



**Crown Estate
Scotland**
Oighreachd a' Chrùin Alba

Management of Common Risks

Health and Safety Policy

HSP02



Management of Common Risks

Contents

Document Control.....	3
1. Purpose.....	4
2. Scope	4
3. Policy.....	4
3.1. Policy Statement	4
3.2. Policy Objectives	4
3.3. Policy Overview	4
4. Definitions.....	4
5. Policy Requirements.....	5
5.1. Risk Assessment	5
5.2. Method Statements	5
5.3. Office Safety	6
5.4. Fire safety in the workplace	6
5.5. Display Screen Equipment and Workstation Safety	7
5.6. Occasional Remote Working.....	7
5.7. Lone Working	8
5.8. Consultation with Employees within CES.....	8
5.9. New and Expectant Mothers	9
5.10. Working with young people or vulnerable adults.....	9
5.11. Supplier Selection	9
5.12. Permit to Work	10
5.13. Personal Protective Equipment.....	10
5.14. Manual Handling	10
5.15. Occupational Road Risk	10
5.16. Mobile Phones in cars.....	11
5.17. Carriage of Petrol and Diesel Fuels.....	11
5.18. Slips & Trips	12
5.19. Work at Height.....	12
5.20. Stepladders	13
6. Deviations from Policy.....	13

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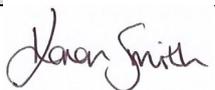
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1. Purpose

This document supports Crown Estate Scotland's Health and Safety Policy Framework HSP01 by providing direction and principles for the management of common and health and safety risks. This document outlines broad requirements for the management of risks that are not captured within other specific policies. Subject specific policies have been developed to cover areas which both present a significant risk to the business and are governed by specific legislation.

2. Scope

This policy applies to all sites where Crown Estate Scotland (CES) holds responsibility for health and safety management, all vehicles used for CES business, to all activities undertaken by CES employees or contractors working on behalf of CES and to visitors to CES offices and depots

3. Policy

3.1. Policy Statement

Crown Estate Scotland is committed to ensuring risks relating to our work are identified, assessed, and adequately controlled. Where risks are common across the business, Crown Estate Scotland will develop policy and procedures to ensure we adopt a consistent approach to management of risk and implementation of control measures. Where activities are managed by contractors, Managing Agents, or other external parties then they are responsible for management of risk and implementation of control measures.

3.2. Policy Objectives

To ensure an effective and structured management system that ensures significant risks are identified, assessed and suitably managed.

3.3. Policy Overview

Duty Holders are responsible for ensuring that risks relating to our work are identified, assessed, and adequately controlled. Individual requirements in this policy outline the approach to be adopted in several subject areas common across the business.

4. Definitions

Employee	Any person employed directly either in a short term or permanent basis to work within Crown Estate Scotland.
Line Manager	Any person with responsibility for managing people (including section heads and line managers).
Facility Manager	Any person with responsibility for health and safety in a particular CES office or depot.

Managing Agents and Supply Chain	Any individual or organisations engaged to supply goods or services to Crown Estate Scotland under a contractual agreement.
Duty Holder	Any Line Manager, Asset Manager, Facility Manager, Managing Agent or Contractor with responsibilities under health and safety law. Both internal and external parties may have duties under law so it is important that, where there is potential doubt, responsibilities are agreed and clearly defined in writing.
Personal Protective Equipment (PPE)	Clothing or equipment designed to protect the individual user or groups of users against health or safety risks at work. The Equipment should be suitable and sufficient to the work activity.

5. Policy Requirements

Crown Estate Scotland and its Managing Agents and Supply Chain will ensure that:

5.1. Risk Assessment

Risks associated with activities under its control are assessed and such controls as are deemed necessary are implemented to reduce risk to an acceptable level. Duty Holders are responsible for ensuring risk assessments are undertaken for all activities and/or premises that they manage.

Duty Holders are responsible for:

- identifying potentially hazardous activities within their area of responsibility;
- ensuring risks are assessed and controls are identified which reduce risk to an acceptable level;
- ensuring controls are implemented;
- communicating the findings to staff; and
- ensuring risk assessment methodologies are reviewed and undertaken at least annually to reflect any changes in the way a task is undertaken; and
- ensuring that risk assessments undertaken are properly recorded and subject to effective resumption procedures.

Copies of risk assessments may be held centrally or locally but must be agreed and signed by those undertaking the work to which they relate. Principal risk assessments are reviewed annually in conjunction with compliance or if there are any major changes in the way in which the workforce are carrying out a task. Site specific risk assessments are completed when workforce arrive on site to carry out tasks, this is completed in the form a risk assessor app and refers back to the relevant principal risk assessment.

5.2. Method Statements

High risk or more complex tasks may warrant development of a 'safe system of work' where risk assessment alone does not reduce risk to an acceptable level, or where a specific methodology, set of controls, or sequence of work must be followed.

Method statements should be produced where they will assist in:

- identifying controls at each stage of the task
- communicating information about the controls and work sequence to those carrying out the work

Duty Holders are responsible for identifying circumstances where use of method statements is an appropriate control, reviewing related risk assessments, and identifying both existing and additional control measures. Reference should be made to CES, HSE and industry guidance and the knowledge of others including employees or contractors who have practical experience in completing the task.

Method statements should identify the sequence of work and highlight other specific points that must be considered e.g. permit to work requirements, task or site-specific environmental factors. Content should be communicated to employees prior to commencement of work. Method statements should be reviewed once tasks have been completed to identify and take into account lessons learned.

5.3. Office Safety

Duty Holders are responsible for identifying and assessing risks associated with activities undertaken by employees. Facilities and Office Managers are responsible for identifying hazards and assessing risks posed by the building or premises and completing Location Risk Assessments.

Whilst work in office environments generally presents a relatively low risk of injury, risk assessments must be completed for new starts and undertaken annually to ensure risks remain properly controlled. Specific risk assessments are required for using the offices during Covid restrictions, and will be reviewed regularly in line with Scottish Government guidelines. Specific risk assessments are also required for activities associated with moving office premises. All office-related risk assessments will be reviewed for any new premises.

The content of and any changes to assessments must be agreed and signed by those undertaking the work to which they relate.

5.4. Fire safety in the workplace

Crown Estate Scotland recognises its responsibilities for fire safety in the workplace.

At Bells Brae this is as occupier of part of a building, which means we will work with the landlord or their agents, and other occupiers to meet our responsibilities. At Glenlivet and Fochabers this is as owner and occupier of the building. At Glenlivet, our responsibilities include visitors to the seasonal visitor centre.

As a responsible party Crown Estate Scotland will ensure the Duty Holder:

- Carries out a fire risk assessment of the premises and review it annually (in the case of Bells Brae, securing a fire risk assessment from the owner, and risk assessing aspects that we are responsible for as occupier).
- Tells staff about the risks we have identified

- Ensure that appropriate fire safety measures are in place and maintained.
- Plans for an emergency.
- Provides staff information, fire safety instruction and training.

Fire risk assessments process will:

- Identify the fire hazards.
- Identify people at risk.
- Evaluate, remove or reduce the risks.
- Record findings prepare an emergency plan and provide training.
- Review and update the fire risk assessment regularly.

This will involve consideration of:

- emergency routes and exits
- fire detection and warning systems
- firefighting equipment
- the removal or safe storage of dangerous substances
- an emergency fire evacuation plan
- the needs of vulnerable people, for example the elderly, young children or those with disabilities
- providing information to employees and other people on the premises
- staff fire safety training

5.5. Display Screen Equipment and Workstation Safety

Crown Estate Scotland recognises the risk to staff presented by use of Display Screen Equipment (DSE) including musculoskeletal disorders, visual fatigue, and stress. While the risks to individual users are often low, they can still be significant if good practice is not followed. Crown Estate Scotland recognises the need to control and reduce all such risks to employee health, including during periods of home working.

Duty Holders are responsible for identifying display screen equipment users and are required to ensure training and workstation assessments are undertaken for all relevant employees. The Cascade HR system should be used to schedule and record training.

5.6. Remote Working

Duty Holders are responsible for managing risks to staff who undertake work at locations which are remote from their normal place of work. Such locations may include work from home or at third party premises.

Risks associated with working remote from office or home base must be assessed. Duty Holders must review the assessment with the employee, assess the risks, and implement appropriate controls. Employees are responsible for alerting duty holders to any follow up actions. Where reasonably practicable controls cannot be implemented it may be necessary to restrict or prohibit work at the remote location.

Of the work equipment used at home, the employer is only responsible for the equipment it supplies.

5.7. Lone Working

Duty Holders who require or allow staff to work alone are responsible for conducting a risk assessment of the work and for setting strict parameters of what can and cannot be undertaken while working alone. Employees who could be considered to be lone workers include those working in isolation from other employees and those who spend significant amounts of time working in isolated or remote locations.

Although lone workers are not subject to direct supervision it is still the responsibility of their line manager to ensure their health & safety at work so far as is reasonably practicable. This means that employers must conduct risk assessments of all the work activities carried out by employees, including those working from home.

Whilst most homeworkers will be doing low risk, desk-based jobs, the Duty Holder will ensure appropriate risk assessments are conducted both at the start of the homeworking arrangement and periodically thereafter. The Duty Holder will consider issues such as stress levels in the home environment, how to ensure rest breaks and other working time obligations will be met, whether specialist equipment is required or needs to be safety tested, first aid arrangements, and reporting work-related accidents. Of the work equipment used at home, the employer is responsible only for the equipment supplied to the job holder.

Duty Holders must ensure they regularly monitor the control measures that have been implemented for lone workers to confirm they are still effective and suitable. The effectiveness of controls and arrangements should be reviewed every 12 months or in light of any reported incident, concern, or change in working practice. Any changes should be reflected in the risk assessment and must be communicated to affected employees.

Lone working also extends to staff who may be working alone in offices (including CES offices) outside normal working hours or during holiday periods or weekends. Appropriate risk assessments and control measures should be put in place and communicated to all staff.

Additional lone working safeguards are in place for estate staff based on the use of SPOT lone working devices.

5.8. Consultation with Employees within CES

We recognise and support the need to consult and communicate with the workforce on matters which affect their health and safety. Duty Holders should be able to demonstrate that they have effectively engaged with the workforce on matters relating to health and safety. This includes identifying health and safety aspects through the annual scorecard and appraisal cycle.

5.9. New and Expectant Mothers

Duty Holders will ensure that the risks to new and expectant mothers from work related activities are identified, eliminated or reduced to as low as reasonably practicable. New and Expectant mothers are defined as any employee who is pregnant, has given birth within the last six months or who is breastfeeding.

Employees must inform their Line Manager and HR of the pregnancy as soon as possible. Once informed, the Line Manager and Employee must review the tasks and processes that the employee is exposed to identify risks to both the mother and unborn child.

The Line Manager must ensure a formal risk assessment is carried out and they must discuss findings and proposed controls with the Employee. Control measures must be reviewed to ensure that they remain effective and must be reviewed in their third trimester.

5.10. Working with young people or vulnerable adults

Duty Holders are responsible for giving particular consideration to the health and safety of children and vulnerable adults and recognise their inexperience, lack of hazard awareness and potential immaturity. Young people are defined as anyone under the age of 18 years old.

Young people may be engaged to carry out work through employment, voluntary work, work experience or similar scheme. In all cases the duty holder is responsible for undertaking a specific risk assessment covering their proposed work and must consider:

- Restrictions on use of hazardous equipment and substances
- Assessment of physical capabilities and any restrictions
- Hours of work, rest periods, etc.

The risk assessment shall be discussed with those responsible for supervising work.

The Duty Holder will ensure that the appropriate Disclosure and Criminal Records checks are undertaken in relation to staff working with young people or vulnerable adults.

5.11. Supplier Selection

Where a contractor or supplier is appointed, the appointing manager is responsible for taking reasonable steps to ensure they have the required level of competence to discharge their duties. This means ensuring they have the required skills, knowledge, understanding, qualifications, professional accreditation and resources to complete the delegated responsibilities without causing injury, damage to property or equipment, or damage to our reputation.

Contractors or suppliers must have appropriate Public Liability Insurance and provide evidence to the appointing manager that they have a current cover at the time of the work being carried out.

5.12. Permit to Work

Management and control of complex and or high-risk tasks should be controlled by a suitable permit to work system. This demonstrates that an agreed safe system of work has been applied to the control of a specific task. This system is currently in place for all excavation work, mechanical or manual.

Duty Holders are responsible for identifying tasks requiring control under a permit to work, applying the agreed procedure, and nominating competent individuals with responsibility for the issue of permits.

5.13. Personal Protective Equipment

Personal protective equipment (PPE) is designed to protect the user against health or safety risks at work that cannot be eliminated or effectively controlled by other measures such as engineered controls and safe systems of work.

Duty Holders are responsible for:

- Considering the hazards involved in the task and assessing risks.
- Selecting suitable PPE based on its suitability and its ability to meet current standards.
- Ensuring people are trained in correct use of PPE.
- Ensuring PPE is adequately maintained.
- Ensuring appropriate storage is available.
- Recording the issue of PPE to staff and taking all reasonable steps to ensure it is worn.

Staff are responsible for using PPE and undertaking user maintenance in accordance with the instructions they have been given.

5.14. Manual Handling

Planning work activities in such a way to reduce risk of injury to staff in the activities of lifting, moving and handling of items and equipment. Hierarchy of control to be considered at the beginning of all operations is;

- Avoid hazardous manual handling operations
- Assess any operations that cannot be avoided
- Reduce the risk of injury so far as reasonably practicable.
- If unavoidable complete a risk assessment.
- Ensure sufficient training is provided to all staff that may undertake manual handling activities.

5.15. Occupational Road Risk

Duty Holders must ensure that all necessary measures are taken to ensure the health and safety of those who drive as part of their job. This applies to anyone driving on company business and includes use of both company and private vehicles. Staff using private vehicles for work purposes must ensure their insurance covers their vehicle for business use.

Duty Holders must ensure staff can demonstrate the necessary level of competency to drive the vehicle in question. All staff required to drive vehicles on the public highway must hold valid insurance, current driving license, any other tax and certificates covering the vehicle in question. Evidence of competency and relevant documentation must be supplied to Crown Estate Scotland as required.

Duty Holders are responsible for ensuring that vehicles and other mobile plant owned, provided, or operated is maintained and inspected in accordance with the manufacturer's recommendations and any statutory requirements.

Duty Holders are responsible for ensuring all driving activities are assessed for risk. Risk assessments must be made agreed and signed by drivers along with provision of company guidance on driving at work.

Winter driving for work purposes can be particularly hazardous particularly at Glenlivet and Fochabers. Staff driving at work in the winter, in remote locations must ensure appropriate risk assessments are prepared taking into account forecast weather conditions and the nature of their journey and ensure vehicles are equipped with appropriate equipment and are suitable for the road conditions.

If riding a bike for work, the rider must wear high visibility jacket or sash if riding on the road and a properly fitting safety helmet at all times.

5.16. Mobile Phones in cars

The policy of CES on the use of mobile phones in vehicles is:

- The driver of the vehicle should not make or receive calls or in any other way hold or interact with a hand-held mobile phone unless the car is stationary.
- Stationary means parked up safely, not waiting simply at traffic lights.
- If the phone rings and the vehicle is moving, let the answering service pick up the call. Find a safe and convenient place to stop and respond accordingly.
- Hands free sets should only be used if no hand action is required, and then only to receive calls. If a call is received, pull over in a safe place to have the call or agree to call back when stationary.
- Drivers of vehicles should not undertake any other operation with a hand-held device such as reading or writing texts, emails, choosing music or social media or use a dictaphone unless safely parked.

If using a bicycle for work purposes, the above policy applies.

5.17. Carriage of Petrol and Diesel Fuels

Storage and movement of fuel by road are subject to stringent and specific legislative controls given the risk to employees, premises, third parties, and the environment.

Duty Holders are responsible for planning such movements and implementing controls which minimise this risk by:

- Minimising the movement and storage of fuel.
- Ensuring plans for movement fuel are developed by competent persons with appropriate knowledge.
- Ensuring that no more than 333 litres is moved in a CES vehicle.
- Ensuring containers and storage arrangements are suitable and meet relevant standards.
- Ensuring staff involved with transportation of fuel receive appropriate training and have the appropriate PPE.
- Developing and implementing appropriate controls and emergency procedures.

5.18. Slips & Trips

Nationally, slips and trips account for around 40% of all major reportable accidents and all Duty Holders have a responsibility to reduce the likelihood of a trip occurring.

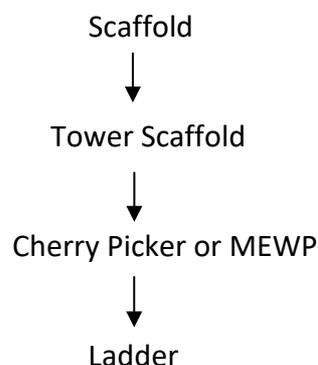
- Staircases, corridors and doors of entry and exit must not be used for storage.
- Hold onto bannisters when walking up or down the stairs
- All floors, passages, steps must be kept clean and free of mud and tripping hazards.
- Desks must be arranged to minimise trailing cables
- Floors around desks must be kept clear of files, boxes or other paraphernalia
- Any temporarily laid cables must not cause a tripping hazard.
- Any spillage of fluid must be contained and cleared away immediately – if you SEE IT, SORT IT
- Facility Managers must ensure that icy paths are properly treated.

5.19. Work at Height

Falls from height account for the greatest number of fatal and major accidents across most industries; whenever work at height is to be contemplated, the means of access and type of working platform must be considered.

Crown Estate Scotland staff are not authorized to use ladders. In specifying tasks for others the need to work at height should be eliminated as far as possible; where possible carrying out the work from ground level.

When this is not possible the hierarchy of options are as follows:



Under no circumstances may the bucket or pallet forks of a loader be used to gain access

to high places.

Ladders must always be the last option and used only where the use of more suitable work equipment is not justified because of the low risk, short duration of use, or existing features on site that cannot be altered.

Where the risk of falls cannot be eliminated, they must be reduced through collective fall arrest systems such as harnesses and airbags where possible or by using personal fall protections such as harnesses and lanyards.

Upstairs windows on buildings managed by CES, must be cleaned using long-reach equipment that is designed so that no ladder work is required.

5.20. Stepladders

Under no circumstances must a stool or chair or other piece of furniture be used to reach high places. A step ladder is used by the Glenlivet team for occasional tasks as well as a loft ladder for access to roof-space. A three-step stepladder is provided at Bells Brae to reach high storage.

Stepladders are not designed for any degree of side loading and are relatively easily overturned. Avoid overreaching, ensure your belt buckle (navel) stays within the stiles and keep both feet on the same rung or step throughout the task. At least one other person must be present when work with stepladders is required. Any damage found must be reported and the stepladder discarded.

Chairs, desks or other surfaces are not to be used as an alternative.

6. Deviations from Policy

If this policy cannot be complied with or there is a more effective way of working the justification for this must be submitted to the Health and Safety Committee for consideration and agreed in writing by the line manager before any work is carried out.

Any deviation from policy without approval will be investigated under CES performance or disciplinary procedures as appropriate.