



HEALTH AND SAFETY POLICY

A handwritten signature in blue ink, appearing to read "Jerry Froggett".

Jerry Froggett, Chief Executive Officer
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1 SCOPE OF POLICY

This policy applies to all Cintra employees, linguists, directors, volunteers and contractors, and all others working at or visiting Cintra's premises. Within Cintra's span of control this policy also applies to employees and linguists working at and travelling to and from our customers' premises, community locations or service users' homes.

Special provisions apply to Cintra's employees who work at home and at night and these are described in more detail in the Home and Night Worker Policy. Special provisions also apply to employees and linguists who become pregnant; these are covered in the Maternity Policy.

The following final action may be taken by Cintra against those who are found to be in breach of the policy.

- Employees - disciplinary action, including dismissal
- Linguists – de-registration from Cintra
- Contractors – termination of contract
- Directors – removal from Board

2 AIMS OF POLICY

- Provide adequate control of the health and safety risks arising from our work activities
- Maintain safe and healthy working conditions
- Provide and maintain safe plant and equipment
- Prevent accidents and cases of work-related ill-health
- Consult with our employees on matters affecting their health and safety
- Provide information, instruction and supervision for employees on health and safety matters.
- Ensure all employees are competent to do their tasks and to give them adequate training
- Ensure safe handling and use of substances

3 RESPONSIBILITIES

All employees, linguists, volunteers and contractors are responsible for:

- Co-operating with Cintra's managers on health and safety issues.
- Not interfering with anything provided to safeguard their health and safety.
- Taking reasonable care of health and safety, ensuring adherence to safeguards put in place by Cintra.

Linguists are expected to comply with the health and safety requirements of Cintra's customers whilst performing their duties for that customer.

Overall and final responsibility for health and safety is held by Cintra's Board of Directors.

Cintra's Chief Executive is responsible for ensuring that this policy is implemented and complies with legislation.

To ensure that health and safety standards are maintained and improved, other responsibilities are as follows:

Job Title	Responsibility
Human Resources Team	<ul style="list-style-type: none"> • Ensuring the policy complies with current legislation • Monitoring and reporting compliance with the Health and Safety policy • Ensuring the following are carried out at appropriate frequencies <ul style="list-style-type: none"> - organisation wide, COSHH and fire risk assessments - Portable Appliance and electrical testing - Display Screen Equipment, Home Worker and Night Worker assessments - first aid box contents checks • Ensuring maintenance of plant and equipment • Ensuring accidents and near misses are reported and investigated under RIDDOR • Health and safety information and training • Checking driving licences and vehicle insurances of linguists and employees as necessary • Ensuring that a risk assessment is carried out prior to a person under the age of 18 commencing work.
Head of Business Operations	<ul style="list-style-type: none"> • Promoting the health and safety of linguists while carrying out their duties • Ensuring risk assessments (including maternity risk assessments where applicable) are carried out for each face-to-face interpreting assignment and the linguist is briefed and consulted as necessary.
Line Manager	<ul style="list-style-type: none"> • Ensure their department and team members comply with the Health and Safety policy.
Staff Safety Representative	<ul style="list-style-type: none"> • To make management aware of concerns about possible risks and dangerous events in the workplace that may affect the health and safety of the employees he/she represents • To raise with management general matters affecting the health and safety of the employees he/she represents • To represent the employees who elected him/her in consultations and health and safety inspections.

Linguists are expected to comply with the health and safety requirements of Cintra's customers whilst performing their duties for that customer. Where the risk assessment has deemed the risk to be high, such as for invasive medical treatment, potential exposure to ionising or UV radiations, police raids or potentially violent service users, the linguist must agree risk control measures with the service provider before the assignment commences. At all times the linguist must follow the instructions of the service provider on health and safety issues. If at any time the linguist has concerns about health and safety they should suspend or withdraw from the assignment, discuss these directly with the service provider and inform Cintra's Bookings Team.

Employees or linguists who become pregnant must inform the Bookings Team at the earliest opportunity. This must be at least 15 weeks before the beginning of the week the baby is due.

Staff and volunteers should report all health and safety concerns to their departmental manager, the Human Resources Team, the Head of Business Operations or the Staff Safety Representative. Managers should take remedial action as appropriate and make the Human Resources Team aware.

The manager commissioning contractors should ensure that health and safety issues are discussed prior to the work taking place and that reporting mechanisms are established in case problems or concerns arise when work is in progress.

The Human Resources Team will ensure new staff, volunteers and office agency workers are given key health and safety information on their first day of work.

4 ARRANGEMENTS FOR PROMOTING HEALTH AND SAFETY

4.1 RISK ASSESSMENTS

The following risk assessments will be conducted regularly, when additional hazards or risks are reported or preceding a significant planned change:

- Organisation-wide
- Fire (internal inspection)
- Home Workers
- Control of Substances Hazardous to Health

An external fire risk assessment will be commissioned whenever there are significant changes of use of space within the office or alterations to the office.

Display screen equipment tests are carried out for all new employees, when duties or workstations change or if individual employees request them. All employees need to undertake at least one display screen equipment test.

Findings of risk assessments will be reported to the Head of Business Operations, who will approve any action plan to remove or control risks, monitor its implementation and check that risks have been removed or reduced.

Major findings and progress of action plans will be reported to the Board.

Maternity risk assessments will be conducted as necessary by the Human Resources Department, Bookings Manager or Head of Business Operations and full records made.

Risk assessments will be carried out by members of the Bookings Team for every face-to-face interpreting assignment, and any non-routine assessments will be recorded.

A young person's risk assessment must be carried out by the Line Manager before a person under the age of 18 commences work.

4.2 CONSULTATION WITH EMPLOYEES AND LINGUISTS

The workforce will be consulted when risk assessments are conducted and when reviewing health and safety arrangements. Consultation is carried out through staff meetings, individual consultation on specific issues and Linguist Support Meetings.

Elections for Staff Safety Representatives will be conducted every three years. The role is described in section 3 above. Representatives will be given reasonable time with pay where necessary to carry out their role and appropriate training, help, information and facilities.

4.3 INFORMATION, INSTRUCTION AND SUPERVISION

A Health and Safety Law poster is displayed at Cintra's premises. Health and safety advice is available from the Human Resources Department.

Cintra's Human Resources Team is responsible for ensuring that Cintra's employees and linguists are provided with relevant health and safety information and where appropriate, training, firstly as part of their induction and then on an ongoing basis to ensure that learning is kept up-to-date.

Clear and accessible health and safety information is given in the Employee and Linguist and Translator handbooks.

Health and safety training for Cintra's employees, linguists and translators is provided as a standard component of Cintra's induction training. Training focuses on:

- Their obligations under the health and safety policy
- Significant risks and risk assessment
- Strategies to reduce and manage risks

Regular health and safety briefings are given at training courses, staff meetings and Linguist Support Meetings.

The Human Resources team keeps records of any health and safety training undertaken.

Cintra's Head of Business Operations and HR Manager are responsible for ensuring that linguists working at customers' locations are given specific health and safety information relevant to each assignment that they undertake.

4.4 ORGANISATIONS USING CINTRA'S LINGUISTS

As Cintra's linguists work at the premises of public service or commercial organisations, and community locations where their services are provided, Cintra aims to ensure that:

- These organisations have sound health and safety policies.
- Health and Safety policies, arrangements and risk assessments are provided for Cintra in order that Cintra can inform its linguists and can review its own risk assessments as appropriate.

- Robust arrangements are in place to ensure that Cintra receives information related to the specific health and safety risks of any individual booking.
- These organisations have procedures in place to ensure the health and safety of Cintra's linguists whilst working on their premises and under their direction and control and that members of staff who book Cintra's linguists give adequate health and safety briefings to all linguists on their arrival at appointments.
- Cintra's health and safety policies, procedures and arrangements are effectively communicated to all organisations which use Cintra's linguists.

It is the responsibility of Cintra's Chief Executive to ensure that all such arrangements and information are in place and acted upon and to ensure that Cintra does not book linguists for any customer until all the above requirements have been satisfied. The issues listed above are covered by service level agreements with Cintra's contracted clients. It is difficult to do this with ad hoc clients.

4.5 SAFE PLANT AND EQUIPMENT

The Human Resources Team is responsible for ensuring that Cintra's plant equipment used at Cintra's premises and in Home Workers' homes is safe and adequately maintained.

The Head of Business Operations checks that new plant and equipment meets health and safety standards before it is purchased.

Any person who has concerns about an item of Cintra's plant or equipment should report their concerns to the Human Resources Team as soon as possible.

Portable Appliance Testing will be carried out annually. This includes employee's personal equipment used at Cintra's premises such as mobile phone chargers.

The Human Resources team is responsible for identifying all equipment and plant needing maintenance, ensuring effective maintenance procedures are drawn up and maintenance implemented. For example, fire alarms, fire extinguishers, heating system, electrical system and security system. A record is kept of inspections, maintenance carried out, certifications and contractor invoices.

4.6 ROAD SAFETY

Cintra's linguists undertake significant amounts of road travel for their work.

The Human Resources Team is responsible for ensuring that relevant personnel receive information on:

- Safe driving
- Driving and appointments at night
- Safe use of mobile phones while driving – Cintra requires that staff and linguists do not use mobile phones whilst driving if they do not have hands-free telephony facilities within their vehicle.

Cintra's Head of Business Operations is responsible for ensuring that bookings are safely spaced to allow linguists to reach appointments while driving safely within speed limits, that appointment lengths are not excessive, that specific arrangements are made in case of hazardous driving conditions and that controls are in place for service

providers to report if linguists have not arrived at the appointed time for appointments. He/she is also responsible for ensuring that journeys are minimised through careful selection of the most logical linguist for each appointment.

4.7.1 WORKING HOURS AND PATTERNS

Cintra expects linguists to take reasonable breaks during an assignment in order to maintain their concentration and to ensure adequate rest and safe travel. Where appropriate the Bookings Co-ordinator will assist the linguist in making specific arrangements, such as providing information about hotels or public transport if an assignment runs longer than expected.

Cintra will ensure that the Cintra working hours and patterns of linguists who can be defined as agency workers under the Working Time Regulations (i.e. payroll workers) comply with the Working Time Directive, unless waiver agreements have been made (not those who are self-employed, are sub-contractors or are sole traders).

The Line Manager is responsible for ensuring that employees' working hours and patterns comply with the Working Time Directive, unless waiver agreements have been made. There is a separate Employee Home and Night Workers Policy which covers how the Working Time Directive impacts upon Cintra's home and night workers.

4.8 WORK-RELATED STRESS

Cintra has specific arrangements in place to control risks of work-related stress. Linguists may be subject to stress due to the sometimes traumatic subjects they encounter during interpreting sessions and the isolated nature of the profession. It is the responsibility of the Human Resources team to ensure that the following facilities are available to linguists and that their availability is effectively communicated:

- 24/7 access to Bookings Co-ordinator and Duty Manager. Telephone access to Head of Business Operations, Chief Executive or Head of HR.
- Information and training related to stress.
- Linguist support meetings.
- Support and counselling facilities.

The Head of Business Operations and HR Manager are responsible for ensuring that organisations which use Cintra's linguists do not require excessive working hours without mandatory breaks and that specific arrangements are made if necessary for rest.

It is the responsibility of Cintra's Chief Executive to ensure that all agreed actions are taken to control the risks of work-related stress for office-based employees, including clear allocation of roles and responsibilities and workload, and provision of appropriate rest breaks. All employees have access to counselling facilities.

4.9 VIOLENCE

Cintra has specific arrangements in place to control the risks of violence towards linguists, as follows:

- Linguists' personal details are not given to third parties without their permission, unless in the event that such disclosure is, in Cintra's view, required for the proper conduct of Cintra Ltd's business.
- Linguists are instructed not to develop personal relationships with clients and, where possible, do not perform bookings for clients who are known to them in a personal capacity
- Linguists are instructed not to meet service users on their own without the service provider, or to enter service users' houses on their own without the service provider.
- Organisations which use Cintra's linguists are asked for specific details of any known risk of violence related to any appointment for which a Cintra linguist is booked.
- Risk assessments are carried out for assignments that do not take place on the site of the organisation booking the linguist.
- Cintra passes on specific information to all linguists, prior to their accepting a booking, related to the known risks.

The Chief Executive is responsible for ensuring that organisations which use Cintra's linguists are aware of and apply these procedures and controls.

The Human Resources team is responsible for ensuring that these risks and the controls that linguists must put in place to mitigate them are effectively communicated to all linguists through induction training, the Linguists' and Translators' Handbook and follow-up training and that all incidents are thoroughly investigated and the conclusions reported.

4.10 DISPLAY SCREEN EQUIPMENT

Where employees habitually use display screen equipment as a significant part of their work, Cintra will regularly review workstations and work routines. The Human Resources Department will provide information and training to workers and will ensure DSE assessments are conducted when appropriate. The Line Manager will make sure that each employee has adequate breaks/changes of activity.

For such employees, Cintra will refund on request the costs of eye and eyesight tests. Cintra will fund the cost of a basic frame and lenses if their optician judges and puts in writing that they require 'special spectacles (for example, prescribed for the distance at which the screen is viewed) and normal ones cannot be used' i.e. they need spectacles specifically for VDU work.

Cintra has no legal obligation to fund eye tests or spectacles for self-employed workers and is not responsible for providing breaks.

4.11 SMOKING

Smoking is prohibited in Cintra's buildings and company vehicles. The aim is to protect all workers and visitors to Cintra's premises from exposure to second hand smoke and to assist compliance with the Health Act 2006. Exposure to second hand smoke increases the risk of lung cancer, heart disease and other serious illnesses. Ventilation

or separating smokers and non-smokers within the same airspace does not completely stop potentially dangerous exposure. Cintra's work places should be smoke-free, and all employees have a right to work in a smoke-free environment.

Line managers are responsible for monitoring compliance.

The Human Resources Department can provide information should an individual wish to give up smoking. The NHS offers a range of free services to help smokers give up. Visit www.nhs.uk/smokefree for details or call the NHS Smoking Helpline.

Staff who leave their duties to smoke should do so as part of their normal breaks or make up the time spent away from work, at the discretion of their manager.

Those who contravene the smoke-free legislation may be liable to a fixed penalty fine and possible criminal prosecution.

4.12 PREMISES

Cintra will ensure that its premises:

- Are heated to at least the minimum temperature required by law.
- Have safe means of access and exit.
- Are safely laid out, with risks of slips and trips carefully controlled.

4.13 SAFE HANDLING AND USE OF SUBSTANCES

a) Cintra's premises

Cintra's Human Resources team is responsible for ensuring:

- identification of all substances held at Cintra's premises which need Control of Substances Hazardous to Health (COSHH) assessment;
- undertaking COSHH assessments;
- ensuring that all relevant employees are informed about the COSHH assessments; and
- checking that new substances can be used safely before they are purchased.

The Chief Executive is responsible for all ensuring that all actions identified in the assessments are implemented.

The manager commissioning contractors should make the contractor aware of their responsibility to minimise the risk of Cintra's employees or visitors being exposed to hazardous substances being used by the contractor.

b) Work undertaken at service providers' premises

Linguists who are pregnant should inform Cintra as soon as practical and also inform the service user before the assignment commences.

Biological agents, medicines and other substances hazardous to health

Linguists should not touch any medical equipment, medical or body products, hazardous substances or patients (where there is a risk of infection/contamination through casual contact) in any service provider premises or community settings. During an assignment, linguists should position themselves where the risk of exposure to such substances is minimised and they should wear protective clothing as appropriate. They should ensure

they follow the service provider's instructions for hand washing etc. at the end of the assignment.

Contagious diseases

Service providers are required to notify the Bookings Coordinator of each appointment involving a service user with a contagious disease. A risk assessment will be conducted and appropriate action taken. Cintra will not book appointments where there is an unacceptable level of risk of contagion. A linguist should suspend an appointment immediately if s/he has concerns. During an assignment, linguists should position themselves where the risk of exposure to disease is minimised and they should wear protective clothing as appropriate. They should ensure they follow the service provider's instructions for hand washing etc. at the end of the assignment.

4.14 RADIATIONS

Work undertaken at service providers' premises

Linguists who are pregnant should inform Cintra as soon as practical and also inform the service user before the assignment commences.

Service providers are required to notify the Bookings Co-ordinator of each appointment involving the use of ionising and UV radiations (for example, X-rays, radiography equipment and radioactive substances). A risk assessment will be conducted and appropriate action taken. Cintra will not book appointments where there is an unacceptable level of risk of exposure. A linguist should suspend an appointment immediately if s/he has concerns. During an assignment, linguists should position themselves where the risk of exposure is minimised and they should wear protective clothing as appropriate.

4.15 ACCIDENTS AND EMERGENCIES

First aid boxes at Cintra's premises are maintained by the designated first aider. First Aiders are nominated and receive training.

The Human Resources team will ensure all employees are aware of the location of first aid boxes and the names of the First Aiders. Line Managers will ensure contractors and agency office workers are aware.

All near-misses, accidents, injuries, work-related diseases, dangerous occurrences (e.g. fire or explosion) and deaths should be reported and recorded according to Cintra's Accident Reporting procedures. This includes accidents occurring at Cintra's premises and in the course of providing services to Cintra's customers. The injured person or someone acting on their behalf must report the incident as soon as they can. The reporting procedures differ, depending on where the accident occurs. Each accident record must be kept for at least three years. Completed accident records will be stored securely by the Human Resources team.

All incidents, including actual and threatened violence will be investigated by a nominated investigating officer and appropriate corrective actions identified.

The Human Resources team is responsible for reporting accidents, diseases and dangerous occurrences to the Health and Safety Executive under the Reporting of Injuries, Disease and Dangerous Occurrences Regulations (RIDDOR) 1995.

Emergency procedures – fire and evacuation

The Human Resources team is responsible for ensuring a fire risk assessment is conducted regularly and for commissioning an external assessment when there are significant changes of use of space within the office or alterations to the office. .

The Human Resources team will ensure all employees are aware of the Fire Evacuation procedure.

Line Managers are responsible for ensuring contractors and agency office workers are aware of the procedure.

Line managers are responsible for ensuring escape routes in their own department are free from obstruction.

On a weekly basis the Human Resources Department tests fire alarms, emergency lighting and checks escape routes. Records will be made of fire alarm tests.

The Human Resources Department ensures that:

- the fire alarm system is checked and maintained every six months
- fire extinguishers are checked and serviced annually

Emergency evacuation is tested every six months.

Fire Wardens are nominated and receive training.

4.16 LONE AND MOBILE WORKERS

Office staff are not permitted to work outside of normal office hours without their manager's permission. Staff who are alone on the premises are not expected to carry out tasks which cannot safely be done by only one person e.g. operating equipment or lifting loads etc. They should be wary of allowing unknown enquirers access to the building. They should inform a family member/personal contact of their expected time of arrival home (or inform the Bookings Coordinator, if required, giving clear instructions if they wish the Bookings Co-ordinator to monitor their safe arrival at home).

Home Workers who work alone may contact the Duty Manager if they have any health and safety concerns.

In community settings apart from customers' premises (e.g. in patients', witnesses' or suspects' homes), linguists must not be alone with the service user without the presence of the service provider.

For assignments at police stations, after the assignment, the linguist should not leave the building at the same time or through the same exit as the witness or suspect.

Linguists should park cars at suitable locations at night. For example, linguists should park in police station car parks or ask to be escorted to their car by police officers after an assignment.

Managers who commission contractors who may work alone at Cintra's premises e.g. cleaning staff, should seek assurances in writing from the contractor that lone working issues have been addressed.

Mobile workers at their own discretion should inform a family member/personal contact of their expected time of arrival home, particularly during unsocial hours. A linguist may report in to a Bookings Coordinator if required, but needs to give clear instruction if they wish the Bookings Coordinator to monitor their safe arrival at home.

4.17 MOVING AND HANDLING; WORKING AT A HEIGHT

When lifting or carrying items all personnel should ensure risks to injury are minimised. This includes:

- Assessing the risks before any action is taken.
- Avoiding lifting or carrying heavy or bulky items.
- Considering their shoes, clothing and state of health.
- Considering the positions of their hands, legs and back so that they can adopt a safe posture.
- Ensuring they have sufficient space and/or no obstacles on their route.
- Obtaining help from colleagues.

Heavy or bulky items should not be stored at a height. Normally only contractors will carry out activities requiring working at a height beyond 3 metres. If other personnel need to work or to access anything at a height of less than 3 metres they must use a step ladder in a safe manner and wear suitable footwear.

If personnel have any concerns about moving or handling items or working at a height, they should discuss the matter with their line manager prior to carrying out the activity.

4.18 MONITORING

To check our working conditions and ensure safe working practices, Cintra will:

- Investigate work-related causes of sickness absence.
- Carry out active monitoring, through regular compliance audits.
- Investigate all accidents and potentially harmful incidents.
- Regularly review that prescribed measures are being implemented.

The Human Resources team is responsible for investigating accidents and work-related causes of sickness absence.

The Chief Executive is responsible for ensuring investigation findings have been acted upon to prevent a reoccurrence and for making suitable arrangements for compliance audits to take place.

Health and safety will be standing agenda items at staff and management meetings. Health and safety issues will be reported to the Board at least annually. This Health and Safety Policy will be reviewed by the Board every year.