

Health & Safety Management – Framework Document

Background

Health, Safety and Environmental management is an essential area of business compliance that enables Crown Estate Scotland¹ to operate in a sustainable manner and meet legal obligations.

Requirements

As a land and property business it is essential that all business activities, investments and assets are safely worked, developed and enjoyed to deliver the best value over the long term. It is requirement that Crown Estate Scotland and employees comply with the requirements of the Health and Safety at work Act etc., 1974 and all other relevant statutory provisions. This involves (so far as is reasonably practicable):

- Development of arrangements to prevent, injury, ill-health and damage as a consequence of our undertakings
- Provide a safe and healthy working environment
- Provide and maintain plant, machinery and systems of work that are safe and without risk to health
- Ensure assessments of risks to people are undertaken and control measures implemented to manage these risks
- Provide information, instruction, training and supervision as is necessary to ensure H&S of our employees
- Allocate sufficient resources to enable H&S policies to be effectively implemented
- Consult and maintain good relations with employees, trade union representatives, the HSE, Local Authorities and relevant public agencies
- Make the management of H&S issues an integral part of our daily activities and actions

In order to meet these requirements, a new management framework needs to be put in place for Crown Estate Scotland which addresses the following areas:

- Health, Safety & Environmental (HSE) Policy for Scotland
- H&S Risk Register for Scotland
- HSE Strategy / HSE Culture
- HSE Policies and Procedures for Scotland
- Business planning
- HSE Competent Advice
- HSE in Procurement
- Operational Management
- Procedures for Direct Management of estate based staff (Fochabers, Glenlivet)
- Procedures for Indirect Management through Managing Agents.
- Permitted activities

¹ Crown Estate Scotland is the trading name of Crown Estate Scotland (Interim Management)

- Property compliance
- Forestry management
- Tree safety management
- Staff Training requirements
- Accreditations and memberships
- HSE Audit procedures
- Consultation with Employees /Health and Safety Committee Meetings – leadership, agenda, frequency and attendees
- HSE Reporting
- Incident management
- Emergency procedures, crisis management, security

A framework for each of these requirements are set out below:

Health, Safety & Environmental (HSE) Policy for Scotland

A Health and Safety and Environmental policy statement needs to be agreed and signed off by the Head of Property /Chief Executive of the new business and reviewed on an annual basis. This is a short statement setting out the commitment to H&S and environment and describing the policies in place to address key requirements. A draft health and safety policy statement is included in Appendix 1.

Risk Register for Scotland

There is a requirement to identify all the significant H&S risk to the business and to review this on an annual basis. This is owned by the Head of Property and communicated to staff. Inadequate management of H&S presents a significant financial and reputational risk to Crown Estate Scotland. The key risks relate to:

- Employee safety / Occupational Health
- Plant, vehicles and machinery used by employees
- Construction projects (managed by CES(IM) through staff or agents)
- Forest management/tree safety management
- Property safety: State of tenanted residential properties/farm buildings (electrical/gas/asbestos)
- Visitor / public safety (countryside facilities/walking and mountain bike trails/ footbridges, other public liabilities etc.).
- Mines and quarries
- Energy and Infrastructure
- Void management
- Procurement

The risk register should include an analysis of the key hazards and safety liabilities for which the Crown Estate Scotland has responsibility for managing and the policies and procedures and mitigating actions in place to reduce these risks to an acceptable/reasonable level.

This risk register will be drafted and consulted with key stakeholders in the business to ensure it is reflective of the broad range of assets within the business.

The risk register should be reviewed at least annually and during quarterly corporate H&S review meetings.

The risk register should also comply with Scottish Government requirements where required.

For environmental risk management, an impact and aspects register must be in place and regularly reviewed. This will form part of the HSE management system.

HSE Strategy / HSE Culture and Leadership

Promoting a high-performance culture towards H&S should be a priority. This requires a clear strategy and vision statement, developed with and communicated to all staff and managing agents, together with regular reinforcement of key messages, regular training, constant review of activities and appropriate follow up to key issues and incidents, along with reward processes in place to provide positive feedback for good practice. Developing this culture within each business areas should be the responsibility of all staff and, in particular, management staff. Business culture should also be subject to review through periodic surveys and feedback from customers, stakeholders and staff.

Crown Estate Scotland will provide leadership through prioritisation of health and safety at a senior levels and integration of health and safety into business planning. A reporting structure will be set up to ensure that health and safety performance can be reviewed by the Board. Crown Estate Scotland will ensure the importance of health and safety and our expectations as a client are fed through its supply chain through methods such as periodic managing agents forums.

The Board of directors in an organisation have a special role to play when it comes to ensuring health and safety is managed effectively and health and safety legislation has strengthened in recent years to increase the accountability of Directors if health and safety is not managed or resourced. Even though a board director for health and safety may be appointed and their role is to ensure health and safety is considered and integrated into business planning it is the entire board who have legal accountability.

'Under the Corporate Manslaughter and Corporate Homicide Act 2007 an offence will be committed where failings by an organisation's senior management are a substantial element in any gross breach of the duty of care owed to the organisation's employees or members of the public, which results in death. The maximum penalty is an unlimited fine and the court can additionally make a publicity order requiring the organisation to publish details of its conviction and fine.' (HSE guidance: <http://www.hse.gov.uk/leadership/faqs.htm>)

The new sentencing guidelines have also increased the penalties a company will face in the event of health and safety mismanagement if someone may have been injured. No harm needs to have occurred for there to be a prosecution.

To ensure Crown Estate Scotland has an excellent level of leadership in health and safety, the Institute of Directors guidance (leading health and safety at work, actions for directors, board members, business owners and organisations of all sizes) will be followed.

H&S leadership needs to ensure adequate provision is made throughout the business to answer the following questions identified within the guidance:

- How do you demonstrate the board's commitment to health and safety?
- What have you done to ensure your organisation, at all levels including the board, receives competent health and safety advice?
- How are you ensuring all staff – including the board – are sufficiently trained and competent in their health and safety responsibilities?

- How confident are you that your workforce, particularly safety representatives, are consulted properly on health and safety matters, and that their concerns are reaching the appropriate level including, as necessary, the board?
- What systems are in place to ensure your organisation's risks are assessed, and that sensible control measures are established and maintained?
- How well do you know what is happening on the ground, and what audits or assessments are undertaken to inform you about what your organisation and contractors do?
- What information does the board receive regularly about health and safety, e.g. performance data and reports on injuries and work-related ill health?
- Do you compare your performance with others in your sector or beyond? Where changes in working arrangements have significant implications for health and safety, how are these brought to the attention of the board?
- What do you do to ensure appropriate board-level review of health and safety?

This framework provides a basis for ensuring these questions are answered but ultimately it is a responsibility of the business leadership team to implement and monitor these requirements.

HSE Procedures for Scotland

The following policies and procedures have been migrated from The Crown Estate to ensure Crown Estate Scotland complies with management requirements as soon as it starts to operate as a separate entity. These require review during the first year of operation to ensure they are in-line with ongoing requirements identified in the risk register (above). As there is little change in business operations / asset base on the date of transfer, the existing policies and procedures meet legal requirements for the new body and cover the requisite management system obligations.

The new architecture has defined 12 core policy areas which include:

HSP01: Health and Safety Policy

HSP02: Management of common risks

HSP03: Fire, emergency and incident response

HSP04: Environmental Management

HSP05: Electrical and Gas Safety

HSP06: Asbestos Management

HSP07: Asset Management

HSP08: Plant, Equipment and Heavy Operations

HSP09: Audit, Inspection and Review

HSP10: Occupational Health and Wellbeing

HSP11: Work at Height

HSP12: Construction and Project Safety

Business planning

It is essential that H&S management is a key aspect of business planning and should be included as a target/output in all respective business plans and the Corporate Plan. Outputs and targets should also be integrated into the performance management system so individual staff have ownership of these outputs and management expectations.

All regular management meetings should include H&S as the first agenda item. This signals the importance of H&S as a management priority and supports a 'safety first' culture.

Business planning and management should include a process to ensure that the results of audits and monitoring processes and any recommendations resulting from these are built into business planning and budgets. Minutes of central H&S meetings for the previous year should be reviewed prior to the annual business plan review.

HSE Competent Advice

Crown Estate Scotland must have HSE competent advisers in place and the business has now appointed external consultants. This provision can be reviewed in time. The current Head of Property has completed The Institution of Occupational Safety and Health (IOSH) H&S Leadership course and additional training is being provided for the Glenlivet Business Assistant, who will be taking on a co-ordination role for H&S in CES(IM).

An alert service also needs to be put in place to ensure changes in legislation are communicated to relevant staff / managing agents and incorporated into working practices / policies and procedures.

HSE in Procurement

In managing its business Crown Estate Scotland has responsibility for ensuring that those engaged on its behalf and within its business supply chain adhere to relevant H&S requirements. It is important to ensure that the organisations we use have the right skills knowledge experience and attitude to perform effectively and at a high standard.

It is a priority to set clear expectations for H&S when awarding contracts, and when working with suppliers. Effective monitoring and evaluation procedures should be put in place to ensure compliance, assess skills and experience and provide for effective feedback and response to feedback.

As a large part of business management is undertaken by managing agents, processes are needed to monitor managing agent compliance through regular reporting, incident management procedures and property compliance (see also monitoring and reporting below), in accordance with the terms of managing agent appointments.

Managing Agent Appointments

These terms are set out in Appendix A for Savills and Bidwells. Terms differ slightly between firms to reflect the different asset management responsibilities.

Operational Management

Directly managed activities

These are activities where Crown Estate Scotland has sole control of an activity, establishing requirements for that activity and delivering those requirements using employees (e.g. Forest management, Glenlivet estate visitor services).

For direct management activities, Policies and Procedures should be in place to identify the risk to staff (risk assessments (RAs)) for the activities they undertake. A training plan and records system also needs to be in place. Crown Estate Scotland needs to ensure that personnel are appropriately qualified to undertake relevant tasks, have appropriate levels of training, have relevant supervision in place and that all plant and equipment used is fit for purpose and is inspected regularly.

Fochabers and Glenlivet Maintenance Workforce

As employers of the maintenance team based at Fochabers Crown Estate Scotland has responsibility (as with all employees) to ensure procedures are in place to identify the work risks (risk assessments) for the activities undertaken and to put in place control measures to reduce these risks as low as reasonable practicable. It is also a responsibility to provide adequate training and advice, provide adequate supervision, personal protective equipment (PPE) and appropriate tools and equipment for staff to be able to undertake their duties safely. Provision of an appropriate workplace and procedures for monitoring, inspecting and recording H&S data are also essential.

As managers of the day-to-day tasks undertaken by the workforce, and budget holders for their equipment, Savills (under their terms of Appointment) have a large degree of control and therefore responsibility for ensuring that the workforce remain compliant with all internal safety, health and environmental requirements, to a greater degree than they would when instructing contractors to work on behalf of Crown Estate Scotland. This involves ensuring that appropriate RAs and method statements are in place for the tasks instructed, that the team are competent to carry out the assigned task, that there is safe access, safe equipment, that they are provided with information on the health and safety risks associated with the task, that adequate supervision is in place, that the workforce comply (through regular inspections) with all H&S controls (identified in RAs) and that H&S is regularly reviewed as part of day-to-day management.

Occupational Health and Wellbeing

Crown Estate Scotland is required to assess all employees job requirements against their job role to identify occupational health (OH) risks. Certain roles will require routine medicals to be undertaken to monitor potential long term impacts and any underlying or other health issues that may be adversely affected by the job requirements. This may then require management intervention/controls to be put in place to mitigate against the impacts of long term exposure or reasonable adjustments to mitigate against exposure to these risks. Occupational Health requirements need to be managed through an OH provider and current options are being investigated.

Staff of Crown Estate Scotland also have a responsibility for their personal health and need to make their employer aware of any health issues that might be adversely affected by their job role (e.g. pregnancy).

Line managers have a responsibility to work with Human Resources (HR) to manage specific staff health issues and to put in place and monitor relevant risk assessments.

It should be a general procurement policy to contract out/hire tasks which carry specific risks (i.e. those not normally undertaken or managed through standard procedures / RAs) to mitigate against OH risks.

Staff Wellbeing

There is a growing body of evidence to show the financial benefits enjoyed by organisations that implement well-being programmes, including reduced sickness absence, improved productivity and reduced staff turnover. Consideration should be given to a workplace charter for 'wellness' and the development of a 'wellness' program.

Activities can be planned and managed through workplace committees to ensure continued engagement and applicability to the business.

For most staff in Crown Estate Scotland driving on business represents the highest H&S risk and this will be reviewed within risk assessments to ensure this risk is managed appropriately.

A procedure for the pool car is required to ensure that any employee using the car is covered by insurance and evidence of driving licenses have been provided. Employees will be required to inform Crown Estate Scotland if they are banned from driving or receive points on their licence. They will also be required to complete safety checks on the vehicle before use and report any concerns or faults. The car log book (mileage and record sheets) should be completed for all journeys.

Workplace assessments

HR will be required to ensure that all new employees are provided with information on display screen equipment risks and safe use. They will also provide a DSE assessment (paper assessment) to be completed by all staff. Any follow up concerns that cannot be rectified will need to be resolved by line managers or with HR organising specialist support where required. Crown Estate Scotland will have the services of an occupational health provider (as per above) to call upon in this instance.

Indirectly managed activities

Where a work activity is delivered and managed by a third-party organisation on behalf of Crown Estate Scotland, and Crown Estate Scotland does not take day to day responsibility for management decision, but maintains a strategic overview and has a client responsibility.

This is where we have relationships with Managing Agents / external project managers or contractors managing assets on our behalf.

Permitted activities

Activities which occur on Crown Estate Scotland owned land but are not under the control of Crown Estate Scotland for example offshore activity where we lease seabed to developers.

Although there is no legal requirement for us to carry out H&S checks on third party organisations, leasing parts of the seabed or an asset does have potential reputational risks. For this reason, we follow a due diligence process and ask a set of H&S questions during the approval process. We then require organisations to disclose any incident reportable to HSE or any other significant H&S matters.

This procedure is defined within our HSE management system.

Property compliance – indirect management

As a property and landlord legal responsibility for H&S compliance includes:

- Asbestos
- Electrical safety

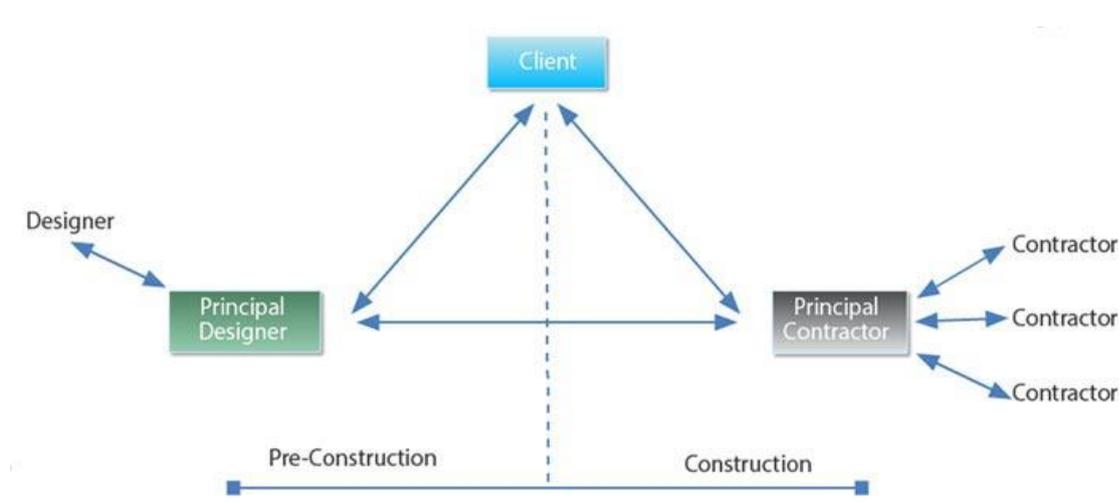
- Gas installations
- Structural soundness/stability
- Domestic Water supply quality

These duties are carried out by our managing agents and require monitoring through monthly and quarterly reporting processes to ensure compliance. This will be assured through external auditing provided by the external consultant. Crown Estate Scotland will need to investigate and put in place arrangements for monitoring and managing MA compliance and record keeping using an appropriate electronic or other compliance management system.

Crown Estate Scotland needs a policy for asset management which covers client requirements. This will be provided to all managing agents and they will be expected to adhere to this as a contract condition.

The Construction (Design and Management) Regulations 2015 (CDM) - coordination

Crown Estate Scotland will act as a client under the CDM 2015 where any construction work as defined by the regulations is carried out. Even where external project managers or managing agents project manage the work, the ultimate client responsibility will often remain with Crown Estate Scotland. Key client responsibilities are covered within the Crown Estate Scotland CDM procedures and staff are required to complete CDM awareness training. The diagram below demonstrates the client position in relation to the other duty holders:



Crown Estate Scotland carries out construction work directly with the Fochabers team, in this capacity the team are required to carry out the additional requirements of CDM 2015 and have CDM awareness training to ensure they comply with the requirements.

Property compliance – direct management

The Health and Safety Coordinator will be responsible for office compliance in premises occupied by Crown Estate Scotland staff at Tomintoul (Glenlivet), Applegirth Forestry Office and Bells Brae (as a tenant) with responsibilities including:

- Fire risk assessment
- Fire alarm checks and maintenance
- Provision /maintenance of fire extinguishers
- First aid / fire wardens - notices
- Water hygiene management (legionella)

- Asbestos
- General maintenance / trip hazards / fire exits
- Signage
- Emergency procedures
- Identification of responsible person
- H&S law poster
- Display of H&S committee minutes / agenda

Forestry Management

All commercial forest areas across the Crown Estate Scotland are managed in-hand by the Forest Manager for Scotland based at the Applegirth Estate office. Forest management activities including felling, ground preparation, planting and general maintenance are the responsibility of the Forest Manager. Given the nature of forest management, H&S requirements are set out in a separate policy which – identifies specific requirements for silvicultural management. It is a requirement that this policy document is reviewed annually and is updated in line with best practice / legal requirements.

Woodland management is audited annually against the UK Woodland Assurance Standard which involves an assessment of forestry H&S.

Tree safety management

The management of trees to protect against the liability of hazards caused by dangerous or diseased trees is a key element of risk management in Scotland. A well-developed procedure is in place to manage this risk and is set out in a separate policy document. As with forestry safety, it is a requirement to review/audit this policy annually to ensure it meets best practice.

Staff training requirements

CES(IM) has an obligation to ensure staff training needs have been identified, staff have attended the relevant course and skills are kept up to date.

A training matrix is required that identifies training requirements against job role and refresher training. Records that training has been undertaken are required to be kept with HR.

Appointment of a Health and Training Coordinator within the business is required to ensure that all the requirements to maintain the systems described within this framework document are undertaken. A job description for this role will need to be developed.

Certification and memberships

SIA Global have provided 18001 and 14001 certifications historically to The Crown Estate. It is expected that Crown Estate Scotland will be maintaining this certification moving forward. Once established Crown Estate Scotland will need to apply for membership of SIA Global.

Membership of British Safety Council and RoSPA will also be considered moving forward. The internal H&S Coordinator will be required to sign up to IOSH.

HSE Audit procedures

Crown Estate Scotland must ensure that the health and procedures are implemented and effective. Auditing will ensure that internally and externally application of procedures is carried out. The Crown Estate Scotland H&S consultant will be required to provide a service to audit Managing Agents and contractors where required. Managing agents will be audited annually as a minimum.

Crown Estate Scotland will be independently audited by SIA through the 18001 and 14001 certification process which will identify gaps in application or effectiveness of health and safety management and provide advice on best practice, based on knowledge of other clients and organisations approach to H&S management.

Consultation with Employees / Health and Safety Committee Meetings – leadership, agenda, frequency and attendees

Each area of the business will need to nominate a health and safety representative who will sit on the central H&S committee. It is their duty to consult with and provide information to other staff within their business areas. The legal requirement to consult with employees will be achieved through periodic H&S consultation meetings and circulation of minutes of the central H&S committee. The involvement of managing agents on the Central Committee should be considered as and when appropriate.

The following items will be included within the terms of reference for the Health and Safety committee:

- Definition of responsibilities for H&S representatives
- H&S Performance review – to include
 - MA compliance – indirectly managed property and accident data including project and CDM. Including property compliance for direct and indirectly managed properties and permitted activities.
- Updates on legislation
- Accident / Incidents review / enforcement visits
- Culture – promoting a strong H&S culture
- Reviewing responsibilities for H&S
- Updates for RA / Risk register required.
- Maintaining dashboard
- Training requirements
- H&S reps feedback from business area

HSE Reporting

The health and safety co-ordinator will produce a report to go to Bells Brae H&S committee every quarter. This will ensure H&S performance is reviewed by a cross section of representatives from each portfolio and estate as relevant.

Head of Property will chair this and develop a report for the Board on a bi annual and annual basis.

Health and safety should feature as a standing agenda item in management meetings (as per above).

Managing agents will be required to report on health and safety within their existing reporting format. The degree of health and safety information will be proportionate to the amount of health and safety responsibility held by the managing agent. A draft Dashboard has been produced to be reviewed and finalised.

Incident management

All incidents, accidents and near misses need to be recorded to ensure that lessons are learnt and remedial action is taken to prevent a reoccurrence. Near misses are defined as incidents where no harm or damage occurred but harm or damage could have occurred.

Directly managed

All offices will be required to hold an accident book to ensure any accident involving a member of staff or a member of the public is captured and the correct information collated. Line Managers or the responsible person for that estate or property (key contact within Crown Estate Scotland) will have responsibility for investigating where necessary.

Notification of all accident, incidents and near misses must be promoted throughout the business for directly managed and indirectly managed portfolios.

Managing agents and contractors are required within their contracts to comply with our incident notification requirements including reporting any accidents, incidents and near misses to their key contact (i.e. asset manager) within the business. They will also be required to carry out investigations where necessary and provide incident reports to their key contact Crown Estate Scotland.

There will be one person within Crown Estate Scotland who is given responsible for collation of accident statistics to provide reporting to senior management within Crown Estate Scotland and enable trend analysis to take place.

Emergency procedures, crisis management, security

All potential emergency scenarios need to be considered and mitigation measures put in place by the person in control of the event, asset or estate. This could include a security threat, fire or loss of building functions. For directly managed activity emergencies are assessed within the risk assessment process to ensure the team have emergency procedures where required for work activities or organised events. For properties under the direct management of Crown Estate Scotland a fire risk assessment, trained fire wardens and emergency procedures will be in place.

For indirectly managed activities contractors and managing agents will assess the potential emergency scenarios and have mitigation measures in place.

A crisis management plan is required in case of a loss of ability to function normally such as a building failure or IS failure to ensure the business can continue to operate. This H&S framework should be cross referenced with Crown Estate Scotland Crisis Management policy as required.

Health and Safety Policy

Crown Estate Scotland (Interim Management) is a body corporate constituted by The Crown Estate Scotland (Interim Management) Order 2017 and having its principal place of business at 6 Bells Brae, Edinburgh, EH4 3BJ, acting in exercise of the powers conferred on it by the Scotland Act 1998 (as amended) and The Crown Estate Act 1961 on behalf of Her Majesty the Queen.

We manage, develop and care for a variety of assets across Scotland including four rural estates, mineral and salmon fishing rights, about half of the coastal foreshore and almost all the seabed out to 12 miles.

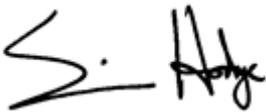
Through working with others, we aim to innovate with land and property to create prosperity for Scotland and its communities. All our revenue profit goes to Scottish Government. Our 2017-20 [corporate plan](#) and 2018-19 business plan details our priorities and objectives, and our [Framework Document](#) sets out our functions, duties and powers.

We seek to not only comply with health and safety legislation but find opportunities to continually improve and we recognise that excellent health and safety management is fundamental to the success of an organisation. As an organisation and employees, we will:

- Openly listen to suggestions to improve health and safety
- Provide strong and active leadership in health and safety
- Ensure adequate arrangements are in place to identify health and safety risks to the organisation and risks are managed appropriately.
- Develop arrangements to prevent, so far as reasonably practicable, injury, ill health and damage as a result of its undertaking.
- Provide clear instruction, information, training and supervision to ensure employees have the right skills, knowledge and experience to do their work.
- Engage and consult with employees and our supply chain to request their involvement with health and safety culture and conditions.
- Allocate sufficient resources for health and safety to be managed effectively.
- Assess and plan for potential emergency scenarios.
- Maintain safe and health working conditions, provide and maintain safe plant equipment and machinery and ensure safe use and storage of substances.

Our Health and Safety Framework sets out how we will achieve this. We will review this policy and this framework annually to capture changes in legislation and new ideas from within our organisation and our supply chain. All employees are expected to understand and apply the requirements of this policy and work to embed a positive health and safety culture.

Signed:



Simon Hodge

Chief Executive

Dated: 20 December 2018

Appendix 2

Schedule to Managing Agent's Contracts

Schedule Part 8 – Health & Safety

- 1.1 You are responsible for managing and making sure we meet, as property owners, our health and safety obligations. In particular, you must:
- (a) maintain all relevant records including statutory records;
 - (b) fully co-operate with our head of Health and Safety or any health and safety adviser we instruct.
 - (c) as soon as possible, tell us about any new health and safety law or other law which affects our health and safety obligations whether or not it may lead to a requirement to carry out work to any of our properties.
 - (d) make sure that all contractors and suppliers you appoint to do work to our properties have the relevant skills, resources and have effective health, safety and environmental management systems. You must review these systems regularly, make sure that the contractors implement all necessary controls when carrying out work at any of our properties, and keep records of any such reviews for future inspection.
 - (e) make sure that all assessments of risks created by any of our properties are carried out and formally reviewed at least once every 12 months, and make any necessary changes on-site within agreed timescales.
 - (f) make sure that if there is an accident, incident or environmental incident, a suitable investigation is carried out and the findings are communicated to us as soon as possible. You must tell us straight away if there is a serious or major incident, including any enforcement action by a regulatory body.
 - (g) inform us of any intended work to the property (including service-charge work) that is notifiable to the Health & Safety Executive under the Construction (Design and Management) Regulations 2015 (“CDM 2015”). Where you appoint contractors to carry out construction work as defined by CDM 2015 at our properties, you will be the ‘client’ and fully discharge all duties of the ‘client’ as detailed in CDM 2015. You must identify and formally appoint competent duty holders including as necessary Principal Designers and Principal Contractors and provide assurance that those duty holders meet the standard outlined in CDM 2015. You must make sure we are fully aware of the extent of the proposed work and have sufficient understanding of the arrangements in place to control it, including a pre-start inspection of the site and documented confirmation that all “Client Duties” have been fully discharged.
- 1.2 Where you manage building projects, you must carry out initial checks before any construction work begins on non-notifiable projects including, as stated in Guidance L153:
- (a) checking that there is adequate protection for our workers or members of the public or both;
 - (b) checking that the contractor has provided adequate welfare facilities;

- (c) checking that there is good co-operation and communication between designers and contractors;
 - (d) getting confirmation from the contractor that the arrangements they agreed to make have been implemented.
- 1.3 Where you are responsible for the instruction/co-ordination/management of any directly employed Crown Estate personnel, you must ensure that:
- (a) they remain compliant with all internal safety, health and environmental requirements;
 - (b) appropriate risk assessments and method statements are in place for the tasks instructed;
 - (c) they are competent to carry out the assigned task;
 - (d) there is safe access and safe equipment;
 - (e) they are provided with information on the health and safety risks associated with the task;
 - (f) adequate supervision is in place;
 - (g) they comply (through regular inspections) with all health and safety controls (identified in risk assessments); and
 - (h) health and safety is regularly reviewed as part of day to day management.
- 1.4 We aim to attain compliance and future accreditation to voluntary Health and Safety Standards. You must work closely with our Head of Health and Safety and all appointed specialist advisers, and agree to implement practices and controls to assist in this process.
- 1.5 Where we issue Crown Estate health and safety policies from time to time, you must comply with these.
- 1.6 We will agree health and safety performance targets with you each year as part of the business planning process.
- 1.7 You may be subject to a health and safety due diligence audit at least once every 12 months.