



'not just what to do, but more importantly how to do it.'

Agency Management Policy

COMPANY

This Policy is not intended to act as or replace existing operational procedures.

Unique ID:	Agency Management Policy
Version:	Approved by: Shayne Tyler
Review Date:	INSERT DATE
Author (s):	INSERT NAME
Final Date of Approval:	INSERT DATE
Date added to Intranet:	INSERT DATE

Policy Statement

The COMPANY Ltd (the Group) is committed to providing a safe and healthy working environment for its employees and persons affected by its operations or activities and understands the importance of this to both employees and other stakeholders.

The Group accepts its responsibilities under the Health & Safety at Work etc. Act 1974 (herein known as the Act) and all other regulations under the Act. As such, requirements of the Act will be regarded by management and staff as being of primary importance. The Group provides information, instruction and training to ensure employee competence and an understanding of roles and responsibilities.

The Group structure is made up of wholly owned and Joint Venture businesses that have direct management and control of all activities undertaken on each site. They are subsequently delegated the responsibility to manage all of the Health, Safety and Welfare associated with these activities for the protection of their employees, visitors, stakeholders and contractors.

The Group is committed to pro-active management of health & safety and to ensure continual improvement and development in site performance. As such the Group has a risk management programme, which issues Group policies and continually assesses the processes and procedures on sites that ensure hazard identification and corrective actions are identified and implemented. This includes health and wellbeing issues and emergency planning.

Scope

This policy applies to all who attend COMPANY sites¹, staff, and contractors.

This policy will cover all risks that arise relating to isolation and permit to work activities on a COMAPNY Site.

This policy will cover how workplace isolation and permit to work risks on COMPANY sites are assessed, controls monitored and reviewed in order to protect staff and others in order to comply with the relevant regulations, attain best practice and maintain continuous improvement.

This Policy should also be read in conjunction with site specific policies and procedures.

¹ COMPANY Site / COMPANY Businesses / COMPANY Sites or any other term relating to COMPANY for clarity- includes all businesses and Joint Ventures where COMPANY has any level of Health and Safety legal responsibility.

Minimum Implementation for COMPANY Sites

1. The site competent person has identified the employees in his or her area to whom the policy applies and has given the policy (or selected excerpts) to them.
2. The site designated competent person has assessed the impact of the policy on current working practices and has an action plan to make all necessary changes to ensure that his or her area complies with the policy.
3. The site designated competent person has set up systems to provide assurance to him or her that the policy is being implemented as intended in his or her area of responsibility.

Agency Management

As most of the agency used are migrant workers this policy should be used in conjunction with the COMPANY Migrant Worker Policy.

All agency used **MUST** be registered with the Gangmasters and Labour Abuse Authority and subject to two audits by competent people from the COMPANY business per annum.

The audits need to monitor and maintain the following standards.

- Fit & Proper – *to ensure competent leadership of the labour provider*
- PAYE, VAT – *to ensure compliance to Agency worker directive and colleagues are not being exploited.*
- Debt Bondage – *to ensure staff are free from exploitation*
- Accommodation – *to ensure provided accommodation is compliant with legal standards*
- Working Hours – *to ensure compliance with EU 48 opt out rules, the Working Time Directive and ETI standards of 60 hours rules*
- Recruitment & Contracts – *to ensure compliance to legal standards and employer pays principles.*
- Subcontracting – *is not permitted*
- ID and Age – *prevention of child labour and worker substitution.*
- Right to work – *prevention of illegal working*
- H&S
 - LU/LP co-operation Responsibilities
 - LU/LP Co-operation training
 - Risk assessments
 - No charges for H&S
 - Safe working conditions
 - Suitable PPE and welfare conditions
 - Workplace Transport
 - LP transport provision

All COMPANY businesses must have a working document in place that outlines the practical terms and conditions through a **service level agreement (SLA)**. This agreement must include;

- Compliant and in agreement with employer pays principle
- Compliant and in agreement with ETI standard 3 regarding debt bondage & harsh treatment.
- Suitable provision for fair warning and notification for work and cancellation of work. Workers are also entitled to a minimum of 4 working hours if booked.
- Compliance, agreement and suitable systems to prevent illegal working and exploitation.
- Compliance and in agreement for suitable Health, safety, welfare and hygiene standards for;
 - Worker supervision
 - H&S leadership
 - Communications of site rules and company handbook
 - Inductions

Organisational Roles and Responsibilities

Group

While it is accepted that the primary responsibility rests with the Executive Directors of the Group, the implementation of the day-to-day operation of the policy is delegated to line managers.

- **Group Chief Executive** - Overall responsibility for health & safety at COMPANY by ensuring that appropriate health & safety policies and procedures are in place.
- **Other board directors** have collective and individual responsibility for health and safety.
Essential principles include;
 - visible, active commitment from the board
 - establishing effective 'downward' communication systems and management structures
 - integration of good health and safety management with business decisions
- **Group Compliance Director (Non board)** – is responsible for the delegation of Group policies and management of site compliance.
- **Employees** - Adhering to health & safety procedures / rules and for taking reasonable care for themselves and others.

Sites

Full delegated responsibility is discharged to Site Managing Directors for the deployment of COMPANY policy within their business.

Ensuring a safe working environment and all health & safety policies and procedures are in place. Specifically;

- **Site Managing Directors –**

The Managing Director is responsible for the overall arrangements and for ensuring that the company's operations are executed at all times in such a manner as to ensure, so far as is reasonably practicable, the health, safety and welfare of all employees and others who may be affected by its operations.

In particular the Managing Director will:

1. Ensure there is an effective company policy for health and safety and that all employees, contractors and temporary workers are made aware of their individual responsibility.
2. To understand and ensure, through the appointment of competent persons, that the company's responsibilities as employers under the Health and Safety at Work etc. Act 1974 and any relevant Acts of Parliament and Statutory Instruments are met.
3. To appoint competent persons responsible for safety.
4. To ensure that all Directors and Managers understand and fulfill their responsibilities with regard to health and safety.
5. Arrange for funds and facilities to meet the requirements of company policy and legislation.
6. Make provision for adequate and appropriate training to be given to all employees.

7. To ensure that notification and reporting procedures to the relevant statutory authorities are carried out.
 8. Set a personal example on all matters of health and safety.
- **Managers** - Implementing and ensuring adherence to health & safety and risk assessment policies and procedures.
 - **Health & Safety Committee** - Planning, developing and introducing policies and guidelines, review performance, risks and liabilities and to ensure a consistent high standard across the business and to report activity to Group for review. Providing a forum for monitoring risks and performance and for implementing health & safety policies and local procedures. Also used as a means of communicating and consulting with employees and on matters that may affect their safety.

Employees

All employees are responsible for:

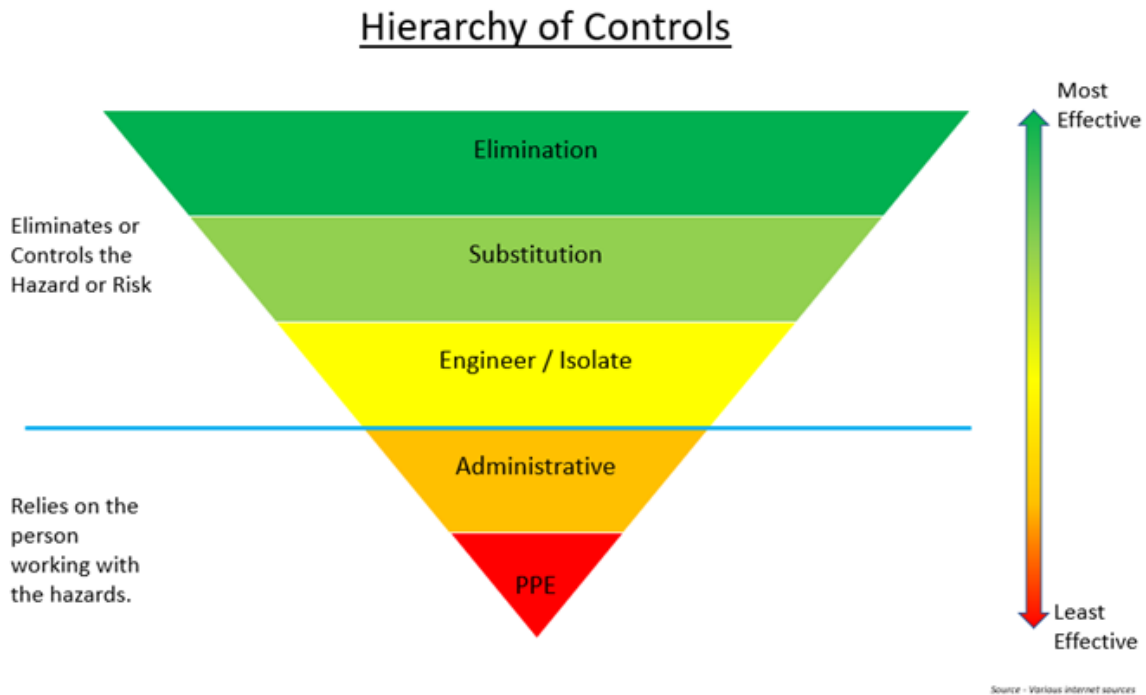
- taking reasonable care of themselves and any other people who may be affected by their actions;
- co-operating by following policies, procedures and protocols designed for safe working;
- reporting all accidents and incidents involving workplace transport to their manager;
- contributing to the risk assessment process and attending training designed to meet the requirements of this policy;
- reporting to their line manager any concerns they may have about potentially dangerous situations or tasks being carried out that relate to their work environment;
- compliance with a reasonable request to park safely or to move a vehicle in accordance with site rules and local traffic management procedures;
- compliance with site rules and local traffic management procedures which arise out of this policy.

Strategic Partners, Contractors and Suppliers

All strategic partners, visitors, contractors, suppliers and to COMPANY businesses are responsible for:

1. Taking reasonable care of themselves and any other people who may be affected by their actions;
2. Co-operating by following policies, procedures and protocols designed for safe working;
3. Reporting all incidents and accidents involving their vehicles to the manager from COMPANY sites who engaged them;
4. Reporting any dangers, they identify or any concerns they may have about potentially dangerous situations or tasks being carried out that relate to their work environment to the manager that engaged them;
5. Compliance with a reasonable request to park safely or to move a vehicle in accordance with the site rules and local traffic management procedures

In Health and Safety methodology is the concept of ‘Hierarchy of risk controls’ and it is the foundation of risk reduction for the health, safety and welfare of staff every day. This methodology is an essential and expected requirement for each site to demonstrate in their risk management processes.



It is a prioritised list of risk reduction where you manage the risk in the following prioritised order.

1. **Eliminate** – can you eliminate the risk from the person? if you cannot;
2. **Substitute** – can you substitute the identified risk with a smaller risk? if you cannot;
3. **Isolate** – can you isolate the person from the risk? If you cannot
4. **Administrate** – you need to administrate the risk with signs, training, and new procedures
5. **PPE** – and finally if you still identify a risk, you must consider, as a last resort, PPE

Control the risks

Look at what you're already doing, and the controls you already have in place. Ask yourself:

- Can I get rid of the hazard altogether?
- If not, how can I control the risks so that harm is unlikely?

If you need further controls, consider:

- redesigning the job
- replacing the materials, machinery or process
- organising your work to reduce exposure to the materials, machinery or process
- identifying and implementing practical measures needed to work safely
- providing personal protective equipment and making sure workers wear it

Record your findings

You must record your significant findings, including.

- the hazards (things that may cause harm)
- who might be harmed and how?
- what you are doing to control the risks

To help you, we have a [risk assessment template and examples](#). Do not rely purely on paperwork as your main priority should be to control the risks in practice.

Review the controls

You must review the controls you have put in place to make sure they are working. You should also review them if:

- they may no longer be effective
- there are changes in the workplace that could lead to new risks such as changes to:
 - staff
 - a process
 - the substances or equipment used

Also consider a review if your workers have spotted any problems or there have been any accidents or near misses.

Update your risk assessment record with any changes you make.

Signature Page

Group

Date

Date

Site Leadership team

Date

Date

Date
