



Global Policy Corporate | Health and Safety

Policy reference | ORG 03

Table of Contents

Policy Standards and Purpose	2
Introduction.....	2
Purpose.....	2
Scope	2
Equality Impact Assessment	3
Terminology and Definitions	3
Breaching of this Policy	4
Additional Resources	4
Related Policies and Guidelines.....	4
APPENDIX A United Kingdom (incl. Northern Ireland)	7
Risk Assessments	7
Accident Prevention.....	9
Manual Handling and Ergonomics	11
Display Screen Equipment (DSE)	12
Driver and Road Safety	12
First Aid	12
Fire Safety.....	12
Contractor Control Arrangements.....	13
Incident Management.....	14
Communication and Training	14
Implementation Plan.....	15
APPENDIX B United States	15
General Safety Rules	15
APPENDIX C Australia	17
Responsibilities.....	17
Consultation & WH&S Representative	18
Staff Training.....	19
Hazard and Safe Work Practices.....	19
Workplace Injuries or Incidents	21
Fire Safety.....	22
APPENDIX D Other International Locations	23
Acacium Brands	23
Document Control Log	8
Document Control History	8

Policy Standards and Purpose

Introduction

At Acacium Group, we are committed to providing a healthy and safe working environment for all employees, contractors, and visitors across our global premises. As a UK-based employer, our Health and Safety framework is based on United Kingdom statutory requirements and best practices which usually exceed requirements in other countries. Each country where Acacium Group maintains a presence will also adhere to their specific local regulatory obligations.

Everyone is responsible for fostering a safe and healthy workspace, including taking reasonable measures to safeguard one's wellbeing and those impacted by their actions, omissions, or oversights. As an organisation, we regularly evaluate workplace risks and take positive measures to eliminate or minimise them.

Our Health and Safety management system is central to our approach and designed to improve our workplaces continuously. Its purpose is to avert accidents, incidents, and health issues, ensuring compliance with relevant regulations and legislation.

Purpose

To ensure that we provide a healthy and safe environment for all employees, contractors, visitors and other relevant parties, and remain compliant with all applicable health and safety legal requirements. That best practice health and safety management standards are implemented and maintained across the organisation.

Our Health & Safety objectives are:

- To ensure, as far as is reasonably practicable, the health, safety, and welfare of all employees, and those visiting Acacium Group premises or using services provided by the organisation.
- To ensure that the workforce is competent to undertake the tasks required.
- Follow all current health and safety legislation, regulations, and Approved Codes of Practice.
- To provide safe and healthy conditions for work, plants, and systems.
- To ensure safe handling and use of hazardous substances.
- To raise the level of knowledge of all the employees on health and safety through the provision of education and training programmes.
- Consult with the employees on matters affecting their health and safety.
- Ensure that audit systems are in place for the monitoring of work practices against the relevant policies and SOPs.
- To assess and manage risks in all working and client environments to ensure that we identify all risks and minimise them as far as is reasonably practicable.
- To review this Policy annually and revise it as necessary considering any developments in industry standards, guidance, and legislation.

Scope

This policy outlines the principles and arrangements that underscore our organisational commitment to Health and Safety and our compliance with relevant legislation.

This policy encompasses all employees within Acacium Group entities worldwide, spanning various locations. It also extends to any individuals or organisations availing themselves of our services or using our premises. Furthermore, it is essential to highlight that we may also conform to policies or guidelines set forth by our clients, specifically those relevant to the services offered by our business. This scope applies to bank

personnel, temporary staff, volunteers, young employees, individuals working from home, and contractors engaged in company-related activities.

Equality Impact Assessment

Acacium Group is dedicated to equality, diversity, and inclusion. Aligned with our values, we work diligently to ensure that every member of the Acacium community receives fair treatment without discrimination, considering their unique needs and characteristics.

In pursuit of this commitment, we have conducted an Equality Impact Assessment on this policy/procedure. This information is centrally stored; to obtain this, please send a request to the People team at people@acaciumgroup.com.

Terminology and Definitions

Term	Definition
Risk	The chance that an event will occur, measured by likelihood (frequency or probability) and severity (consequence). In the context of the company's activities, risk encompasses anything that impacts on the care of an employee, patient or service user.
Hazard	Something that has the potential to cause harm, damage, or adverse health effects to a person.
Risk management	A structured approach to identifying, assessing, controlling and communicating risks to minimise losses and maximise opportunities.
Accident	An event that has unintentionally happened resulting in damage, injury, or harm.
Incident or 'near miss'	An event that did not result in harm but had the potential to do so.
Ill health	Any condition that affects a person's physical or mental health.
Risk management systems	A set of processes and procedures that help organisations identify, assess, and control risks according to statutory requirements, Approved Codes of Practice, and industry guidance.
Health and Safety Management System (HSMS)	A set of policies, procedures, and plans that are used to help an organisation manage its health and safety risks.
Competent person	A person who has the necessary skills, knowledge, and experience to undertake a particular task safely.
First aid	The immediate care given to someone who is injured or ill.
Personal protective equipment (PPE)	Equipment worn by employees to protect themselves from harm. Examples of PPE include hard hats, safety glasses, and gloves.

SharePoint	A Microsoft platform that helps teams work together more effectively by providing a central place to create, store, organise, and share information and documents.
------------	--

Breaching of this Policy

Employees found to be in breach of this policy after a due investigation process may be subject to disciplinary action. Possible outcomes of breaching this policy include verbal or written warnings or termination of employment in cases of gross misconduct.

Additional Resources

Policy requirements and legislation differ across the countries we operate in. The policy as outlined above and up to this point, applies to all regions. To find further location-specific policy information, please consult the following:

- Appendix A | All policy information specific to the UK.
- Appendix B | All policy information specific to the USA.
- Appendix C | All policy information specific to Australia.
- Appendix D | All policy information specific to other countries.

Related Policies and Guidelines

In conjunction with this policy, we also recommend that you read the following:

Policy or Guideline	Applicable Region		
	United Kingdom	United States	Australia
Clinical Risk Management Policy (CLIN01)	✓	-	-
Associate Training and Induction Policy (CLIN17)	✓	-	-
Incident Reporting Policy (ORG04) (ORG04-1 Scotland) (ORG04-2 NI)	✓	-	-
Equality, Diversity, and Inclusion Policy (CORP07)	✓	✓	✓
Risk Management Strategy (CORP11)	✓	-	-
Transporting a Service User (CLIN25)	✓	-	-
Acacium Group Moving and Handling Policy (CLIN18)	✓	-	-
Safe Use of Medical Devices Policy (CLIN12)	✓	-	-
Policy on Policies (CLIN10)	✓	-	-
Substance Abuse Policy	✓	-	-

Standard Operating Procedures (SOPs)

We recommend familiarising yourself with the following SOPs:

SOP Name	Applicable Region		
	United Kingdom	United States	Australia
Lone Working (HS02 Associate) (HS04 Employee)	✓	-	-
Management Onsite Contractors (HS05)	✓	-	-
Risk Assessment (RISK01)	✓	-	-
Emergency Management Manual	-	✓	-

Risk Assessments

The foundation of improved health and safety lies in conducting thorough risk assessments; these assessments should take place as close to the actual task or operation as possible and involve employees, contractors, and individuals with a solid understanding and background knowledge of the specific work area.

Ongoing Monitoring for Safety

We advocate for ongoing monitoring and periodic spot checks conducted centrally to ensure adequacy and sufficiency. Trained officers stationed within the central team and community healthcare will complete regular spot checks.

Responsibilities

Line Managers should work together with the Facilities and People team or other designated individuals and suitably briefed employees to perform risk assessments. It's important to emphasise that delegating tasks does not absolve managers of their responsibilities. Please refer to the Acacium Group Risk Assessment SOP for details.

Divisional Oversight

The division oversees the outcomes of risk assessments and, where applicable, adds these to the divisional risk register. The divisional Datix risk registers also document clinical or community-related risks. Significant risks will be escalated to the corporate risk register, subject to formal bi-monthly review during each division's Business Review meeting. The Chief People Officer and Group Clinical Director will report risks and procedural updates to the Board every quarter.

Training and Accountability

Line Managers and other relevant individuals are mandated to take part in risk assessment training and undertake the role of risk assessors for their respective areas of responsibility. All Line Managers and other competent individuals are accountable for ensuring that risks are either eliminated or, if not possible, reduced to the lowest practical level. Line Managers must revisit risk assessments under the following circumstances:

- After an incident occurs.
- Following recommendations from audits/inspections.
- When updated safety information becomes available.
- Upon changes in working methods.
- In case of modifications to health and safety legislation

Additionally, where appropriate and necessary, risk assessments should be conducted for any of the following identified risks:

- Manual handling
- Display screen equipment (DSE)
- Personal protective equipment (PPE)
- Asbestos
- Control of Substances Hazardous to Health (COSHH)
- Noise
- Fire
- Electromagnetic fields (EMF)
- New and expectant mothers
- Lone working
- Home working
- Young people
- Pregnancy

Please note that this list is not exhaustive.

Five Steps to Risk Assessment

Risk assessment is an important part of any health and safety management system. It helps to identify hazards and assess the risks associated with them, so that appropriate control measures can be put in place to reduce the risk of harm.

There are five steps to risk assessment:

1. Identify the hazards. This involves identifying anything in the workplace that could cause harm, such as:
 - Hazardous substances
 - Machinery
 - Working at height
 - Manual handling
 - Slips, trips, and falls
2. Assess the risks. Once the hazards have been identified, in collaboration with the facilities and people team, we will assess and determine the level of risk. This involves considering the likelihood of the hazard occurring and the severity of the harm that could be caused.
3. Determine the control measures. Once the risks have been assessed, agreed control measures should be put in place to reduce the risk of harm. Control measures can be engineering controls, administrative controls, or personal protective equipment (PPE).
4. Implement the control measures. Once the control measures have been determined, they need to be implemented and properly used.
5. Monitor and review the risk assessment. The risk assessment should be reviewed on a regular basis to ensure that it is still accurate and that the control measures are still effective.

Taking Action

The Risk Assessment process and findings are documented in the central Datix system and assigned to the relevant Functional or Divisional lead who:

- Takes necessary action to remove or control risks.

- Ensures the implementation of required actions.
- Checks that the implemented actions have removed or reduced the risks.
- Reports incidents via the Datix system following the Acacium Group Incident Reporting policy.

The Chief People Officer can offer further support and advice on the risk assessment process where required.

Office Locations

In our office sites, the task of conducting risk assessments falls to a member of either the People Team or the Property Management team, depending on the specific type of assessment required.

These assessments thoughtfully consider the characteristics of the workplace, the activities taking place, and the individuals who might potentially encounter hazards. Moreover, this process extends its scope to include not only our employees but also contracted organisations, and any other individuals potentially affected by the activity, including service users and patients whom our managed services may impact.

We review Risk assessments as part of an annual cycle or when there are changes in work activities, whichever comes first.

Activities and the Workplace

The risk assessment process comprehensively encompasses all activities undertaken by Acacium Group and all work areas where Acacium Group employees are engaged. When Acacium Group employees are operating within the premises of another employer, risk assessments are requested from them.

Further insights into risk identification and analysis can be found in the Acacium Group Risk Management Strategy, the Clinical Risk Management Policy, and the Risk Assessment SOP.

Collaboration Across Organisations

Risk tends to be most pronounced at the juncture between organisations, making it challenging to define clear responsibilities and accountability. Acacium Group collaborates with other entities to spot and address health and safety risks, assigning them the correct priority within the Acacium Group Risk Register. Collaborative action plans between organisations must explicitly outline responsibility for executing each action, the process for reporting deviations, and the approach for resolving exceptions or disputes. Examples of other entities include:

- Those with whom Acacium Group jointly provides services.
- Those with whom Acacium Group shares service commissioning.
- Those with whom Acacium Group shares premises.
- Other healthcare institutions.
- Social services.
- The police.
- Statutory/regulatory bodies, charities, and voluntary organisations.
- Client representative groups.
- Local authorities.

Accident Prevention

Many workplace accidents can be prevented. To avoid accidents, Acacium Group employees should:

- Always follow good housekeeping practices to minimise potential accidents.
- Adhere to a straightforward 'clean as you go' approach, always ensuring a tidy work environment.
- Follow safe storage practices and support reasonable housekeeping efforts to prevent accidents by reducing the risk of slips, trips, and falls.

Preventing Slips, Trip and Falls

All activities with the potential for slips, trips, or falls are assessed through a risk assessment. Necessary controls are implemented to prevent such incidents. Given the unique characteristics of each building, the UK Facilities Manager must conduct a comprehensive risk assessment for each facility to avert accidents. All employees should remain vigilant of trip hazards. Accidents related to slips, trips, and falls can be significantly reduced by keeping floor spaces clear of objects and obstructions.

Equipment

All supplied work equipment will be 'fit for purpose.' Acacium Group ensures that our work equipment is suitable for its intended use and that we keep it in good working order. The Line Manager or appropriately briefed employees are responsible for identifying and maintaining all equipment.

Personal Protective Equipment (PPE)

Employees are provided with and instructed to use the necessary PPE essential for carrying out their roles safely. This includes wearing aprons, gloves, goggles, masks, and other relevant items when needed.

Electrical Items

All electrical equipment owned or controlled by Acacium Group undergoes Portable Appliance Testing (PAT). The frequency of inspecting and testing equipment within the offices is decided by the UK Facilities Manager, with arrangements in place for bi-annual testing.

Safe Use of Substances / Control of Substances Hazardous to Health (COSHH)

Risk assessments are conducted for clinical and non-clinical purposes when Acacium Group employees must use substances. These assessments document the proper handling, storage, transportation, and disposal procedures. Acacium Group gives training on using hazardous substances, and tasks that expose employees to health-hazardous substances should only be undertaken with the proper controls in place.

Compressed Gas

When using compressed gases, Acacium Group ensures the correct handling, storage, transportation, and disposal of these gases. Adequate training is provided to employees engaged in using compressed gases, enabling them to do so safely.

Safe Use of Medical Devices

When Acacium Group employees are working on non- Acacium Group offices they should:

- Follow the Safe Use of Medical Devices Policy for that location.
- Ensure that all equipment is fit for purpose and safe for use.
- Use the device only if they have been trained to use that device. They should not use the device if training has yet to be received.
- Report any damage to a medical device to the host client organisation.

When working in the community, the rule is, 'If the Acacium Group employee has not been shown how to use the medical device, it should not be used'.

Ionisation and Radiation

The Ionising Regulations' Approved Code of Practice provides employer guidance on ionising radiation risk management, under which, employers are required to control and monitor employees' exposure. Where employers share a workplace, even temporarily, they must cooperate and make suitable arrangements to ensure that dose limits are upheld.

Any Acacium Group employees delivering services where ionization is relevant should be familiar with local NHS trust policies or procedures, and that risk assessments are completed as required to reduce risk or harm to the employee.

Lone Working

'Lone employees' are those who work without direct supervision. This includes employees based in external buildings not controlled by Acacium Group, including domestic premises. Employees should work together with their line managers to conduct a risk assessment to manage lone working risks.. Acacium Group employees must notify their Line Manager or relevant others of any illness or medical condition that might affect their work. Refer also to HS 02 Lone Working and Personal Safety – Associate SOP and HS 04 Lone Working – Employee SOP Policy.

Manual Handling and Ergonomics

Every manual handling situation is evaluated based on the specific task, individual, load, environment, and appropriate control measures are implemented accordingly. All handling activities, which include lifting, pushing, and pulling, must adhere to proper manual handling principles. Acacium Group provides information, instruction, and training regarding this. Refer also to the Acacium Group CLIN 18 Manual Handling Policy.

Risk assessment and planning are essential in manual handling, and Acacium Group employees are expected to contribute to these processes. Assessments should consider the client(s) requiring movement, the load, the individual(s) performing the manual handling, or a combination of these factors. If significant risks are identified, an action plan may be developed to reduce the likelihood of incidents or recurrence. The goal is to minimise the possibility of incidents to the lowest practical level.

Clinical and professional judgement must be used, and the following rules apply:

- Where able, clients (as in patients) should be encouraged to move independently, with guidance from Acacium Group employees as required.
- Operations involving the manual lifting of clients, where reasonably practical, should be reduced by:
 - Encouraging clients, where able, to move independently.
 - Clients are being assessed for, and provided with, mobility aids and taught the correct use of the equipment.
 - Training Acacium Group employees in clinical contact with clients on proper handling techniques.
 - Ensuring that risk assessments are carried out and reviewed regularly or when there is a change in the client's level of mobility, or underlying health condition.
 - Making suitable equipment available to staff, and ensuring they are trained in correct checks and use of equipment.

Display Screen Equipment (DSE)

It is the responsibility of all employees to ensure that their workstations within their area of responsibility are designed for comfortable work. Employees should work with their line managers to ensure: -

- DSE assessments are conducted for new Acacium Group staff to decide workstation requirements, evaluate tasks, consider planned workload, and address individual needs.
- Arrange annual refresher DSE assessments and refresher training.
- Provide employees with information and instruction to set up effective working practices, reducing hazards and associated risks related to display screen equipment use.
- Organise free eye tests for defined users (if assessments specify a need for computer-use glasses, Acacium Group will contribute towards the cost).

Driver and Road Safety

Several measures are outlined in the Employee Handbook to maximise the safety of employees driving for company purposes. Employees making long journeys can take breaks and cook overnight stays where necessary. Journey schedules must allow sufficient time and should consider weather, traffic conditions, and speed limits.

Furthermore, car drivers must adhere to road safety regulations, including abstaining from alcohol/drug use and not using handheld mobile phones. Drivers must always have proper control of their vehicles. Driving while using a handheld mobile phone is an offence that could lead to prosecution, and Acacium Group discourages such behaviour.

Following the Department for Transport guidance, hands-free equipment must be provided with a voicemail or call-divert facilities when contact with an employee is necessary while driving. are encouraged to stop in a safe location, check for messages, and then return calls. Acacium Group discourages employees from taking calls whilst driving

Regular checks will be carried out on employee driving licences, MOT certificates, insurance, and servicing records.

First Aid

The Line Manager / appropriate other is responsible for arranging first aid coverage within their area. Trained Emergency First Aiders are available at low-risk office locations. First aid kits are provided at each site, and first aiders ensure regular checks and restocking. Where needed, the Line Manager / appropriate other is responsible for organising a first aid kit for their department: kit locations and owner contact details are on the notice boards controlled by Acacium Group in each location.

Work-Related Ill Health

New employees receive a pre-employment health questionnaire as the Equality Act 2010 requires. The employee is responsible for making Acacium Group aware of any existing health conditions. Acacium Group will organise continued health surveillance during employment if necessary. All employees must report any illness or injury affecting work to their Line Manager / appropriate other.

Fire Safety

The following general fire arrangements are in place:

- Conducting a Fire Risk Assessment for each area controlled or occupied by Acacium Group.

- A competent member of the UK Facilities Team ~~UK Facilities Manager Assistant~~ completes the Fire Risk Assessment
- Recording the assessment findings on the central Datix system and assigning them to the relevant parties who:
 - Function as required to remove or control risks.
 - Assume responsibility for ensuring that these actions are completed.
 - Check that the implemented measures have removed or reduced the risks.
- The central Datix system will update Chief People Officer and the Clinical Director when appropriate actions have been completed and the risk removed.
- Annual review of Fire Risk Assessments, or sooner for significant changes.
- There are trained fire marshals/wardens in all offices and premises occupied by Acacium Group.

Fire procedures are in place for all Acacium Group buildings. Where there is shared occupancy in buildings, the landlord is responsible for the fire evacuation drills and there is cooperation and coordination with the landlord, and other occupiers, resulting in an agreed standard procedure. It is the responsibility of the Line Manager / appropriate other to ensure all employees are aware of the procedure to follow in the event of a fire. Where Acacium Group employees work at another employer's premises or within a private dwelling, they must be made aware of the procedures they must follow. Where we own or are the sole occupier of a property the local Fire Wardens are responsible for the fire evacuation drills and weekly fire alarm tests.

Contractor Control Arrangements

When contractors are engaged for minor work on Acacium Group premises, they must adhere to Acacium Group's contractor work requirements and local rules established by the premises' landlord or managing agent.

For larger projects or major construction works compliance with the Construction (Design and Management) Regulations 2015 (CDM) is mandatory. This encompasses various alterations, maintenance, and repairs, including tasks such as decorating and rewiring.

Projects involving hazardous materials, building alterations, demolition, roof work, scaffolding, cranes, lifting equipment, or powered access equipment necessitate the engagement of external experts by Acacium Group to fulfil its CDM obligations.

For multi-contractor construction projects, Acacium Group will appoint a principal designer and principal contractor in writing before the construction phase begins. The principal designer must prepare a health and safety file containing essential information about the completed works for use during future construction.

Pre-construction information will be provided per regulations. The contractor must furnish a construction phase plan, a risk assessment and method statement for works beyond minor repairs.

Work equipment that generates electromagnetic fields (primarily in hospital settings) requires a risk assessment. Management of electromagnetic fields falls under the purview of NHS Trusts or relevant employers. Concerns about electromagnetic fields should be reported to their incidents and complaints teams within Acacium Group.

All contractors will be managed by the property and facilities team.

Incident Management

Incidents, including accidents and near misses, affecting employees, clients, visitors, contractors, and property must be reported promptly for investigation. All incidents are recorded in DATIX as per the Incidents Reporting Policy. The Clinical Director informs the enforcing authority (HSE) of accidents or major incidents under the Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013.

Incidents require investigation per the Acacium Group ORG 04 Incidents Reporting Policy, and the Line Manager / appropriate other assumes responsibility for completing this. The level of detail required will depend upon the severity of the incident, i.e., the more significant the severity, the greater the time allocated to the investigation. The investigation report should outline root causes and short/long-term action plans. All incidents are documented in DATIX.

Communication and Training

Health and safety information is communicated to all employees through various means:

- Briefings/emails
- The intranet
- Annual mandatory eLearning
- Quarterly H&S Packs issued to Senior Management
- Notice boards placed in each managed workplace featuring:
 - The latest health and safety law poster
 - Employers' liability insurance details
 - Health and Safety Policy Statement
 - Emergency arrangements

Property and facilities or peoples team or their local representatives will ensure the notice boards remain current.

Competence for Tasks and Training

The primary step in creating a secure work environment at Acacium Group is ensuring that every employee has the proper training to deliver top-quality care and services. Annual mandatory online Health and Safety (H&S) training is given to all employees.

Training	Organised by
Training needs to be identified, arranged and monitored	Line Manager / appropriate other
On-job training	People Team / Quality and Compliance Departments
Specialist training for first aid and fire	Organised using external service providers

Given the diverse training requirements, a comprehensive training policy is in place.

Employee Consultation

A dedicated office representative meets with the UK Facilities Manager quarterly to discuss health and safety matters for their respective sites. Acacium Group also operates an 'open door' policy encouraging employees to engage with their Line Managers for issue resolution, so any health and safety issues that the employee cannot resolve may be escalated.

Implementation Plan

For drafting, revising, and approval of policies and Standard Operating Procedures (SOPs), and for group-wide policy consultation, communication, and dissemination, refer to CORP 10 Policy on Policies.

Distribution and Communication

The policy undergoes annual review and is shared across the Group through the intranet and yearly online training. Health, safety, and risk are consistent topics in agendas in Quality & Safety, Board, and executive team meetings, including Business Reviews.

Audit and monitoring

The Clinical Director oversees compliance with this Policy. Regular internal and external inspections are conducted to assess standards, pinpoint issues, and manage risks proactively, preventing incidents.

A dedicated office representative performs quarterly inspections at each premises, followed by reviews during corresponding meetings. Any identified issues are managed following the incident reporting process, with assigned actions tracked to completion. Internal health and safety audits align with the quarterly inspections and are carried out in collaboration with the UK Facilities Manager. All documented issues and incidents are recorded in the Datix system, where actions are assigned and monitored until resolved. Ongoing employee engagement surveys conducted by Acacium Group help identify, evaluate, and resolve health and safety standards and concerns.

APPENDIX B | United States

General Safety Rules

Purpose

To minimise loss and establish minimum guidelines for working safely.

Scope

This Guideline applies to all employees based in the USA. Each employee's responsible for using these and all accepted standards of loss control.

Procedure

- a. Whenever an employee is involved in an accident that results in personal injury or property damage, no matter how small, the accident must be reported within 24 hours of when it occurred. The employee's ability to claim workers' compensation benefits may be affected if a work-related injury is not reported timely.
- b. Employees must immediately report a condition or practice they believe may cause injury or property damage.
- c. Equipment that is not in safe condition should not be operated.
- d. Employees must obey all company rules, governmental regulations, signs, markings, and instructions.
- e. Employees should use the approved lifting technique, i.e., bend their knees, grasp the load firmly, and the raise load while keeping their backs as straight as possible. Employees should seek assistance for heavy loads.
- f. Employees should be courteous and avoid distracting others. Acacium Group strives to provide a hazard-free work environment regardless of the source of the hazard, up to and including "horseplay"/practical jokes. Those found to have contributed to any adverse consequences resulting from these types of activities will be subject to disciplinary action.

- g. Employees should use the right tools and equipment for the job. They should be used safely and only when authorised.
- h. Each employee is responsible for maintaining a clean and orderly work area. All aisles, walkways, and hallways should be kept clear of clutter.
- i. Employees should be familiar with their office environment and know where all exits are located. Escape routes should be planned in case of an emergency. (Please refer to the Emergency Management Manual).
- j. The use of drugs or intoxicating beverages is strictly prohibited/restricted. (Also, see Substance Abuse Policy).

APPENDIX C | Australia

As a provider of on-hire services, the company is committed to effective consultation and engagement with workers on work health and safety matters. We recognise that we share a primary duty of care with host organisations regarding our on-hire workers. Therefore, we are committed to consulting, cooperating and coordinating activities with hosts to produce the required health and safety outcomes.

Responsibilities

The company is responsible for, as far as reasonably practicable:

- Effective implementation of the Work Health and Safety Management System (WHSMS) driven by senior management.
- Providing the appropriate level of resources to the WHSMS.
- Defining and communicating the key WHS management system responsibilities to the relevant personnel.
- Maintaining effective communication and consultation including horizontal engagement with key stakeholders on health and safety matters.
- Ensuring systems are in place to allow for the identification and resolution of work health and safety issues.

Consultants

Consultants will carry out WHS inspections at sites before casuals start work. Where this is impossible, an inspection must be completed within a month or have a copy of the client's WHS inspection.

- All Childcare workers must hold a current Working with Children Check (WWCC) and relevant qualifications.
- All Childcare workers are inducted at the start of each shift at each Centre by the relevant staff member within the client setting.
- All Healthcare workers must hold annual certificates in Manual Handling and First Aid.
- All Healthcare workers are inducted at the start of each shift at each facility by the relevant staff member within the client setting.

Operational workers

Operational workers and on-hire workers are responsible for the following:

- Adhering to all work health and safety policies and procedures.
- Ensuring their own and others' health and safety are not affected by their actions.
- Working with hosts and business partners to achieve the objectives outlined in this policy; and
- Reporting all incidents including unsafe work practices, hazards, near misses and injuries.

Management

Promoting and maintaining work health and safety is primarily the responsibility of management. Management at all levels is required to contribute to the health and safety of all persons in the workplace. To this end, it is the management's responsibility to

develop, implement and keep the organisation's WHS Program under review under consultation with its employees.

Managers, Supervisors and Team Leaders

These roles are responsible for implementing Australia's WH&S policy within their work areas and teams, and they are accountable for the following:

- Taking all practical steps to ensure that their work areas are safe and without health risks and that their work teams behave safely and do not cause health risks.
- Detecting any unsafe or unhealthy conditions or behaviours.
- Communicating all workplace safety incidents or risks to the WHS Representative or senior management team immediately.

Workers

Workers are responsible for cooperating and complying with Pulse Staffing Australia's WH&S policy to ensure their health and safety and the health and safety of others within the workplace. Specifically, employee responsibilities include:

- Taking reasonable care at work to prevent work-related illness or injury to themselves.
- Taking reasonable care at work to prevent work-related illness or injury to others.
- Notifying managers and WH&S Representative/ Manager of any incident or risk as soon as possible.
- Actively cooperating in any project specifying modified duties or suitable alternative duties when these are recommended as part of the recovery process.
- Cooperating with workplace changes designed to assist the rehabilitation of colleagues.
- Actively supporting the principles and procedures of Pulse Staffing Australia's rehabilitation policy and program.
- Accepting rehabilitation in any job classification as requested (subject to the feasibility of the pre-injury position and that the work offered is similar, attracts comparable status and pay and that the employee is qualified and capable of doing it).
- Informing their employer of any workplace hazards of which they are aware, including bullying.
- Complying with any bullying prevention procedures that are implemented in the workplace.

Contractors

All contractors and sub-contractors engaged to perform work on Pulse Staffing Australia premises are responsible for cooperating and complying with Pulse Staffing Australia's WH&S policy to ensure their health and safety and the health and safety of others within the workplace.

Consultation & WH&S Representative

Consultation is encouraged because staff participation and their input improve the decision-making process concerning health and safety concerns. Employees are encouraged to raise WHS issues directly with their supervisors or the WHS representative. Pulse Staffing Australia has appointed a WH&S representative responsible for consulting and raising specific health and safety issues concerning the employees in their workgroup, with management.

Staff Training

We will ensure that the business financially funds the necessary time and formal training for all employees who voluntarily undertake a specific WHS role in line with legislative requirements. These roles include:

- Floor Warden
- Warden
- First Aiders
- WHS Representative

Hazard and Safe Work Practices

The most common injuries sustained by office workers are those caused by falls, trips, collisions, being struck by objects and handling heavy articles.

Slips, Trips and Falls

How you move about the office can affect your safety and fellow office workers. Watch where you are going and take your time where required. Accidental falls frequently occur when personnel run along corridors or hurry up or down stairs. Especially those containing blind bends. Traffic ways and aisles should be clear of materials, equipment, rubbish and electrical leads. Spilt liquids and anything else dropped or broken on the floors should be immediately picked up or cleaned. If a liquid is greasy, ensure a suitable cleaning agent is used. After cleaning, the floor may be wet for some time so ensure you use appropriate signs to tell people the floor is still wet.

Filing Cabinets & Storage Space

Accidents may occur when overloaded top drawers of vertical filing cabinets pull the cabinet forward onto the unsuspecting team member or left-open lower drawers can lead to the stubbing of toes and smashing shins. For stability, load cabinets starting from the bottom and do not open more than one drawer at a time. Filing cabinets, shelves and bookcases should be easy to access and bulky or heavy items placed at a comfortable height. Additionally keep aisles, walkways and stairs clear of obstacles. Do not store boxes, equipment or rubbish in such areas. Shut cupboard doors and drawers immediately after use. To the unaware, these can be dangerous obstacles. Review your storage facilities regularly to minimise hazards.

Clear Desks

At the end of the day or during extended periods of absence away from your desk during the day, to maintain office appearance and reduce the risk of confidentiality being breached you are expected to:

- Put away all paperwork.
- Secure laptop computers or other expensive equipment in a locked drawer or cupboard.
- Either log out of your computer or ensure that you have a password-protected screen saver on your computer.

Electrical Hazards

Carry out visual inspections of plugs and leads in your area. Faults to look out for include physical damage to the cable, failure of the cord grip and signs of overheating. If defects are found, inform your manager immediately. Do not ignore obvious telltale signs such as

faulty switching or intermittent stopping. These may indicate an internal fault such as a loose wire, which could cause external metalwork to become live. Remember to switch off equipment before unplugging and before cleaning.

Equipment Safety

When operating items of office equipment make sure you follow the manufacturer's instructions closely. If a fault occurs, do not try to fix it yourself, get the problem attended to by a trained professional. Ensure office equipment areas are kept well-ventilated. Equipment must be positioned to avoid cables crossing pedestrian routes and use covers to fix them to surfaces securely. Ensure office furniture is in good working order and suitably placed within the office not to cause harm or act as a hazard. In training rooms, ensure portable flipcharts are correctly erected. Stand clear of machinery such as shredders when in use.

Kitchens

- If you spill something, clear it up immediately.
- Always wipe surfaces clean after use.
- Any sharp objects should be wrapped in newspaper and disposed of carefully.
- Be careful not to scald yourself when using the hot water tap.
- Use a trolley to move heavy equipment, furniture or boxes.

Drugs and Alcohol

We provide a work environment that aims to ensure all employees' health, safety, respect and productivity. The use of drugs and alcohol in the workplace or at client sites is prohibited as it can create a range of serious problems including injury to the impaired employee and others and damage to their physical and mental health. Drug and alcohol use in the workplace is covered by the Workplace Health and Safety Act 2011

Employers ensure the health, safety and welfare of all their employees when at work and any others visiting or working in their places of work.

Employers take all practical measures to protect workers concerning health, safety and welfare.

Employees take reasonable care for the health and safety of persons that may be affected by their acts.

No employee is to commence work or return to work while under the influence of alcohol or drugs. The purpose of this policy is to maintain a work environment that is free from the effects of drug and alcohol use.

Prescription Drugs

If you take prescription drugs, please check with your doctor to establish if the drug's use will impact your work performance.

Smoking

Our offices are smoke-free; you are not permitted to smoke anywhere inside our buildings or other identified areas within the immediate vicinity. This policy extends to clients, contractors and other visitors to our premises.

When travelling on company business, staff must also comply with this policy, this includes but is not limited to travelling in vehicles and attending meetings on company business (such as at client or supplier sites).

Workplace Injuries or Incidents

Dealing with Workplace Injuries

Where there is an injury at work, the injured worker must be provided with:

- First aid.
- Transport to medical treatment.
- The name of the employee's insurer.
- The employer's name (business name) and contact details.
- A claim form, if requested by the worker.
- Suitable duties.
- Any assistance that will help the worker recover and return to work quickly.

Notify the insurer within 48 hours and provide the insurer with the following:

- A date and description of injury, and details of how it happened.
- The name, address and date of birth of the injured worker.
- The name and address of the company.
- The name of the treating doctor, or name of the hospital (if the worker is hospitalised).
- The name and contact details of the person making the initial notification, and their relationship to the worker or employer.

Forward to the insurer:

- A Work Cover medical certificate, if provided by the injured worker, within seven days
- Ongoing medical certificates, receipts and accounts for medical or other treatment, within seven days.

Incident and Injury Register

We keep a register of injuries and first aid treatment provided. All accidents and injuries must be recorded in this register no matter how minor. The injuries register records:

- The name, age, address and occupation of injured workers.
- The industry in which workers were working at the time of injury.
- The operation in which workers were engaged at the time of injury.
- The date and time the injury occurred.
- Briefly describe the type, cause and location of injuries and any treatment received.
- The name of the first-aid person in attendance.
- Any referral for further treatment (if required).

Injury and Incident Investigation

Where an injury or incident occurs, we will investigate the nature of the incident and the circumstances which lead to the incident. A management team member coordinates this in consultation with the WHS Representative, the injured party (where possible), the injured party's direct supervisor or manager, and any witnesses present.

All investigation findings are reported to the Responsible Officer (Pulse Staffing Australia General Manager) and where necessary the relevant authorities.

Fire Safety

Fire Equipment

All premises follow WHS legislative requirements relative to the fit-out of each location which may include but is not limited to smoke and thermal detectors, extinguishers, fire hose and reels, sprinkler systems, fire blankets, emergency exit signs and evacuation stairs. We train all fire wardens on how to use any necessary equipment.

Fire Doors

Fire doors are designed to contain fires in the specific area and to stop smoke from spreading. So that they are effective fire doors should always be kept closed and employees must ensure that furniture, boxes or objects do not obstruct the fire escape path. If a fire door feels hot, do not attempt to open it, there may be fire on the other side.

Evacuation

The fire alarm is a two-stage system. In the event the evacuation alarm sounds, listen to the type of sound to determine the best course of action:

- **Intermittent (Single Tone)** | There is no immediate cause for alarm. Please be sure to take note of the instructions from your wardens.
- **Continuous (Two Tone)** | Follow your site evacuation procedure. Wardens will evacuate all staff from the floor immediately via the emergency stairs. Only take personal possessions with you if time allows and it is safe to do.

APPENDIX D | Other International Locations

Japan

Legislation information is available at the Japanese International Centre for Occupational Health and Safety.

<https://www.jniosh.johas.go.jp/icpro/jicosh-old/english/topics/OSHLegislation.html>

China

Information and recommendations can be found on the International Labour Organization website.

https://www.ilo.org/dyn/legosh/en/f?p=14100:1100:0::NO::P1100_ISO_CODE3,P1100_YEAR:CHN,2013#

Germany

The Federal Ministry of Labour and Social Affairs administers Occupational Health and Safety legislation. BMAS is responsible for health and safety at the Federal level.

<https://www.bmas.de/EN/Labour/Occupational-Safety-and-Health/occupational-safety-and-health-art.html>

Singapore

Information on Health and Safety can be found on the Ministry of Manpower website.

<https://www.mom.gov.sg/workplace-safety-and-health/workplace-safety-and-health-act>

Switzerland

Health and Safety information can be found at

https://www.ilo.org/dyn/legosh/en/f?p=14100:1100:0::NO:1100:P1100_ISO_CODE3,P1100_YEAR:CHE,2013:NO

Acacium Brands

This policy applies to the following brands, all which form part of Acacium Group

1. A&E Agency
2. Maxxima

- | | |
|---------------------------------|-----------------------------------|
| 3. Thornbury Nursing Services | 15. Xyla Health & Wellbeing |
| 4. General Medicine Group | 16. Xyla Health & Social Services |
| 5. Liquid Personnel | 17. Espirita |
| 6. Pathology Group | 18. Bank Partners |
| 7. Scottish Nursing Guild | 19. Proclinical |
| 8. Thornbury Community Services | 20. Hobson Prior |
| 9. GP World | 21. R&D Partners |
| 10. Pulse | 22. Dunn Regulatory Associates |
| 11. Pulse Healthcare | 23. Favorite Healthcare Staffing |
| 12. CHS Healthcare | 24. Sanctuary Recruitment |
| 13. Xyla Digital Therapies | 25. Ellea Nursing |
| 14. Xyla Elective Care | 26. SUMO Medical Staffing |

Document Control Log

Category	Policy Details
Policy Name	HEALTH AND SAFETY POLICY
Purpose of Document	To set out Acacium Group's health and safety management approach and outline health and safety arrangements within the organisation.
Target Audience	All Acacium Group workers
Version	V6
Author	Karen Matthews-Shard
Date of Approval	May 2012
Published Date	May 2012
Lead Director	Sara Andrews
Review Frequency	Annually
Last Reviewed	October 2023
Next Review Date	October 2024
Risk and Resource Implications	Training
Equality Impact Assessment (EIA)	EIA completed by the author of this Policy and reviewed at the time of any amendments. The People Team can supply copies of this upon request.
About Acacium Group	Details of all Acacium Group trading companies that this policy applies to are detailed within this section (Appendix E)
Legislation	Legislation and guidance pertinent to this policy can be found in Appendix E.

Document Control History

Earlier document history is available upon request.

Version	Date	Changes Made	Reviewer Name(s)
V3.2	Jan 2019	Annual review and update from Quadriga	KMS/SJ
V3.3	Apr 2019	Implementation of New Policy Template	CCR/KG
V3.4	Dec 2019	Update to brand information	KG
V3.5	Jan 2020	Revision of Policy to include Health and Safety Champions	SOH (Quadriga)
V3.6	Mar 2020	Implementation of new policy template	CC
V3.7	Jul 2020	Updated code from ORG 03 to CORP12	CC
V3.8	Aug 2020	Reversed back to ORG 03 as per KMS	CC
V3.9	Oct 2020	Updated to Acacium Group Rebrand	CC
V3.10	Jan 2021	Annual Review	Clinical Advisory Group
V3.11	Jan 2021	Rebrand 2	CC
Draft v4	Jun 2021	Updated	AM, AH, LD
V5	July 2022	Reviewed and updated	AH & PB
V6	October 2023	Implementation of new global policy format	LD