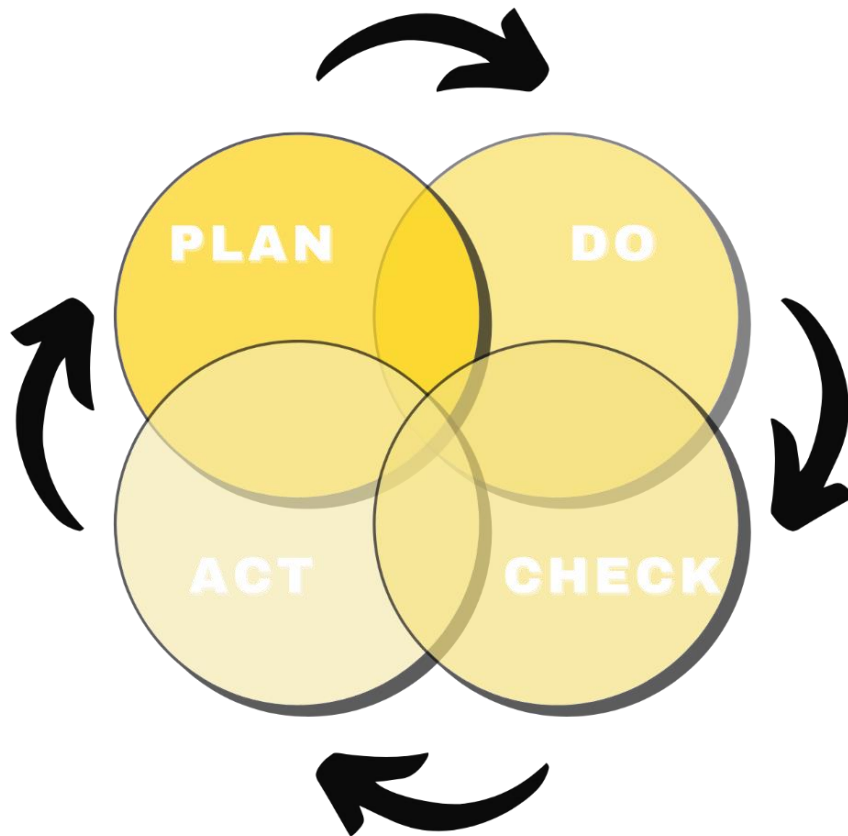COMPASS GROUP

Compass Group UK and Ireland Workplace Safety Management System (WSMS)

ISO:45001: 2018

Certificate Number: 2898-OHS-001

Compass UK&I
Workplace Safety Management System

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Compass UK&I
Workplace Safety Management System

1. Purpose

The purpose this Workplace Safety Management System (WSMS) is to provide a structured approach for managing the prevention of injuries and occupational illnesses.

This Standard specifies the requirements of a WSMS to enable units to provide safe and healthy working conditions for the prevention of injuries and illnesses and proactively improve their health and safety performance.

Units must develop, implement and continually improve their own WSMS, including associated processes and their interactions, in accordance with the requirements of this Standard and any other legal requirement applicable or other requirements to which the unit subscribes such as client specific requirements.

2. Scope

This Standard is mandatory and applies to all of Compass UK and Ireland businesses and joint ventures where Compass Group UK and Ireland is either the majority shareholder or the managing partner. This Standard applies to all individuals (i.e. employees, contractors, including suppliers and visitors), units, outdoor events, offices and any other sites where there are activities under Compass Group UK and Ireland's responsibility.

3. General Requirements

3.1 Leadership and Engagement

3.1.1 Policy and Behaviours

Compass Group UK and Ireland health and safety policy statement outlines senior management's expectations and commitment to health and safety, providing a visible direction for the entire organisation and must be displayed at all Compass Group UK and Ireland locations.

Compass Group UK and Ireland See Care Share behaviours must be adhered to by all employees and are non-negotiable.

3.1.2 Roles, Responsibilities and Accountabilities

Roles and responsibilities must be clearly defined and communicated at all levels of the organisation. The assignment of roles and responsibilities must be reviewed periodically and updated as required. Health and safety responsibilities must be included in all job descriptions.

An overview of the key responsibilities by role and function can be found on the Compass UK and Ireland HSE Website.

3.1.2.1 Leadership, Annual Objectives and Budgeting

All Compass Group UK and Ireland employees in leadership roles (e.g. MD, UK Exec, Sector MD's, Sector Leadership Teams, Heads of Functions, Operational Leads, Unit Managers) are responsible for maintaining a robust health and safety culture. Fundamental to this is making health and safety an overarching value, including health and safety in their annual objectives, budgets and routine staff meetings and taking the lead in promoting health and safety and conducting health and safety management reviews.

Our See Care Share programme underpins our culture when it comes to ensuring we all look out for each other and all of our Leadership Teams must complete the See Care Share Leadership Workshop.

As part of our Leadership Commitment to caring for our people and ensuring positive two-way dialogue, our Leadership Teams have committed to carry out Safety Walks across all of our venues. These Safety Walks will be completed by our UK and Ireland Leadership Team and each of the sector Leadership Teams.

3.1.2.2 Line Management and Employees

Line management are responsible for all health and safety implementation, communication and compliance in their respective areas.

Employees at every level of the organisation must assume responsibility for those aspects of Workplace Safety over which they have control, including reasonable responsibility for their own health and safety and that of others.

All levels of management must hold their direct reports accountable for health and safety performance.

3.1.3 Health and Safety Organisation

A specific health and safety organisation must be defined and implemented throughout the Compass Group UK and Ireland Offices, Units and other locations under Compass UK and Ireland control, to ensure that the line management is adequately supported, guided, coached and challenged.

Each sector Health and Safety lead must report to the Compass Group UK and Ireland HSE Director and be part of the sector Leadership Team.

Compass UK and Ireland will have a sufficient number of health and safety professionals with adequate background, training, capabilities and authority to implement their responsibilities.

3.1.4 Rewards, Recognition and Consequence Management

Managers' and employees' health and safety performance and behaviour must be taken into consideration during the annual performance appraisal process as well as for career progression.

Units must have a program for recognising exemplary health and safety performance.

Units must have a Consequence Management program in place, which must be just and fair, and aligned with the Compass Group UK & Ireland Disciplinary and Grievance Procedures for managing breaches of health and safety Policy and Rules.

3.2 Objectives and Planning:

3.2.1 Health and Safety Vision

Compass Group UK and Irelands, Health and Safety Vision is defined by the Compass Group UK and Ireland Safety Strategy as agreed and signed off by the UK Executive Leadership Team.

All Compass Group UK and Irelands units must implement health and safety programmes and initiatives to ensure alignment with the Vision and achieve the desired outcomes using the Health and Safety Improvement Plan (HSIP) process.

3.2.2 Health and Safety Improvement Plan (HSIP)

All sectors/ units will utilise the annual HSIP process:
1. Identify Trends and Analyse
2. Key objectives for improvement (strategic level)
3. Key objectives for improvement (unit level)
4. Mid-year review
5. Year-end review

Plans will be set for both routine and strategic objectives at the sector and unit level. All sector strategic plans will be tracked and be reviewed by Sector Leadership Team bi-annually.

3.3 Operation and Support Processes

3.3.1 Competent People

Units must ensure that employees and contractors are competent to satisfy the requirements of their roles and responsibilities on the basis of appropriate ability, knowledge and skills gained through education, training, qualification and/or experience.

The recruitment of new employees or promotion of existing employees and the engagement of contractors must include a documented assessment of the health and safety competencies, needed to fulfil the role for which they are being selected or promoted to.

3.3.1.1 Training

Each unit must have a training plan detailing the requirements for health and safety training and how they will be met. The content of this training must take into account local and legal requirements and individual development needs, including managers, supervisors, functional support and all front-line team members. A tracking system must be in place to ensure that training is completed according to in the training plan.

- All employees must be trained to work safely and manage health and safety in their areas.

- All new employees must undertake induction, awareness and training, which must include an assessment mechanism to confirm understanding and knowledge retention. Initial training must include an orientation of the site, as well as general and job-specific training. Training must be also conducted when employees transfer to new roles or when an operating process changes.

- Refresher training must be performed periodically as legally required or as a result of assessment activities, audits and incidents or in response to any significant changes.

- Above Unit Management training will include the mandatory attendance of a See Care Share Workshop to enhance their leadership skills.

- In Unit Management training must include the leadership aspects of health and safety which is
- covered in our GM See Care Share sessions via the Learning and Development Platform .

- Supervisors training must include the leadership aspects of health and safety as well as specific training on the Group's health and safety standards.

- All front line team members will take part in a See Care Share interactive session delivered by their manager to ensure they understand the ethos of See Care Share and the Key Safety Behaviours.

3.3.1.2 Authority to Work and Permits to Work

For all FM and maintenance activities conducted on a Compass site where we are responsible for authorising those works, each unit must follow the Compass Authority to Work Process and where required Permit to Work Process.

Each unit must have a system to identify those tasks that require specific authorisation and track which employees are authorised to perform those tasks.

Full details of the Compass Authority to Work Policy and Permit to Work Policy can be found on the HSE Website.

3.3.2 Communication, Consultation and Empowerment

Units must communicate openly with all stakeholders on relevant health and safety issues. Employee participation in health and safety activities must be encouraged and promoted at all levels of the organisation. Participation in such activities must be taken into consideration when setting annual personal objectives and as part of the performance appraisal process.

The HSE Team will communicate with Units via the Weekly UK and I Comms Process and with a Monthly See Care Share Update. Unit Managers and Above Unit Managers must monitor and ensure these communications are shared with all unit team members.

Units must also hold a site-specific Health and Safety Meeting on at least a twice annually basis, full details of the HSE Meeting Template is available on the Compass HSE Website.

3.3.2.1 Employee Ability to Stop Unsafe Work

All employees must have the authority to stop a task which they deemed is unsafe or unhealthy and be empowered to take the necessary means to correct the situation. Moreover, when confronted with an unsafe or unhealthy work condition, employees must take reasonable immediate and corrective action to address the condition. As a minimum, the employee must inform the person in charge of the area and that person must take actions to mitigate the situation. Where near misses occur and any hazard observation requires further action, these can be reported on AIR3 the Compass UK and Ireland Incident Reporting System.

3.3.2.2 Communication

Compass UK and Ireland will implement a communication system that facilitates top-down and bottom-up communication through appropriate media and tools. Specifically, units must ensure that relevant health and safety information, including health and safety results, fatalities and critical incidents notifications good practices and key lessons, is shared and discussed as per 3.2.2 above.

3.3.2.3 Grievance and Disciplinary Resolution

Units must implement grievance and conflict resolution mechanisms that allow employees and contractors and external stakeholders to directly or anonymously raise issues or make complaints with respect to health and safety performance and management.

3.3.3 Risk Management

3.3.3.1 Risk Assessments

Risk assessments appropriate to the nature and stage of all activities must be systematically conducted in consultation with stakeholders. All reasonably foreseeable hazards and associated risks must be eliminated or reduced to a level of risk that is acceptable before starting any task. Specifically, risk assessments shall be undertaken for:

• All high-risk activities

• All hands-on work where risks are not already controlled through procedures or work instructions.

Appropriate risk controls must be developed according to the "hierarchy of controls" and be prioritised, applied and maintained.

The Company has approached the risk assessment process by identifying all of the significant hazards within our business operations and completing template risk assessment documents for sites to review and personalise to their own particular site circumstances.

The Compass risk assessments are split into 3 different groups of:

Essentials - These risk assessments must be completed, where applicable, in EVERY Compass operating unit, be that a catering unit or a hard FM site. These include risk assessments that are specifically required by legislation or are the cause of a significant number of accidents and injury within the company.

Service Specific - These are the overarching risk assessments that are specific to a particular "soft" service offer e.g. Catering Services, Cleaning Services, Business and Office Services, and Portering Services Further information about these categories of risk assessments can be found on the specific pages of the HSE Website.

Safety Task Cards - These specific safety task cards for activities and types of equipment used within each of the service specific offers. These Safety Task Cards are used as a training tool for our frontline teams so they understand the hazards, risks and control measures they need to follow to keep themselves and others safe.

3.3.3.2 Standard Operating Procedures

Standard Operating Procedures (SOPs) must be developed, implemented and maintained for repetitive tasks, especially critical ones (e.g., hot work, confined space entry, working at height, etc.). Tasks without SOPs shall have a task risk assessment conducted prior to work starting.

3.3.3.3 Contractor Management

Compass has a management processes to select and engage suppliers and contractors so that they are able to identify, prevent and manage health and risks in their supply chains. This shall include processes for prequalification, communication and training in Compass UK and Ireland health and safety requirements and for monitoring and improvement of each contractors' health and safety performance. These management processes must be aligned with the requirements set in the Group Supplier Code of Conduct and related policies as well as with applicable local and national laws and regulations.

3.3.3.4 Occupational Health Management

3.3.3.4.1 Medical Monitoring

All units must have a risk based medical monitoring that includes pre-employment, periodic screening and post-employment medical exams.

3.3.3.4.2 Fitness for Work

Fitness-for-work management processes must be established, including rehabilitation for injured employees and, where appropriate, contractors.

3.3.3.4.3 Occupational Health (OH) Monitoring

The Compass Occupational Health provider is Duradiamond who provide a confidential service for a range of services including assessing fitness to work cases, undertaking health surveillance medicals and undertaking more complex health needs assessments and providing guidance to managers of possible adjustments to work.

The standard process to refer to Duradiamond is for the individual's manager to send a completed referral request form to the HR team at Hradvice@compass-group.co.uk. This will then be referred to the ER Specialist for that particular sector.

The contract with Duradiamond is set up so that majority of the appointments will be telephone consultations with a small number of Occupational Health professionals assigned to the Compass contract, however the option of face to face appointments is also available. Once referred, Duradiamond will assess the individual needs and book the most appropriate appointment. Typically appointments are booked within a couple of days and appointments held, and reports received within 2-3 weeks of the referral being processed.

3.3.4 Food Safety

Compass have entered into a Primary Authority partnership agreement with Luton Metropolitan Council's Environmental Health Department in relation to providing regulatory advice and guidance around our food safety policies and procedures.

Primary Authority is a means for businesses to receive assured and tailored advice on meeting environmental health food safety regulations through a single point of contact.

The Primary Authority will evaluate company policy and provide guidance that all other regulating authorities must follow in evaluating compliance within the regulations, helping to deliver consistent local enforcement standards for multi sited food businesses like Compass.

As such we have a separate Food Safety Management System that has received 'Assured Advice' from our Primary Authority Partner.

3.3.5 Health and Wellbeing

All units must have access to company support systems for health and wellbeing, this may vary dependant on the geographical location however this will be as a minimum Company Nutritionist, Employee Assist Programme (EAP), You Matter campaign material, Ambassadors and Mental Health First Aiders.

As part of the You Matter campaign all operational parts of the company will have access to resources and a network of Ambassadors who will be a source of information and will drive wellbeing within the company. The You Matter campaign is in place to drive awareness and to provide frontline teams with and sources for company information on EAP and Mental Health First Aid. All information and resources on You Matter can be found on the Learning Portal.

The Health and Wellbeing of our colleagues, clients and partners is very important to Compass Group UK and Ireland. As such we have launched a Health and Wellbeing website called Nourished Life (www.nourishedlife.co.uk) . This website is available to all of our colleagues, clients and partners. It contains healthy eating recipes, mental wellbeing activities, physical activities and expert advice from our in-house nutritionists and external partners in Sleep, Fitness and Exercise.

AXA Be Supported: This is our employee assistance programme, it is an independent, impartial advice service that can be accessed online, providing easy, fast and confidential access to information and resources on a wide range of work-related or domestic topics. The information is presented in a way that is both easy to access and understand. There is also a confidential phone number that operates 24/7, 365 days a year and gives our colleagues the opportunity to discuss any concerns they may have.

3.3.6 Emergency Preparedness & Crisis Management

Units must ensure that procedures and resources are in place to ensure that in the event of an incident our people, the public, the environment, our assets and our reputation are protected from harm.

3.3.6.1 Unit Managers Emergency Manual

Our Unit Managers Emergency Manual is the first port of call for a unit manager to assist them in taking the correct action in the event of an emergency situation at their unit. It should be made site specific with the relevant key stakeholder contact information to ensure effective incident escalation. In all situations the Unit Management should also refer to the Crisis Management Guide to determine the severity of the incident and the business impact.

3.3.6.2 Crisis Management Guide

Our crisis management commitment is to address any crisis in an open, honest and effective manner in order to protect the reputation of the company and retain the trust of our consumer, clients, employees and shareholders.

Our prime concern is for the safety and well-being of our employees and members of the public, whilst handling any crisis with the over-riding objective of returning to 'business as usual' as quickly as possible.

The Crisis Management Guide for Managers is designed to show you how our crisis management framework works and how you can escalate an incident to our crisis management team where appropriate.

It outlines the steps to take, to ensure we are able to quickly and calmly confirm the safety of our colleagues in the event of a crisis. We have also included some practical advice from the police on counter terrorism awareness also.

3.3.6.3 First Aid Facilities and First Aiders

First aid and medical facilities and equipment capable of serving all personnel and all identified potential first aid and medical emergency scenarios are available, internally or externally.

All units are required to conduct a First Aid Needs Risk Assessment to determine the equipment and first aid provisions they will require. In some instances, agreement will be received from the client that they will provide first aid cover.

In all instances the unit manager must ensure the relevant level of cover is available and that first aid equipment is maintained and checked on a monthly basis.

3.3.7 Documentation and Record Keeping

All required documentation is kept in line with legal and ISO Standards. Documentation and its processes in relation to the BMS are available for use on the HSE website

When creating and updating documented information, the document owners ensure an appropriate title, date and version number is provided.

Documentation and changes are captured within the Document Control Register which is managed by the HSE Admin/ Website Team.

All records are kept in line with statutory requirements. In general units will keep food safety documentation for a minimum of 6 months and health and safety documentation for a minimum of 6 years.

3.4. Performance Evaluation

3.4.1. Audit and Performance Monitoring

The Company carry out auditing at sites on a regular basis throughout the year to ensure compliance with the management systems.

Auditing frequency and selection of units is determined within each sector on a yearly basis. Auditing is then carried out in line with the ISO Standards.

There are three levels of auditing which are undertaken through the year:

1st Tier: HSE Quarterly Record
2nd Tier: Internal Audit Programme
3rd Tier: Independent External Audits

All Non-Conformances must be closed out in a timely manner by the Unit Manger with the relevant supporting evidence.

Customer feedback is actively sought at each site/contract. Completed documents are retained. Any areas of improvement are identified and investigated. Our customer/clients are periodically provided with customer/client feedback opportunities which, when completed and returned, provide valuable information and input regarding their assessment of our service. Statistical techniques are used in the measurement of customer/client satisfaction levels.

3.4.2. Incident Reporting, Investigation and Corrective Action

Compass UK and Ireland have an online Incident Reporting System (AIR3) that is accessible to all unit teams for the reporting of all incidents, including Food Safety, Injuries to both Compass and Non-Compass Employees, Near Misses, Hazard Observations, Pest Issues, Environmental Incidents and Enforcement Activity.

All incidents that result in an injury to a person that was caused by our actions will require a unit manager to ensure a unit incident review is completed and corrective actions are put in place. An incident investigation pack must also be completed with supporting documentation and witness statements and uploaded to the AIR3 System.

The HSE Team run a Triage system on a daily basis to review all incidents and ensure the relevant response is taken.

On a weekly basis the HSE Leadership Team review all significant incidents such as Lost Time, RIDDOR, Food Allergies, Foreign Bodies in food and Enforcement Activity to ensure all incidents are investigated and learnings are shared. Then the reports are shared with the Leadership Teams of each sector.

3.5. Management Review

3.5.1. Management Review Process

Management reviews are undertaken at least annually to review results and ensure the ongoing suitability and adequacy of the WSMS. For evidence of Management Review inputs, outputs and attendees, please refer to the agendas and meeting minutes.
Each sector leadership team should conduct a review of their business risks and incidents on a monthly basis. As such the Incident data and trends are shared on a weekly basis via an HSE Dashboard and Reporting format that is issued to the Sector Leadership Team for review.

3.5.2. Management Review Documentation

A copy of the minutes of the Management Review Meetings are available on the HSE Website.

4. Training

4.1. Training Formats

Our Learning and Development team have created a number of online e-learning training courses, these cover Health and Food Safety, Allergies, Infection Control and other relevant job specific courses. All of these are accessible to our teams and courses are allocated dependant on job role. We also have a Training and Awareness page on our HSE Website which has additional Safety Conversations which can be used as pre-shift briefings on specific topics and where there are learnings from any significant incidents we use a format called "Safety Shares" to ensure all colleagues can learn from incidents and promote a positive safety culture.

4.2. Training Records

Training records for all e-learning completed are held on the Learning and Development platform and unit managers can access training reports for their teams and are also notified by email when team members are due to refresh their training as are the individual team members to ensure all learning is kept up to date.

5. Record Retention

5.1. Health and Safety Records

Health and Safety documentation such as Risk Assessments and training records must be kept for a minimum of 6 years.

Occupational Health Records will be kept for a minimum of 40 year.

All incident data is maintained and recorded on our on-line Incident Reporting System Origami.

All other records will be kept in line with statutory requirements.

5.2. Food Safety Records

Food Safety documentation will be kept for a minimum of 6 months in line with our Food Safety Management System requirements

6. Document Control

A Document Control Register is available and maintained by our HSE Admin and Website team to ensure all documents are monitored, reviewed and issued as required to ensure they are reviewed, up to date and current.

Appendix A - Definitions

Accountability: a person is accountable to a person of higher authority for task areas which have been delegated
to them. Accountability follows lines of command and reporting relationships within the organizational hierarchy.

Competence: ability to apply knowledge and skills to achieve intended results.

Corrective action: action to eliminate the cause/s of a non-conformity or an incident and to prevent reoccurrence.

Document: written standards, procedures, work instructions, etc. that describe intended actions.

Hierarchy of Controls: the following hierarchy must be used in the development and application of controls:
1. Elimination of the hazard;
2. Substitution of less hazardous materials, processes, operations or equipment;
3. Engineering and process controls;
4. Warnings/signage, administrative controls or management strategies; and
5. The use of personal protective equipment (PPE).

Line management includes managers and supervisors who have direct management responsibility for workplaces or sections of workplaces including employees and contractors and other persons who may be
present in those workplaces. Their responsibilities include the basic functions of planning, organizing (including staffing), leading and controlling.

Non-conformity: non-fulfilment of a requirement.

Process: set of interrelated or interacting activities which transform inputs into outputs.

Procedure: specified way to carry out an activity or a process.

Records: written documentation of activities that have taken place such as training records, meeting minutes, risk assessments, permits to work, amongst others.

Responsibility: a task area, duty, obligation, or liability delegated to a person by a higher authority for which they are held accountable by the higher authority.

Risk Assessment: the overall process of hazard identification, risk analysis and risk evaluation. It involves the
evaluation of the risk(s) arising from a hazard(s), taking into account the adequacy of any existing controls, and
deciding whether or not the risk(s) is acceptable.

Unit: a site or a group of sites that are under the responsibility of a single line manager.