



Equity

Health & Safety Policy 2017



One Jubilee Street, Brighton, East Sussex, BN1 1GE



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1. Policy Authorisation

This document is authorised by Equity's Managing Director David Campbell.
This document is administrated by the Equity Health & Safety Advisor.

Policy Issue Control

This document has immediate effect and supersedes all previous versions of the Health & Safety Policy.

Policy Review

In conjunction with the Managing Director and Head of Operations, the Equity H&S Advisor will undertake a holistic review of the Policy on an annual basis. If no change to the Policy document are necessary, it has validity for two years from the date of authorisation. (Please see article 5 for full details).


Date: January 2017
David Campbell
Equity Managing Director



2. Statement of Intent

Equity is committed to compliance with statutory health, safety and welfare obligations primarily outlined in the HSWA - Health & Safety at Work Act 1974, the Workplace (Health, Safety & Welfare) Regulations 1992, the MHSR - Management of Health and Safety Regulations 1999 and any other relevant protective legislation.

It is our intention to achieve high standards of workplace health and safety and to ensure, so far as is reasonably practicable, the safety, health, environment and welfare of all employees, visitors, contractors and others who may be affected by the Company's operations, in particular the special responsibility on us to ensure that our child clients are protected from harm. Equity endeavor to work alongside NSPCC to have appropriate training, policies and procedures in place to prevent, manage and report on any such instances in so far as our responsibilities lie, specifically (but not exclusively) the Equity Safeguarding Policy.

In addition, maintaining full assured membership within the STF - School Travel Forum by compliance with their Code of Practice and maintaining our LOtC - Learning Outside the Classroom Quality Badge accreditation by compliance with their health and safety award criteria.

In the unfortunate event of a Major or Crisis incident negatively concerning or affecting the delivery of our product to a major degree, we are equally committed to resolving a crisis situation and provide support through the implementation of our Crisis Management Procedures set out in our Major Incident (Crisis) Management Plan 2016 and 'Grab Guide' respectively.

We recognise that the effective management of health and safety in the workplace is a shared employer and employee responsibility. To this end, we encourage a proactive health & safety culture by involvement in safety management from all employees. Equity will provide the necessary training, guidance and support to enable employees at all levels in the organisation to be effective stakeholders in their own safety and other people's safety in the workplace and provide the necessary communication channels to enable this contribution to take place.



The aims of Equity:

- Effectively identify, assess and control risks and prevent harm primarily to our staff, guests or visitors and secondly to property, animals and the environment.
- Ensure a planned and systematic approach to the management of health, safety and welfare arrangements when engaging with Contractors, Suppliers and third party premises. Ensuring it is understood, agreed and achieved.
- Ensure that Equity maintain high standards of food safety within all our catering kitchens, equipment, and ensure procedures meet the required legal standards to provide healthy and safe food to our guests and staff. Establish and apply industry best practice wherever reasonably practical to do.
- Set a clear Company direction in respect of health, safety and welfare arrangement (by way of this Policy), to be supported and adhered to by all levels of staff within the company, but primarily driven by clear senior management commitment to the Policy and Procedures and general health, safety and welfare principles.
- To this effect, promote a positive health and safety culture within Equity and protect the assets, earnings and reputation of Equity.

To achieve the above aims, Equity will:

- Have a Safety Management System based on the risk control principles outlined in the Health and Safety Executive revised HSG65 document, Health and Safety Management System that can be simply summarised as: Plan – Do – Check – Act (or the PDCA cycle in line with POPIMAR).
- Prepare and implement procedures and arrangements to deal with health and safety concerns, near misses, accidents, illness, injuries and emergency situations.
- Safeguard children by ensuring that all Equity staff, Reps and UK Operators are DBS or List 99 checked, competently trained to meet the required standards (NSPCC) to safely supervise young people. *See the Equity Safeguarding Policy for further details.*
- Adequately assess work related risk factors faced by employees and by people not in our employment, but whom may be affected by our Company's operations and that employees and other persons are sufficiently informed



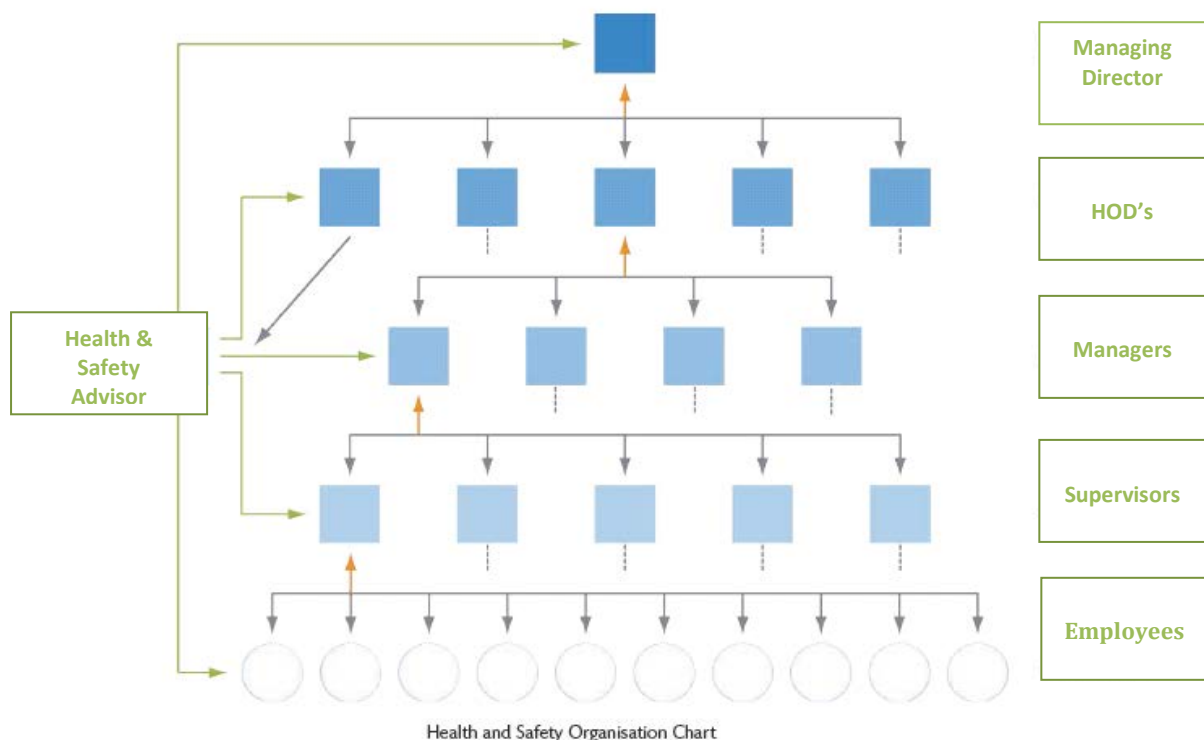
about the risks and the protective and preventative measures that exist to control these risks for the benefit of their health, safety and welfare.

- Inform employees of their legal health and safety responsibilities owed to their employer and peers, consult with them regarding any significant changes to the health, safety and welfare arrangements of their workplace where relevant to them.
- Ensure employees receive suitable and sufficient training so that they have the necessary knowledge, competence and skills to fulfil their duties without risk to their health and safety. Employ technically competent person(s) to assist the Company in meeting the requirements of Health and Safety legislation.
- Provide accurate documentation to support the delivery of our operations and make this easily accessible to those who need it.

Accidents and ill health at work reported under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations)

<http://www.hse.gov.uk/riddor>

3. The Organisation of H&S within Equity





4. Equity Organisational Roles & Responsibilities

Managing Director

The MD is ultimately responsible and accountable for the entire organisation.

Heads of Department, Managers, Supervisors & Team Leaders

Are responsible for ensuring that all appropriate safety measures are in place and being carried out effectively within their sphere of managing control.

H&S Advisor

A specialist health and safety practitioner whom is responsible for providing advice and support management for / to employees in achieving safety.

Employees

All employees are responsible for acting safely and responsibly at all times in the course of their duties at work. Equity promote a positive and proactive H&S culture. Ensuring a shared duty of care.

Technically Competent Person(s)

Competent persons have operational duties but are considered competent to carry out one or more specialist health and safety duties, e.g. first aiders and fire marshals.

5. Monitor, Audit & Review

We will use the outcomes from significant incidents, site inspections, internal and external checks, inspections and audits and feedback from guests and staff to monitor the effectiveness of our Health and Safety arrangements and where necessary / appropriate, the Health and Safety Advisor will review and improve any applicable Risk Assessment.

Where significant amendments are identified as necessary, to improve either this Policy or the Procedures that support it, these will be implemented on an ad-hoc basis following consultation with the relevant employees and ensure all employees are informed of the changes.

Otherwise, this Policy will be reviewed on an annual basis.



Safety Management System Procedures (SMS)



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6. Safety Management System Arrangements

6.01 Accident & Incident Reporting, Investigation & Recording

Equity has case specific Incident Reporting, Classification, Investigation and Recording procedures in place for all our UK and Overseas operations. Accident Books are present in all Equity premises' and the location is conveyed to staff by way of the New Employee H&S Induction. Brighton office Accident Records are reviewed by the Health and Safety Advisor and Head of Human Resources. Accident Records are removed from seasonally operating premises (Ski) at the end of the season and provided to the Head of Human Resources for keeping for the statutory period of time required. Equity also makes use of the online incident report form accessible through the main website. Paper copy incident reports are also completed and sent through accordingly in line with our Accident & Incident Reporting training carried out at all Equity premises to all staff.

By means of these reporting channels, any incident of significance (Major / Crisis) that must be reported to the UK H&S regulator (HSE) will come to the attention of the Health & Safety Advisor and / or Head of Operations, one of whom will then carry out the legally required report to the regulator, in accordance with the requirements of the RIDDOR Regulations. Please see our MIM Grab Guide for full details.

6.02 Alcohol and Drug Consumption

Work activities should not be undertaken where medication or any other substance has been consumed which could inhibit or adversely affect an employee's ability to work and operate any work equipment safely (including vehicles). If it is necessary to take medication that could cause these negative effects, this should be discussed with the Head of Human Resources or the Health and Safety Advisor, so that a Risk Assessment taking into account the bespoke role requirements and work duties can be carried out.

Equity's Alcohol and Drug Policy is detailed in the New Employee Handbook. Equity does not condone the misuse of any substance and will balance the need for disciplinary action with an understanding of an individual suffering with self-abuse



issues in need of appropriate personal support. Any such persons should come forward and seek advice and guidance on access to professional supportive services from the Human Resources department. All such matters will be dealt with confidentially.

6.03 Auditing Process and Procedures

Under School Travel Forum Assured Member requirements, Equity must ensure that all accommodations, coaches, tutor, guides used for Tour, Ski, Sport, Music and Battlefield Group bookings are successfully audited, assessed by a competent qualified School Travel Forum auditor prior to use. All audits are reviewed in line with the School Travel Forum CoP.

6.04 Control of Contagious Illness

Equity seeks to manage and control any Norovirus like winter bug or illness in our Clubhotel premises' by way of the Procedures set out in the 'Clubhotel Manager Manual'. We also seek client engagement, as set out in a section regarding Norovirus in our 'Essential Information' H&S booklet.

Equity will monitor the occurrence of any Norovirus like illness (via our Incident Reporting Procedures) and react accordingly. We will manage any other ad-hoc contagious illness on a case-by-case basis, in accordance with any regulatory, travel authority or medical guidance. In the case of an outbreak of an ad-hoc contagious illness within an Equity premises, the Overseas Operations Manager, Health and Safety Advisor or premises managers will provide staff with information and advice on control and prevention measures through preseason training and will endeavor to provide any reasonably practical control or preventative equipment where needed.

6.05 Control of Contractors, Visitors & Work Experience

Where appropriate, each Equity premises is to have defined Visitor Reception Procedures. From this, it follows that a visitor can be advised of any unusual or specific site hazards, restricted areas, fire safety and first aid arrangements etc., or assigned to the supervision and care of the person(s) they are visiting. This is also the procedure for short-term Work Experience persons, who would either be under the care of a designated supervisor in the workplace, or in the case of long-term Work



experience persons, be subject to a lesser version of the New Employee H&S Induction on arrival.

Where formalised Visitor Reception Procedures are in place, Equity monitors their effectiveness, such as at Brighton office where Contractors and Visitors are required to sign in and out and receive an Emergency Arrangements summary information slip. We seek to manage the selection of regular and / or 1+ day contractors and control the supply of their services by way of our 'Contractor and Supplier Management Procedures' and associated Checklist.

6.06 COSHH – Control of Substances Hazardous to Health

Within the Brighton office, there are very few substances present that require a Risk Assessment for their use. Where present, a substance specific Risk Assessment will be made by the contracted cleaning team and recorded in writing and brought to the attention of all relevant staff. In the case of lithium-ion laptop batteries and printer toner cartridges, IT are tasked with keeping hazardous substances out of the Brighton office workplace or limiting the introduction of any such substances. However, substances with associated hazard warning symbols are present, but where these substances are familiar in everyday life, such as Tipex, marker pens, and domestic kitchen cleaning products and pose minimal risk of harm if used normally, it is not appropriate to produce a written Risk Assessment for the use of such substances.

Clubhotel premises make use of hazardous chemicals in kitchen and housekeeping cleaning tasks. French regulations do not require COSHH Risk Assessments, but instead the presence of MSDS - Material Safety Data Sheets. These are completed pre-season for all Equity premises. The Clubhotel Managers are tasked with liaising with chemical suppliers to ensure that hazardous chemicals are avoided where possible, but where necessary, are used to a minimum and / or the least hazardous substance is selected. The Clubhotel Manager will obtain MSDS for chemicals in use in their respective premises from the supplier in a language premises staff can easily understand (English). Equity also organises for our chemical suppliers to provide training sessions in the use of their products, which includes the need for and correct use of PPE - Personal Protective Equipment relative to each chemical product.



6.07 Communication & Consultation

Equity proactively communicates H&S information to staff, visitors and contractors by way of the New Employee H&S Induction, the Company Intranet, top-down cascade briefings, direct Email contact, presentation briefings, formal training sessions and on-the-job training, Health and Safety Policy and Procedures documents, the New Employee Handbook and instructional or warning signage. Consultation with staff can take place via any of these communication channels.

Externally we communicate H&S information to clients by way of our 'Essential Information' H&S booklet, our websites, our brochures, our booking Terms and Conditions, direct written or verbal contacts, our Itinerary and other trip specific documentation, our Supplier Audits and where appropriate to have, our Guidance documents. Equity has 'Procedures for Acting on Travel Advice (FCO, ABTA etc.) Notifications'.

6.08 DSE – Display Screen Equipment

Forming part of the New Employee H&S Induction, relevant staff are provided with information, instruction and training in the use of DSE. This includes advising staff of the 'reasonable adjustments' they are legally entitled to for free and of our voucher scheme with Specsavers to cover the cost of bi-annual sight tests.

Equity considers all staff in the Brighton office as 'DSE Users'. On the basis of DSE use for periods regularly exceeding an hour, only certain overseas Clubhotel staff are considered 'DSE Users'. DSE information, instruction and training guidance and Self-Assessment forms are made available to staff via the intranet and shared computer files, so that an employee can undertake a Self-Assessment whenever the need arises / their workstation arrangements change.

In addition, the session covers the requirement for an assessment of DSE use at their workstation (for both office and home workers); Equity operates a system of Self-Assessment. Self-Assessment forms are forwarded to the Health & Safety Advisor for review, provision or implementation of reasonable adjustments and filing. The need for reasonable adjustments of significant cost must be supported by medical evidence.



6.09 Driving & the use of Private / Company Vehicles at Work

In accordance with the Equity UK Car Policy, the Company has a system of checking employee driving licences and personal vehicle insurance (for business use) and a requirement for a signed Driver Declaration, maintained by the Human Resources department. Similar takes place in respect of overseas drivers, in accordance with Overseas Driver Procedures and associated Overseas Driver Registration Form, maintained by the Clubhotels Controller in respect of Clubhotel drivers.

The issue, maintenance and monitoring of UK Inspiring Learning vehicles is overseen by the Transport Manager and vehicle insurance and breakdown assistance are in place. The issue, maintenance and monitoring of French Inspiring Learning vehicles is overseen by the Overseas Operations Manager and vehicle insurance and breakdown assistance is in place. Staff employed to act as Inspiring Learning drivers during the winter ski season, based in the French Alps are subject to accompanied / supervised drives and provided with in-house driver training and supervision (specific to the winter mountain environment).

Vehicles are kitted out in accordance with the national requirements of the countries and relative to the environment they will operate in. Vehicle pre-use check and defect reporting systems exist and are recorded.

6.10 Electrical Safety

In UK premises, the Health and Safety Advisor ensure that mains and portable appliance electrical tests and inspections are taking place in accordance with the requirements set out in the current IET Institute of Engineering and Technology (4th Edition) Code of Practice, which currently allows for Risk Assessment to determine frequency. (Normally subject to annual PAT)

Based on the previous Code of Practice, in the case of a low risk office environment, this is a 5 yearly mains inspection and bi-annual portable appliance testing, with visual inspection taking place in-between and a Portable Appliance Inventory maintained.

In the case of French Clubhotel premises, these actions lie with the Clubhotels Manager and relative to French national (electrical) regulatory requirements.



Equity has a Policy that personal Portable Appliances cannot be brought into the workplace without being subject to electrical inspection and labelled as such, which is set out in the New Employee Handbook.

6.11 Emergency Evacuation Procedures

In the event of needing to leave any Equity premises because of an emergency situation, such as a gas leak or presence of a chemical / biological hazard, the Fire Evacuation Procedures for the building should be employed. Please refer to the Equity Security & Protection Procedures following Terrorism Threats.

5.12 Expectant, New and Nursing Mothers at Work

Expectant, New and Nursing Mothers are subject to a bespoke Risk Assessment, issued by Human Resources, completed by them with their line manager, signed off by the Health and Safety Advisor and returned to the Human Resources department for keeping in personnel files. Depending on RA outcome, job role and responsibilities may be amended.

5.13 Fire Safety

Equity has multiple qualified (volunteer) employees within the Brighton office to act as workplace First Marshals. Numbers of Fire Marshals appointed has been led by general guidance, based on number of employees, number of offices, building floors and nature of the workplace and cover for sickness and holiday absence. Equity will ensure that where the volunteer member of staff wishes to remain appointed, their qualification remains valid and is renewed when necessary at Equity's expense.

The Health and Safety Advisor ensures that a Fire Safety Risk Assessment is in place for the Brighton office, made and kept current by a technically competent person.

Also that the provisions are in place for the Brighton office testing and inspections take place at required intervals, which are recorded by either agents of the building landlord, or in an internal Fire Safety Log book, relevant to areas of separate or shared responsibility: emergency lighting, fire extinguishers, fire alarms, fire detectors, unobstructed fire evacuation routes and evacuation practice.

The Clubhotel Managers ensure that the following fire safety provisions are in place where appropriate for the premises under their control, of which testing and inspections take place at required intervals, which are recorded in the premises Log



book where required: fire blankets in kitchens, emergency lighting, fire hoses and extinguishers, fire alarms, fire detectors and evacuation route desefumage systems.

Clubhotel Fire Evacuation Procedures should be promptly explained to new staff and periodically practiced by Clubhotel Managers, including the use of a fire evacuation chair, supported by Guidance set out in the Clubhotel Manager Manual.

Subsequently, weekly Clubhotel fire alarm evacuation drills take place, but for the benefit and participation of guests more than staff.

Use of fire extinguishers on Company premises should only be by staff that have received training in the use of, provided by Equity and even then, only where they believe the situation allows for and does not jeopardise their personal safety in doing so. Use of fire extinguisher by other persons is not prohibited, but is undertaken at that person's own volition, where they feel personally competent to do so.

The safe evacuation of people: staff, guests and visitors is the primary objective and this message should be conveyed by any Company (premises) Manager with a responsibility providing staff with fire safety information, instruction or training. Never jeopardise personal safety in the interest of safeguarding property, personal belongings or documents.

All Equity premises both UK and Overseas operate a 'No Lit Candles' Policy.

5.14 First Aid

Equity has appointed suitably qualified (volunteer) employees within the Brighton office to act as workplace First Aiders. Numbers of First Aiders appointed has been led by HSE guidance, based on number of employees, number of buildings, building floors and nature of the workplace and cover for sickness and holiday absence. Equity will ensure that where the volunteer member of staff wishes to remain appointed, their qualification remains valid and is renewed when necessary at Equity expense.

Equity advises Brighton office staff of their designated First Aiders and general first aid procedures by way of the intranet and H&S Notice Board. This document is also issued as part of the New Employee H&S Induction. Brighton offices also have a designated First Aid treatment room.



French, Spanish, Italian and Austrian legislation does not require the appointment of First Aiders in the workplace. Equity however endeavours to have appointed First Aiders present in all its workplaces for the benefit of staff. Whilst this is not always possible in the case of low number occupied premises, this is usually possible in the case of French Clubhotels. Equity seek to use those staff already qualified to volunteer, ensuring they are appointed on provision of a current suitable qualification and if they remain in post for the full term of their contract, are paid a token 'thank you' payment.

5.15 CIEH - Food Safety Management

Equity ensures that all Clubhotel food handling staff and any manager with a responsibility for safe food production by a premises have received L2 Food Safety training. If an employee failed the exam and is in the role of a key food handler they would be encouraged to re-sit and would be provided with retraining if necessary. If such an employee remained unqualified they would be monitored to ensure that they are suitable for the post. As a CIEH Registered Training Centre, Equity can deliver the L2 Food Safety training directly, or employ the services of a qualified / registered trainer. The Health & safety Advisor has a L3 qualification.

Equity operates premises with a food safety system based on the principles of HACCP methodology in place, as required by EU legislation. Our Clubhotel premises must also comply with French food hygiene legislation, which includes the employment of an appointed contractor to undertake kitchen inspections and analysis of food samples.

Equity also undertakes kitchen Self Audits, conducted by the Clubhotels Controller, and Clubhotel Managers.

5.16 Gas Safety

UK Equity premises have no gas services. In the case of French Clubhotel premises, where gas is used to cook in the kitchens, the Overseas Operations Manager ensures that that gas system tests and inspections are taking place (annually) in accordance with French national (gas) regulatory requirements, that all appropriate gas safety



signage is displayed and the means to shut the system down / gas supply off is easily identifiable and accessible to staff.

5.17 General Safety, Security, Maintenance, Housekeeping, Welfare Facilities of Brighton Office and Other Premises

The Health and Safety Advisor will ensure suitable, sufficient and safe provisions and adequate welfare facilities. All defects or problems concerning the internal fixtures, fittings of and services to Equity premises will be managed by the Health and Safety Advisor.

- Telephone and IT defects or problems lie with the IT department to resolve.

General cleanliness and hygienic practices in refreshment / drink / meal preparation areas will be monitored by the Health & Safety Advisor and direction to staff issued when appropriate, to ensure users of communal areas respect the facilities provided for their benefit and for use by colleagues, supported by the issue of the Kitchen Cleaning Rota.

Brighton office operates a clear desk policy on a Thursday, which staff must comply with, to leave their desk clean and as clear of clutter as possible, to provide the cleaners with access to desk surfaces to clean them. Tubs of antibacterial wipes are provided for staff to clean their telephone headsets and keyboard surfaces. Staff must extend this approach to their immediate environment and the office as a whole, tidying away loose cables and covering them where exposed in open floor spaces, highlighting trip hazards that require remedial work, dealing with spillages, appropriately disposing of personal waste.

Where they are present, floor to ceiling panes of glass that could be mistaken for an open door will be demarked by way of window stickers at adult (1.5m) and child (0.8m) eye line height.

Equity provides 'slippery floor' warning signage for use in all Company premises.

Arrangements exist in the case of the Brighton office, whereby SIA qualified security staff can be called upon at short notice to assist with the (foreseen) removal of any aggressive person from the building and / or supervise entrance to the building at the ground floor main entrance doors to obstruct non-building occupants from



entering. Equity is also able to arrange for a change to both main entrance door keypad key codes at short notice.

5.18 Harassment, Bullying & Violence in the Workplace

Harassment or bullying behaviour in the workplace is unacceptable. When evident or reported by employees, it will be dealt with confidentially by Human Resources and line managers by way of the Equity Harassment & Bullying Policy and possible Police involvement where appropriate in respect of criminal harassment offences. Violence or threatening behaviour (a form of bullying) in the workplace is equally unacceptable to Equity.

Where this is staff on staff or staff on client instigated, it will be dealt with by Human Resources and line managers by way of our Disciplinary Procedures and possible Police involvement in respect of criminal assault offences. Where this is client on staff instigated, it will be dealt with by invoking the provisions of our booking Terms and Conditions and possible Police involvement. ABTA membership requirements prevent us from compiling a client 'blacklist'.

Where staff believe they are going to face a foreseeable situation of potential violence or threatening behaviour, they should seek and be provided with additional physical presence to control the situation. Equity's Accident and Incident Reporting and monitoring systems allow for the monitoring of incidents involving violence or threatening behaviour and for any patterns or repeat events to be identified. Where this is the case, Equity will seek to implement additional staff protective measures.

5.19 Health Surveillance and Risk Assessment

There are currently no operations that expose employees to specified or other significantly harmful hazardous substances or environmental conditions that require medical surveillance. Ad-hoc health surveillance where appropriate or necessary on a personal case-by-case basis, in the case of for example an occupational health condition, is organised by Human Resources.

Equity primarily identifies potential hazards to clients and assesses the risk of employing the services of a supplier by way of supplier H&S Self Audits, on-site H&S



Inspection Audits, Document Unique for France and trained H&S Auditors, in accordance with the procedures and requirements on members set out in the School Travel Forum Code of Practice, specifically of accommodation, coach, ski equipment, ski lift, ski school, tour guide, excursion and activity providers. Such supplier checks on the elements of our package tours also meets the requirements on us as a Tour Operator imposed by the Package Travel Regulations. Equity also employs the services of third party Technical Advisors to assist with the hazard identification and Risk Assessment of adventurous activity providers.

5.20 IT Server Room

Staff, visitors or contractors should not enter the Server room unless escorted by a member of IT; the Server room is a noisy, narrow and potentially dangerous working environment and it is in the interests of safety that the number of people entering the room is restricted and kept to the bare minimum. All staff or Contractors must make it known to another member of staff that they are working in there, especially in the case of any lone working.

There is a significant amount of cabling attached to and around the main servers, which is a potential trip hazard; it is the responsibility of IT staff to make sure that cables are positioned at a suitable level and main walkways are kept clear of cables and other obstructions. Caution must be exercised at all times when moving around within the room. Due to the nature of the Server room, there is a lot of live electrical equipment operating; liquids are therefore prohibited at all times. None of the equipment should be touched by anyone who is not a member of the IT team. When equipment needs to be handled, it must first be switched off and disconnected from the main electrical supply. Otherwise there is a risk of electrocution and injury from live / moving parts.

In the event of a Server room fire, a CO2 fire extinguisher can be found in the corridor; Fires in the Server room should only be dealt with by CO2 extinguishers, to prevent electrocution and equipment damage. Fire should be tackled by the (trained) Fire Wardens and all people should leave the area, the Server room door closed, the fire alarm raised and the building evacuated in accordance with Equity Fire Evacuation procedures.



5.21 Legionella Management Control

The Landlord of the Brighton office makes arrangements for water safety sampling and analysis and is responsible for suitable pipework and water temperatures and any holistic super chlorination or superheat treatment, in accordance with a Legionella Management Plan. Brighton office is heavily used Mon - Fri, so require a constant draw from the chlorinated mains water supply and the shower is usually used weekly, if not daily and so the pipework serving them is flushed through on a regular basis. Brighton office employs cleaners to keep bathroom fixtures and fitting clean and free from lime scale.

Clubhotel and Chateau premises operate with a Legionella Management Plan in place, based on the industry standard (ABTA / FTO) 15 Point Management Plan, but adapted and applied bespoke to their premises. The European Clubhotels General Manager also arranges for annual water safety sampling and analysis in accordance with French regulatory requirements.

5.22 Lift Safety

In the case of Equity's Brighton office, the Health and Safety Advisor ensure that lift tests and inspections are taking place in accordance with the requirements set out in the LOLER Regulations (minimum 6 monthly inspection for equipment lifting a human load) and that all appropriate lift safety signage is displayed and the means to raise an alarm in the event of entrapment is present. In the case of French Clubhotel premises, these actions lie with the European Clubhotels General Manager, relative to French national (lift) regulatory requirements.

5.23 Lone Working

Equity allows lone working in the Brighton office, because of our need to contact parties in other time zones and manage serious incidents 24/7. Therefore, Equity ensures that lone worker arrangements are in place, as set out in the 'Brighton Office Lone Worker Policy and Procedures'. Brighton office staff must comply with the Policy, or can be subject to disciplinary procedures, as the Policy exists to protect the safety of employees. A third party external contractor will attend should the intruder alarm be raised out of hours.



5.24 Manual Handling

Forming part of the New Employee Induction, staff are provided with information, instruction and training in good manual handling techniques, for them to employ in the field / office for their own benefit. In addition, all Equity premises are equipped with manual handling aides where appropriate and recognises the need to provide suitable and sufficient manual handling aids in the event of any abnormal ad-hoc manual handling undertaking.

5.25 Machinery & Equipment

It is unacceptable to Equity that faulty machinery or equipment remains in service and available for staff use. Equity is committed to only providing safe, suitable and (where appropriate) maintained machinery or equipment to staff and clients for their use and identifying any defective item in the workplace, where the deficiency causes the item to be unsafe for use.

The purchase and installation of new items is to be managed by the relevant overseas premises manager, in conjunction with the Clubhotels Manager and Clubhotels Controller where applicable, or in the case of Brighton office, the Health & Safety Advisor. The overseeing manager must also ensure that staff receive training in the use of the new machinery or equipment if appropriate and training in the use of any potentially hazardous items present on their site, or come to the site already technically competent in the use of, which has been established via recruitment procedures.

In this respect, specific training in the following is provided and recorded by Equity:

- Use of the snow clearing machine at the Clubhotels
- Use of Clubhotel hazardous kitchen equipment
- Clubhotel Ski Technician (issue, fit and maintenance of ski equipment) role

5.26 PPE – Personal Protective Equipment

PPE will be provided to employees at no cost to them, as the least preferable method of controlling risk, but as Risk Assessments and workplace training dictates. Line managers must ensure that PPE is worn and work correctly where required, that it is supplied with a CE mark of conformity, that there are suitable places available for the storage / drying of reusable PPE and where the PPE is for long term reuse, that it is subject to any inspection or maintenance requirements set out in manufacturer's instructions.



5.27 Stress Management

Equity recognises that work related stress is a workplace hazard and therefore needs to be eliminated or reduced where possible and significant identifiable trigger factors (causes) risk assessed and control measures put in place. In the case of stress management for an individual, Equity has appointed psychological and emotional support services available to staff with Head of Department approval on a case- by- case basis.

5.28 Training Arrangements

Equity provides role specific training to all UK, Overseas Clubhotel Staff, Reps and Ski Technicians ensuring they receive specialist training. All overseas staff records are detailed within their individual training booklets kept by Clubhotel Managers. Ski Technicians receive accredited in house training by Salomon prior to the season starting, certificates are again kept by Clubhotel Managers. Chefs receive accredited Level 2 Food Safety in Catering, Kitchen Hazards & Equipment Training prior to undertaking their season. A non-exhaustive list of other training - Fire Safety training, First Aid, New and Refresher Accommodation and Coach auditor training is conducted through STF, CPT and Argent when required in line with School Travel Forum CoP.

5.29 Travelling for Work

Any task required of the employee by the employer is considered 'at work' and all normal health and safety requirements apply. Equity seeks to ensure the health, safety and welfare of an employee travelling for work purposes as far as is reasonably practical, by way of a Travel Checklist to be completed in the case of overseas travel, when the environment is likely to be more unfamiliar and potentially hazardous than travel within a home country. A completed Travel Checklist should be required by the line manager agreeing or instructing in the need for the overseas travel. This process forms the basis of a Travel Risk Assessment.

5.30 Working at Height

Those with control (premises managers, Health & Safety Advisor, a person employing another to work at height) of a task that could result in a fall or falling object with the potential to cause injury to self or other, have a duty to sufficiently



manage the task to control the associated risks. This includes ensuring that all equipment provided in the workplace for the purpose of working at height is suitable, in a safe (maintained) defect free condition and where appropriate, only operated by a competent person, even when the operator is a third party. Any lifting equipment owned by Equity for the purpose of working at height must be subject to the testing and inspection regimes set out in the LOLER Regulations where appropriate.

5.31 Young Persons at Work

Any Equity employee under the age of 18 will be subject to a Risk Assessment prior to them entering the workplace. The relevant line manager will be informed by the Health and Safety Advisor of any control measures that must be applied or any aspect of the role that must be avoided or limited, relative to the young person under their supervision and care before they start work. Where the young person is below compulsory school leave age (16), their parent / guardian will be sent a copy of the assessment and their consent permitting the young person to undertake the role as set out is required before they can start work. The line manager cannot significantly change the work duties of a young person without repeating these assessment procedures. In the workplace, the young person will be supervised by a designated person, to be appointed by the line manager.

5.32 Monitor, Audit & Review

We will use the outcomes from significant incidents, site inspections, internal and external checks, inspections and audits and feedback from guests and staff to monitor the effectiveness of our Health and Safety arrangements and where necessary / appropriate, the Health and Safety Advisor will review and improve any applicable Risk Assessment. Where significant amendments are identified as necessary, to improve either this Policy or the Procedures that support it, these will be implemented on an ad-hoc basis following consultation with the relevant employees and all employees informed of the changes. Otherwise, this Policy will be reviewed on an annual basis.