrical equipment is safe and suitable for the purpose intended. Although Hawthorn Leisure will provide appropriate competent contractors to inspect, manage and maintain electrical systems, it is important that...

- All relevant persons are made aware of the hazards associated with electricity.
- Users of electrical equipment have in place working procedures designed to keep the risks to their health, and to the health of any other person, as low as reasonably achievable.
- Any other local people engaged to carry out the testing and/or repair of electrical equipment must have the appropriate technical knowledge, training and information to enable them to work safely.
- Results of electrical safety tests (PAT testing and fixed wiring inspections) are recorded and held on Ostara.
- The interval for testing of fixed wiring and distribution boards will not exceed more than 5 years and may be more frequent if determined by a competent person and/or our insurer. Records are held on Ostara.

17.0 Maintenance of Machinery and Equipment (such as cellar lifts)

Each pub is to ensure that all work equipment is highlighted to their BDM and must ensure that relevant equipment is included on the asset register so that it can be managed by Hawthorn Leisure via the Ostara system.

18.0 Asbestos

Our pubs must commit to maintaining our premises free from asbestos where they currently do not contain any. Pubs that do have asbestos containing materials on site must:

- Make sure that they have access to the asbestos survey (which will be on Ostara).
- Implement a robust asbestos management plan using the documentation in the safety manual.
- Check the condition of asbestos containing materials and report any deterioration to their BDM.
- Tell members of staff about these arrangements.

19.0 Service Contractors

Service contractors have regular access to our sites as specified by central contracts.

All contractors are to be informed and consulted over emergency arrangements. A copy of the Fire Emergency Evacuation Plan is to be provided to them and the asbestos management plan and survey (if relevant).

20.0 Slips and Trips

Each pub is to undertake a slip and trips risk assessment using the model document provided in the safety manual.

The pub should also identify who the responsible person is for ensuring regular inspection of communal areas to remove all hazards, obstructions and spillages. All staff must be vigilant and report promptly possible slip and trip hazards where they cannot make safe the hazard.

21.1 Cleaning

Each pub is to have in place a detailed cleaning schedule. All waste is to be disposed of according to appropriate health and safety guidelines. Where necessary; deep cleaning is to be undertaken on a regular basis. Pubs must ensure:

- Good standards of general cleanliness
- Appropriate waste disposal
- Safe stacking and storage.

22.0 Snow and Ice Gritting

Each pub is to ensure there are adequate arrangements in place to minimise the risks from snow and ice on the site e.g. access/egress routes.

23.1 Fire Safety and Emergency Evacuation

Each pub must have its own fire risk assessment, conducted by a competent person, along with:

- A Fire Emergency Evacuation Plan
- Individual Personal Emergency Evacuation Plans for person with disabilities that could hinder their safe escape in the event of a fire.

Fire risk assessments for each pub can be downloaded from the Ostara system. Where a pub fire risk assessment cannot be located, the landlord must inform the BDM immediately and a new assessment must be commissioned as soon as is possible.

24.0 First Aid

For our pubs there is no strict legal responsibility to have a trained first aider at the premises. However, Hawthorn Leisure's position is that the presence of a qualified first aider is appropriate given the risks from various areas of the business; therefore, whenever possible at least one full time employee should be trained as an emergency first aider. When a first aider is not on shift, our pubs must have an Appointed Person on shift. All businesses must have an Appointed Person.

25.0 New and Expectant Mother

Each pub should make clear that it is responsibility of the pregnant lady to inform management in writing, so that an appropriate risk assessment of their work routines can be carried out. Upon being notified, Hawthorn's safety advisors will provide a risk assessment pro forma and advice leaflets for the landlord and the pregnant lady.