

# LEAFLET 34 4C SYSTEM

# MANAGEMENT OF VISITING WORKERS AND CONTRACTORS

SSD&CD
Safety, Sustainable
Development and
Continuity Division

# **AMENDMENT RECORD**

Amd	Date	Text Affected	Authority
No			and Date
1	Dec 07	Leaflet Completely revised	Defence Estates Oct- Dec 07
2	Sep 08	Paragraph 3.1.h – amended to read "Provide trained and competent staff to undertake the duties detailed in (5(a) to 5(d) above. Within the context of the 4Cs system, all those involved in the process must possess a degree of competency appropriate to their role. Annex D - Recommendations for Competence Levels - provides guidance on the required level of competence for each party"	Defence Estates Sep 08
3	Sep 08	Paragraph 5.3.2 amended reference to Annex D second sentence to read Annex E and third sentence to Annex E to read Annex F	Defence Estates Sep 08
4	Sep 08	Paragraph 5.6.3 amended to read "In addition to the training required by the duty holders identified in this document, an overview should be provided of the 4C system to all new arrivals to a Unit and specific briefings are to be given covering the arrangements in place for the 4C area in which they will work. A Tri-fold leaflet – The MOD 4Cs System – A Guide for Visiting Workers and Contractors contained in Annex G is provided as a suggested method for making information available to MOD personnel and visiting workers and contractors."	Defence Estates Sep 08
5	Sep 08	New Annex D added and subsequent Annexes renumbered	Defence Estates Sep 08
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# **REVISION NOTE:**

Leaflet 34 was completely revised during Sep 07 by the 4Cs Leaflet Working Party

Leaflet was revised in Sep 08, see amendment sheet for details

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### Leaflet 34

# 4C SYSTEM - MANAGEMENT OF VISITING WORKERS AND CONTRACTORS

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#### **FOREWORD**

This leaflet is published under the authority of the Chairman of the Defence Occupational Health and Safety Board (OHSB). This leaflet is for application across all areas of MOD and the Armed Forces reflects recent changes in legislation and MOD practises.

# 1. Scope

- 1.1 This leaflet specifies the requirements how MOD can effectively manage visiting workers and contractors at any MOD site, appropriate to the level of risk of those hazards on any given site.
- 1.2 The guidance contained within this leaflet applies to all work where two or more employing organisations, including MOD organisations, TLBs, agencies and units, share the same workplace, whether temporarily or permanently

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### 2. INTRODUCTION

- 2.1. The four main elements required in any visiting worker and contractor management system are: co-ordination, co-operation, communication, and control. Effective application of the four elements of this system, often referred to in MOD as the 4Cs system, will reduce the likelihood of harm or damage arising from the actions of MOD, visiting workers and contractors working on MOD sites
- 2.2 This document describes a structured methodology that will enable MOD TLB Holders to ensure that all Commanding Officers / Heads of Establishments (CO/HoE) of MOD sites can manage and control the hazards in any shared work area or any other hazards that may be introduced as a result of work activities.
- 2.3 Guidance on the selection of contractors can be found in JSP 375, Volume 2 Leaflet 45, the Acquisition Management System, and the Commercial Managers' Toolkit and on the HSE website at <a href="https://www.hse.gov.uk">www.hse.gov.uk</a>.

#### 3. PROCESS OVERVIEW

- 3.1 Top Level Budget Holders/Agency Chief Executives must ensure that a management system that includes arrangements to enable effective co-ordination, co-operation, communication and control (4Cs) when dealing with visiting workers and contractors is implemented for all establishments under their control. Any visiting worker/contractor management system that is introduced must ensure that the personnel at MOD's establishments:
  - a. Co-ordinate the MOD and visiting workers and contractors activities.
  - Co-operate with all interested parties when implementing control measures.
  - c. Communicate to the visiting workers/contractors the known hazards and control measures that the MOD has implemented. (Must consider combined hazards)
  - d. Have appropriate arrangements in place to monitor and control work activities and procedures. For contractors (MACs, PFIs, RPCs etc.) these arrangements should be implemented by the appropriate IPT, who should keep the CO/HoE informed as part of the 4C System.
  - e. Have a management organisation in place to enable visiting workers and contractors to comply with serials 3(a) to 3(c) above, regarding their own activities.

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- f. Select contractors who are competent and are able to comply with the health and safety aspects associated with their undertakings (JSP 375, Volume 2, Leaflet 45)
- g. Clearly identify the responsibilities of the MOD and visiting workers/contractors for controlling health and safety risks in any locally produced contract, and that the duties are transferred to any sub-contractor when and where appropriate.
- h. Provide trained and competent staff to undertake the duties detailed in 3(a) to 3(d) above. Within the context of the 4Cs system, all those involved in the process must possess a degree of competency appropriate to their role. Annex D Recommendations for Competence Levels provides guidance on the required level of competence for each party.
- 3.2 Top Level Budget Holders / Agency Chief Executives are to ensure that establishments under their control have appropriate arrangements in place to implement the key elements and components identified in this Guidance Note.
- 3.3 Top Level Budget Holders / Agency Chief Executives are to ensure that the management of visiting workers and contractors is monitored on each establishment/unit as part of their existing health and safety audit programme.
- 3.4 Some establishments may need to use non-MOD staff to carry out some of the functions within the management system. If this is the case, individual contract conditions may need to be modified.
- 3.5 Units based or operating overseas must, in accordance with SofS Policy statement, implement measures to ensure, where reasonably practicable, compliance with UK Legislation and standards. In addition, they will comply with relevant host nations' standards which cover the control of visiting workers and contractors as appropriate.

# 3.6 The Key Elements and Components of the 4C Framework consist of:

#### **3.6.1 4C Elements:**

- a. **The 4C Duty Holde**r: A manager(s) appointed, in writing, by the CO/HoE to manage the procedures for visiting workers and contractors (See para 4.1 and 4.2)
- b. Area Custodian: A person appointed by line management, to compile the hazard registers for the area concerned and liaise with visiting workers and contractors

- c. **Host**: Any MOD Manager, or their representative who requests a visiting worker/contractor to carry out activities at an Establishment
- d. **Visiting Workers**: Any worker not normally working in the area where they are to undertake a task, this includes MOD employees not normally employed at the location concerned
- e. **Contractor**: Any organisation engaged through a contract to undertake services on behalf of the MOD
- f. **Transient/Regular Visiting Worker**: Workers whose activities present a trivial risk, and who, after receiving an initial H&S induction briefing, do not need to obtain further H&S induction briefings each time they arrive, (e.g. delivery drivers, cleaners etc)

# 3.6.2 C Key Components:

- a. 4C Areas: Establishment subdivided into manageable 4C Areas.
- b. **4C Area Hazard Register**: A concise, one page summary (if practicable) of the significant hazards in a 4Cs Area, together with the control measures and precautions required. The 4C Area Hazard Register must be prominently displayed within the entrance to any building / facility it covers
- c. **Establishment Hazard Register**: The collation of all 4C Area Hazard Registers into one document. Used for reference when visiting workers/contractors activities cover a number of 4C Areas.
- d. **Task Risk Assessment**: Risk assessments produced by the visiting workers, contractors or their hosts that take into account the hazards of the local 4C Area, as well as the intended operation hazards.
- e. Visitors Log: A record of who is working in a 4C Area.

## 4. ROLES AND RESPONSIBILITIES

# 4.1 Commanding Officer/Head of Establishment (CO/HoE). The CO/HoE will:

- a. Select and appoint a manager, the 4Cs Duty Holder, from within their management team, to act on their behalf.
- b. Make provision for the 4Cs Duty Holder to receive any additional training and resources necessary for him/her to be competent and effective in the role.

- c. Provide access to competent support and advice on the health and safety aspects of a task or procedure for the management of visiting workers and contractors, to aid each of the persons carrying out the above duties.
- 4.2 The CO/HoE is the 4Cs Duty Holder until such time as he/she has put in place effective local management arrangements and has formally appointed (by letter) the 4Cs Duty Holder to act on their behalf.

# 4.3 4Cs Duty Holder.

- 4.3.1 The 4Cs Duty Holder is a person(s) (depending on the needs of the establishment), with the appropriate management attributes, competence and authority formally appointed in writing by the CO/HoE to manage on his/her behalf the process for the management of visiting workers and contractors on their establishment(s). The 4Cs Duty Holder(s) does not need to be a subject matter expert as this is a co-ordination role. However, they must have access to competent health and safety support and advice. The responsibilities of the 4C Duty Holder are provided in Annex A
- 4.3.2 The 4Cs Duty Holder will implement and manage the 4C System for the Establishment.
- 4.3.3 Appropriate arrangements should be made to ensure that the post of 4Cs Duty Holder is covered during normal working hours.

### 4.4 Area Custodian.

- 4.4.1 An Area Custodian is a person of suitable rank/grade, with the appropriate knowledge and experience, appointed by the line manager (in consultation with the Appointed 4Cs Duty Holder) to compile a hazard register(s) for their 4Cs Area(s) of responsibility and to communicate and co-ordinate on health and safety matters with any visiting workers and/or contractors, prior to work commencing. The responsibilities of an Area Custodian are provided in Annex B
- 4.4.2 The position of Area Custodian is crucial to the 4C System as it signifies:
  - a. The "ownership" of a physical space or asset (the 4C Area)
  - b. Being a "focal point" for H&S issues
  - c. Being aware of who is working in an Area
- 4.4.3 The role does not require a detailed knowledge of or technical competence in the various work activities. These are the responsibility of the various specialists involved.

4.4.4 The role of "focal point" is to act as a focus for the exchange of H&S information. It is not intended that this will require the Area Custodian to be the local H&S Representative, although in some 4C Areas, this might be so.

### 4.5. Host.

- 4.5.1 The "Host" is the sponsor of a work activity, and therefore all visiting workers and contractors will have an **identifiable** Host, on whose behalf they are acting. The responsibilities of a Host are provided in Annex C
- 4.5.2 The Host will be responsible for the engagement of competent visiting worker/contractor and provide instruction with regard to site H&S briefings.
- 4.5.3. It is the responsibility of the Hosts to <u>ensure</u> that the competence of a visiting worker or contractor has been checked and approved, including training aspects.
- 4.5.4 Guidance on the selection of contractors is in JSP 375 Volume 2 Leaflet 45
- 4.5.5 Examples of typical Hosts include:
  - a. Maintenance Management Organisations (MMO)<sup>1</sup>, e.g. PPP/PFI/RPC/MAC
  - b. Defence Estates (See para 4.5.6 below)
  - c. Supply Units/Organisations
  - d. Principal Contractors (CDM) engaged for work outside of the Regional Prime Contract
  - e. Other MOD Organisations, including IPTs (e.g. DCSA, DE&S)
  - f. Lodger Units and Encroachments
  - g. Any Line Manager directly requesting a visiting worker/contractor to attend.
- 4.5.6 Where a Regional Prime Contractor (RPC) has been appointed Defence Estates (DE) will be the host for the RPC at all establishments.
- 4.5.7 When appointed, the RPC will be the host for all sub-contractors brought onto sites by them. The RPC is **not** the host for any other visiting workers or contractors other than those engaged to work on the Regional Prime Contract.
- 4.5.8 For other contracts, DII, PFIs, MACs, Equipment Maintenance Contracts etc. the IPT will be the host. Where the IPT does not have a local site presence, or cannot

<sup>&</sup>lt;sup>1</sup> Maintenance Management Organisation (MMO) is the generic term used to represent the contractor providing services under all delivery

staff this role locally, alternative arrangements must be made, by the IPT, with the Establishment to ensure that the host's responsibilities are effectively discharged

- 4.5.9 Local (on-site) hosts may be the person delegated the task of getting a visiting worker/contractor through the gate. They may not necessarily have the competence to sign for the work (nor should they if they are not in control) but they will be required to ensure that the visiting worker/contractor is provided with relevant 4Cs information.
- 4.5.10. It should be noted that individuals also assume Host responsibilities for those they invite onto the site in a private capacity (e.g. a visiting contractor engaged to repair a car windscreen). Whilst it is unreasonable to expect the same rigorous procedural measures to be applied in this case, as the safety risks should be trivial, all personnel need to be made aware of their responsibility to ensure that appropriate arrangements are made to escort the visitor, provide a brief on site hazards, and to ensure that the visitor does not endanger others."

# 4.6. Visiting Worker / Contractor.

- 4.6.1 A visiting worker/contractor is any person who does not normally work in the area, and who intends to enter it to carry out a work activity.
- 4.6.2 Visiting workers / contractors shall, where appropriate, provide the host with risk assessments and method statements relative to the task and co-operate and co-ordinate with the host.
- 4.6.3 Visiting Workers/Contractors can include:
  - a. Internal support workers (e.g. personnel from another part of the Establishment)
  - b. Consultants (e.g. carrying out surveys, tests, inspections etc)
  - c. Contractors of all types (e.g. catering, cleaning, telecoms, construction etc).

### 4.7 Transient/Regular Visiting Worker.

- 4.7.1 A transient/regular visiting worker is a sub-group of visiting workers where the following special factors generally apply:
  - a. Their activities usually present a "trivial" risk to health and safety
  - b. They may arrive unannounced, or out of normal working hours
  - c. It is considered unnecessary for them to receive an individual local Induction/Briefing from the Area Custodian each time they arrive to work.

- 4.7.2 In order to "fast-track" certain of these groups through the 4C System, e.g. office equipment service personnel; they can be defined as "Transient/Regular Visiting Workers".
- 4.7.3 It is important that people working in the 4C Area are aware that such people (cleaners, office equipment service personnel etc) may suddenly arrive, generally unannounced, and carry out their work. This awareness is important for all people working in the Area, whether they are contractors, or local employees.
- 4.7.4 While a transient / regular visiting worker will not normally need to receive a health and safety briefing each time they visit an establishment they will report to the Area Custodian to ascertain if any changes in work activities or processes have occurred since their last visit.

#### 5. PROCESS DETAIL

#### 5.1 THE 4C SYSTEM - DETAILS OF COMPONENTS

- 5.1.1 The allocation of titles to persons performing the role of Area Custodians may vary from establishment to establishment, for example an Area Custodian could be a Building Manager, Building Custodian, Asset Manager etc. It is imperative that, irrespective of the titles used that visiting workers, contractors and hosts are aware of whom these persons are for 4C purposes.
- 5.1.2 The title of '4Cs Duty Holder' must be used by all Establishments as this is the recognised nomenclature throughout MOD and its contractors. A sign identifying the name of the 4C Duty Holder must be clearly displayed where visiting workers and contractors book in to the site and the name and contact details of the 4C Duty Holder provided at the health and safety briefing.

#### 5.2 4C Areas - Subdivision of Establishment

- 5.2.1 **General.** A fundamental requirement of the 4C System is for an Establishment to be divided into geographical areas or physical assets, which will be known as 4C Areas. An area can be:
  - a A structure or asset, such as a mast, chimney, tower, bridge or tunnel, external areas, including road networks, ranges, airfields, jetties, storage yards etc, including over-ground and underground services
  - b. A building, or part thereof (e.g. a plant room)
  - c. A group of buildings
  - d. An Establishment

- 5.2.2 **Initial review of current situation.** The current/existing situation regarding the physical assets/workplaces on an Establishment is to be reviewed by the 4C Duty Holder in conjunction with relevant line managers. This review is required in order to establish:
  - a. The extent of the various Areas (including "satellite" Areas)
  - b. Who is responsible for the physical asset(s) / workplace(s)
  - c. The significance and number of risks identified within the specified Areas
  - d. What existing controls measures are already in place and the personnel nominated for controlling access to the area (e.g. Building Custodians, Asset Managers)
  - e. Any planned changes.
- 5.2.3 **Criteria for subdivision and grouping for Area Custodians.** The boundaries of the Establishment are to be determined. Any parts of the Establishment in which the 4C System will not be applied need to be identified, (e.g. housing areas not under MOD control).
- 5.2.4 Within the boundaries of the Establishment the various assets are to be listed (e.g. buildings and surrounding areas etc). Each asset represents a potential 4C Area. However, if there are groups of assets which have the same hazards (similar functions) and can be controlled by the same Area Custodian they can be combined into a single 4C Area with a single Area Hazard Register.
- 5.2.5 An Area Custodian will have "ownership" of one or a number of 4CAreas. The number and location of the Areas "owned" by an Area Custodian will depend on several factors:
  - a. Existence of localised boundary fences, e.g. compounds
  - b. Existing management demarcations and arrangements
  - c. The ability of the Area Custodian to control the Areas
  - d. The physical proximity of the Areas
  - e. The nature of the hazards relative to the Area Custodian's own knowledge and experience.
- 5.2.6 **Plan & Schedule of Areas.** When the Areas have been defined and agreed, a plan which identifies them and clearly defines their boundaries is to be produced and made available as and when required. A schedule of the Areas (and Area Custodians)

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# 5.3 Area Hazard Register

- 5.3.1 **General.** This document is critical to the 4C system. It will enable MOD to inform visiting workers and contractors of the hazards they will come into contact with. Each defined 4C Area will have its own Area Hazard Register, which is collated, maintained up to date, reviewed and held by the Area Custodian.
- 5.3.2 **Hazard Register Contents.** The Area Hazard Register includes the following:

(An example of a completed Hazard Register is given in Annex E and a blank Register Form in Annex F)

- a. Fixed Hazards. Including details of the hazards associated with the structure / infrastructure, these will be inserted into the Register by the organisation or individuals responsible for holding the relevant records or information (e.g. MMO).
- b. Working/Operational Hazards. The working/operational hazards will be added by the Area Custodian following discussion with those who have the best knowledge of the hazards and their control measures (and based on draft text provided by these persons).
- c. Information on Location of Risk Assessments, Precautions and Remarks. Supplementary Information (e.g. the location of existing risk assessments and requirements for the operation of permits) is also added during the above phases.
- d. Transient / Occasional Visiting Workers. The Hazard Register is to contain a list of Transient/Occasional Visiting Workers to the Area and indicate the nature of the induction/briefing required by them.
- 5.3.3 **Preparing the Area Hazard Register.** The Area Custodian is responsible for the collation of the Area Hazard Register. Details relating to the fabric of the Area will generally be provided or inserted by the MMO. The Area Custodian will add information relating to working/operations within the Area, following discussion with area line managers.
- 5.3.4 The Area Custodian is to liaise with the 4C Duty Holder, line managers and others regarding the Transient and Occasional Visiting Worker section of the Register.
- 5.3.5 The Area Custodian holds the master copy of the Hazard Register for his Area(s). The Hazard Register must be maintained and kept up to date.

- 5.3.6 A copy of all the Area Hazard Registers is to be held by the 4C Duty Holder. This compilation constitutes the Establishment Hazard Register. A copy of the Establishment Register should be made available to the MMO and any other party affected.
- 5.3.7 Where Hazard Registers are held on computer on a local area network (LAN), then the 4C Duty Holder must ensure suitable access and revision arrangements are in place and maintained.
- 5.3.8 **Use of the Area Hazard Register.** The Area Hazard Registers must be kept available in the 4C Area to which they pertain for the provision of information to all visiting workers and contractors and be supplied to potential visiting workers or contractors
- 5.3.9 **Maintenance and Review of Area Hazard Register.** The Area Custodian must ensure the Area Hazard Register is updated whenever he is aware of any change of information (such as a new hazard being introduced or a change to his contact details). Line Managers and MMOs should inform Area Custodians of any known changes. The changes should be brought to the attention of those who might require this information. However, the Area Custodian should endeavour to publicise any significant changes via Notice Boards for MOD employees and at visiting worker and contractor Briefing/Inductions.
- 5.3.10 The Register shall be reviewed at least annually by the Area Custodian in conjunction with all interested parties and will be the subject of a formal audit by the 4C Duty Holder.
- 5.3.11 **Establishment Hazard Register** This document is the amalgamation of all 4C Area Registers into one document, and is to be used by the 4C Duty Holder to determine the Establishment's significant risks and is to be related in the "Main Gate" Induction Brief.
- 5.3.12 The Establishment hazard register must also be available to visiting workers and contractors when their activities span a number of 4C Areas at an establishment.

# 5.4 Incorporating 4C Elements into Works and Project Documentation and Procedures

5.4.1 Work in prescribed areas or on prescribed activities. If the 4C Duty Holder in conjunction with Establishment Health and Safety Advisor and line managers) has decided that a certain Area(s), part of an Area or a high-risk activity requires special controls, these must be implemented as part of the 4C System. Such risks may already be covered by Permits to Work or other control systems (e.g. SRPs), but others will require a Line Manager or Area Custodian to authorise the commencement of work in writing. Documentation is to be introduced to incorporate this. The 4C Duty Holder is to hold a list of "special activities/ locations" and publicise this to all at the Establishment and any identified Hosts.

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- 5.4.2 Consideration needs to be given to the following:
  - a. The Host/MMO is to verify that they have ensured:
    - i. Contractor competence is satisfactory
    - ii. Risk Assessments are site-specific and satisfactory
    - iii. Technical briefings have been given to contractor/visiting workers
    - iv. Information in relation to the hazards brought in by the contractor/visiting worker has been conveyed to all other interested parties
  - b. The visiting worker/contractor is to sign to verify that the:
    - i. Hazard Register has been seen and information noted
    - ii. Area Custodian has been contacted and Local Briefing(s) received, including and special instructions or control measures
    - iii. Hazards and risks brought in by the visiting worker/contractor have been advised to the Host/Area Custodian.
- 5.4.2 **Work activities instigated by Works Orders.** These cover a large proportion of the jobs where visiting workers/contractors are brought in to share workplaces. Various documentation systems and procedures exist, although most have similar features. A copy of the relevant sections of the Hazard Register is to be attached to all Works Order Requests/Forms and sent to the person responsible for handling work requests.
- 5.4.3 **Construction Projects.** For projects which come within the Construction (Design and Management) Regulations (CDM), the MOD Client' as defined in JSP 375 Vol 2 Leaflet 20 Health and Safety in Construction and the Management of Construction on the Defence Estate is to instruct the CDM Co-ordinator to ensure that the 4C System elements are brought to the attention of the Principal Contractor for inclusion in the Construction Phase Safety Plan(s) (and allied procedures) to be used by the Principal Contractor.
- 5.4.4 Non-Works (work that falls outside a Regional Prime Contract) and Non-Construction Jobs. For these activities, where a visiting worker/contractor is required to share a workplace (e.g. carpet fitting ordered by a "Supplies" unit) the sponsor/host are to ensure that the aspects of the 4C System are outlined in standard documentation and procedures.

- 5.4.5 **The Visitors Log**. Every 4C Area will produce and maintain a 4C Visitors Log to enable the Area Custodian to know which visiting workers/contractors are in the 4C Area.
- 5.4.6 The 4C Visits Log is a record of:
  - a. Who the visiting workers/contractors are
  - b. The purpose of their visit
  - c. Where they are working in the 4C Area
  - d. Whether an induction briefing has been received
  - e. When they are visiting (i.e. time-in and timeout).
- 5.4.7 It is used by the Area Custodian, and also may be of use by others, e.g. Fire Services and Security.
- 5.4.8 All visiting workers/contractors, including transient or occasional visiting worker to a 4C Area are to sign a Visitors Log.
- 5.4.9 The format and use of the Visits Log should be agreed between the 4C Duty Holder, Area Custodian and appropriate Area/Line Managers.

# 5.6 Risk Assessment and the 4C System

- 5.6.1 **General.** The 4C System recognises that there are many different approaches used by different organisations in carrying out risk assessments. While Contractors may use different formats for their assessments to those used in the MOD, the basic principles detailed in JSP 375 Vol 2 Leaflet 39 'Health and Safety Risk Assessment' should apply and suitable and sufficient assessments should be undertaken and made available to relevant personnel.
- 5.6.2 **Task Risk Assessments.** One of the 4C System's fundamental objectives/principles is to provide a mechanism for enabling satisfactory and relevant information to be passed to those who need it, enabling suitable and sufficient site specific risk assessments to be made by visiting workers/ contractors.
- 5.6.3 **Information, Instruction and Training** In addition to the training required by the duty holders identified in this document, an overview should be provided of the 4C system to all new arrivals to a Unit and specific briefings are to be given covering the arrangements in place for the 4C area in which they will work. A Tri-fold leaflet The MOD 4Cs System A Guide for Visiting Workers and Contractors contained in Annex G is provided as a suggested method for making information available to MOD personnel and visiting workers and contractors

#### 6. RELATED DOCUMENTS

6.1 The following elements of JSP 375 Vol. 2 should be read in conjunction with this Leaflet

Apr 09 Replaces Leaflet dated Sep 08

- a. Leaflet 20 Health and Safety in Construction and the Management of Construction on the Defence Estate -
- b. Leaflet 23 Site Risk Assessment
- c. Leaflet 39 -Health and Safety Risk Assessment
- d. Leaflet 45 -Contractor Selection

### 7. **DEFINITIONS**

4Cs	Co-ordinations, Co-operation, Communication and Control
CDM	Construction (Design and Management) Regulations

CO Commanding Officer

DCSA Defence Communication Service Agency

DE Defence Estates

DE&S Defence Equipment and Supply
DII Defence Information Infrastructure

HoE Head of Establishment
H&S Health and Safety

HSE Health and Safety Executive
IPT Integrated Project Team
JSP Joint Services Publication
LAN Local Area Network
MAC Multi Activity Contract

MMO Maintenance management Organisation

PFI Private Finance Initiative
PPP Public Private Partnership
RPC Regional Prime Contract

TLB Top Level Budget

# Leaflet 34 RESPONSIBILITIES OF THE 4C DUTY HOLDER

# 1. Responsibilities of the 4C Duty Holder

- 1.1 The 4C Duty Holder responsibilities can be summarised into five key areas:
  - a. <u>Emergency preparedness.</u> The 4C Duty Holder must ensure that arrangements are in place to deal with emergencies and that all relevant parties are aware of such arrangements through Establishment safety and emergency briefings.
  - b. <u>Identification of hazards</u>. The 4 CDH must combine all Area Registers into an Establishment Hazard Register, which is to be made be available to all site personnel, hosts, visiting workers/contractors in order for them to understand fully the potential hazards that they will have to consider and mitigate.
  - c. <u>Communication of hazards</u>. The 4C Duty Holder must ensure that systems are in place for visiting workers/contractors to receive a relevant site safety briefing and to understand the nature of the hazards in their proposed area of work. Such briefings must:
    - i. take place prior to the commencement of work
    - ii. ensure that all hazards in the specific area are identified and explained, and
    - iii. include daily changing hazards, Emergency and Disaster Plans, and evacuation procedures.
  - d. <u>Interfacing duties with MMOs and other contractors</u>. The 4C Duty Holder is responsible for providing hazard information within his competence. He is not responsible for any technical hazards or aspects of the work, unless he is responsible for a technical facility, e.g. Aquatrine for water. The host, typically DE, MMO, PFI or MAC contractor, is responsible for communicating technical hazards and for providing the management of the contractor's competence, safety and work quality, via appropriate 'Safe Systems of Work' as described in JSP 375 Vol 2. The 4C Duty Holder must co-ordinate the provision of hazard information, including ensuring the co-ordination of information on matters outside their area of competence.
  - e. <u>Feedback and co-ordination</u>. The 4C Duty Holder must ensure that regular feedback from Establishment personnel on the safety performance of contractors and hosts is gathered and assessed, and failings reported to the appropriate MOD Management (CO/HoE, DE DDEM. IPT)

# LEAFLET 34 RESPONSIBILITES OF AN AREA CUSTODIAN

# 1. Responsibilities of an Area Custodian

- 1.1 The Area Custodian responsibilities include these key areas:
  - a. <u>Identification of hazards</u>. The Area Custodian must compile and maintain an Area Hazard Register, and maintain the associated risk assessments and hazard surveys that underpin the register's information. This should be done with officials who are competent to assess the risks of the site hazards such as technical staff from the MMO and their main contractors. The 4 CDH will combine all Area Registers into one Establishment Hazard Register.
  - b. <u>Communication of hazards</u>. The Area Custodian must know of the systems in place for contractors and visitors to receive a relevant site safety briefing to understand the nature of the hazards in their work or visit area, and contribute to such briefings as required. The briefings must: take place prior to any commencement of work; ensure that all hazards in the specific area are identified and explained; and, include daily changing hazards, Emergency and Disaster Plans, and evacuation procedures.
  - c. <u>Interfacing duties with DE and other contractors</u>. The Area Custodian is responsible for providing hazard information within his competence. He is not responsible for any technical hazards or aspects of the work, unless he is responsible for a technical facility, e g Aquatrine for water. The host, typically DE, RPC, PFI or a MAC contractor, is responsible for communicating technical hazards and for providing the management of the contractor's competence, safety and work quality, via appropriate 'Safe Systems of Work' as described in JSP 375 Vol 2. The 4C Duty Holder must co-ordinate the provision of hazard information, including ensuring the co-ordination of information on matters outside their area of competence.
  - d. <u>Feedback and co-ordination</u>. The Area Custodian must contribute to the feedback on the safety performance of contractors and hosts which the 4C Duty Holder will gather and report to the appropriate MOD Manager. (CO/HoE, DE DDEM. IPT)

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# LEAFLET 34 RESPONSIBILITIES OF A HOST

# 1. Responsibilities of a Host

- 1.1 The Host responsibilities include these key areas:
  - a. <u>H&S Briefings</u>. Hosts must decide what level of safety briefing would be appropriate for their visiting worker(s)/contractor(s), and arrange any briefings in conjunction with the Area Custodian(s)/4C Duty Holder/Security or Guardroom personnel. Security/Guardroom Personnel should provide a general site brief for all visiting workers/contractors and should not allow escorted visiting workers/contractors to proceed until collected by an appropriate site representative
  - b. <u>Notification.</u> The host must notify the Guardroom, and 4C Duty Holder as necessary, of the arrival details and briefing requirements of any visiting worker, contractor or visitor.
  - c. <u>Before a visiting worker/contractor commences work.</u> The host must consider, prior to any work commencing, whether a Risk Assessment is required. He should liaise with the relevant Area Custodian or 4C Duty Holder and check Area or Establishment Hazard Registers, in order to make that decision.
  - d. <u>Competency.</u> The host must clearly identify, to the visiting workers and contractors that they are about to appoint, all aspects of the work that they want completing, in order to ensure that are competent to undertake the task(s) required.
  - e. <u>Safe systems of work</u>. Hosts must consider whether the scope of work requires the use of specific 'Safe Systems of Work' such as permits to work (PTW)<sup>1</sup>.
  - f. <u>Risk assessments</u>. The host must ensure that any risks associated with the work have been considered thoroughly. They must check the risk assessments of visiting workers or contractors and/or their proposed control measures.
  - g. <u>Monitoring.</u> Hosts must consider how they will monitor the work that is being carried out by their visiting workers or contractors to ensure that it is conducted to the agreed standards and procedures i.e. the use of personal protective equipment (PPE) and PTW etc.
  - h. <u>Reporting.</u> Hosts must always consider the safety performance of contractors and visiting workers and report any failings.

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<sup>1 &#</sup>x27;Safe Systems of Work' are detailed in JSP 375 Leaflet18

# MANAGEMENT OF VISITING WORKERS AND CONTRACTORS RECOMMENDATIONS FOR COMPETENCE LEVELS

### INTRODUCTION

- 1.1 The MOD system for the management of visiting workers and contractors, relies on the principles of co-ordination of work; co-operation and communication between all relevant parties and control of the ensuing activity (The 4C's).
- 1.2 In order for the system to be successful, interaction between certain key parties is essential. Equally, however, a certain level of knowledge has to be held by the parties involved. This paper examines the skill sets required and gives recommendations for a common matrix of competencies for all involved.

#### 2. THE 4C'S MANAGEMENT STRUCTURE

- 2.1 The 4C's system is built around the concept of controlling all activity within the *environs* of an "Establishment". The Establishment may vary in size from a single building, to a geographically diverse region, with outstations, remote sites; lodger units and other non-standard features or arrangements. What singles this out as an "Establishment" is that all such estate comes under the command / management of a single appointment of either a Commanding Officer (CO) or Head of Establishment (HoE). This post is ultimately responsible for all activity that takes place within the confines of the Establishment.
- 2.2The CO/HoE is responsible for making, or ensuring that appointments are made of the following:
  - i) The 4C's Duty Holder A manager to oversee the procedures for visiting workers and contractors
  - ii) Area Custodians Persons appointed to compile the hazard register for their own areas of responsibility, and to liaise with visiting workers and contractors.
- 2.3 The 4C's system also identifies the following roles:
  - i) Hosts Any MOD Manager, or other manager resident on the Establishment, who invites any non-resident person or organisation to carry out work activity of any nature on the Establishment.
  - ii) Contractors Any organisation engaged through contract to carry out services on behalf of the MOD or other Host.
  - iii) Visiting Worker Any worker, working in an area where they are not normally employed. N.B. This can include service personnel and MOD employees.
  - iv) Regular Visiting Worker A visiting worker who carries out the same activity in the same location / locations on the Establishment on a frequent basis (e.g. cleaners)
  - v) Transient Worker A visiting worker who enters an Establishment to carry

out a finite task of short term duration (e.g. delivery driver)

- 2.4 In drawing up this common matrix of competencies, the following additional role players have been identified:
  - i) Security Staff Those responsible for verifying and validating the identity of persons wishing to enter the Establishment.
  - ii) Maintenance Management Organisation (MMO) Management Staff MMO staff are often the Host for visiting contractors. They have a critical role to play in validating the competence of such Contractors and in controlling the work that they undertake.

#### 3.0 COMPETENCE

- 3.1 Competence is held to be that combination of knowledge, training and experience that enables an individual or organisation to perform an activity efficiently and in safety with minimal supervision.
- 3.2 Within the context of the 4C's system, each of the above parties must possess a degree of competence appropriate to their role. The elements that build towards that competence will be acquired over the career development of those individuals who fulfil the roles. There is therefore no one hard and fast route by which these must be achieved. With this concept, a matrix of recommended competencies, by role, is given at Appendix A.
- 3.3 An indication of the envisaged typical content of each of the competency 'elements' is given at Appendix B.

# JSP 375 Vol 2 ANNEX D

# **MATRIX OF RECOMMENDED COMPETENCIES**

# Appendix A

Key:  M = Must know S = Should know	Commanding Officers / Heads of Establishment	4C's Duty Holder	Area Custodians	Establishment Security Staff	Hosts / MMO Management Staff	MMO Technical Staff	Contractors - Management Staff	Contractors - Supervisory Staff	Contractors - Site Operatives	Regular Visiting Workers	Transient Workers
Recommended knowledge base											
General Establishment H&S induction	М	М	М	М	М	S					
General environmental awareness induction	М	М	М	М	М	S					
4C's System - detailed		М	S		S	S	S	S			
4C's System - overview	M		М	М	М	M	М	M	S	S	S
4C' System - essentials									M	М	M
4C's – Application to specific contracts	M	М	S	S	M	S					
Risk Assessment - detailed	S	M	M		М	M	M	S			
Risk Assessment - overview								M	S	S	S
CDM Regulations - detailed					S	М	М	S			
CDM Regulations - overview	S	S			М			М	S		
Recommended training standard											
IOSH Directing Safely (or equivalent)	S										
IOSH Managing Safely / NEBOSH General Certificate (or equivalent)		S			S	S	S				
CIEH Supervising Safely (or equivalent)			S					S			
IOSH Working Safely (or equivalent)				S					S	S	S

### Appendix B

# TYPICAL CONTENT OF COMPETENCY ELEMENTS

<u>General Establishment H&S Induction</u>: Establishment Safety Policy; Safety Plan; Establishment Safety personalities / AP's etc; Summary of principal site hazards; Site Rules; Out-of-Bounds areas; Speed limits; Fire alarm & fire evacuation procedure; Bomb warning alarm and procedure; Procedure for summoning emergency Services; *Any individual safety responsibilities specific to role* 

<u>General Environmental Awareness</u>: Establishment Environment Policy; Environmental protection plan; Energy conservation; Waste minimization; Site recycling plan; Protected habitats / SSSI's

<u>4C's System – Detailed:</u> JSP 375 (working knowledge); Leaflet 34 (detailed knowledge); 4C's Roles and Responsibilities; 4C's Areas & Area Custodians; Hosts; Area Hazard Registers; Establishment Hazard Register; Visitors Logs; Managing the exchange of safety information; Control of works

<u>4C's System – Overview:</u> JSP 375 (outline knowledge); Leaflet 34 (working knowledge); 4C's Roles and Responsibilities; 4C's Areas & Area Custodians; Area Hazard Registers; Managing the exchange of safety information; Control of works

<u>4C's system – Essentials:</u> 4C's Areas & Area Custodians; Area Hazard Registers; exchange of safety information.

<u>4C's – Application to specific contracts</u>: Principal Support Contracts (Regional Prime; Project Aquatrine; Project Vanguard; Project Allenby / Connaught; PFI contracts; MAC's); Area Custodians in the Supply Chain; Authorising Engineers and Authorised Persons; Authority Local Representatives; Contract specific documentation (Statement of Known Hazards & etc)

<u>Risk Assessment – Detailed:</u> Differentiation between hazard and risk; Quantification of risk; Principles of prevention; Development of Hazard Registers; Ability to undertake a competent assessment of risk; Development of appropriate control measures and work plan / safety method statement; Communication of the findings

<u>Risk Assessment – Overview:</u> Ability to understand and comply with the outcome of a risk assessment

<u>CDM Regulations – Detailed</u>: Scope of application (ALL construction); Roles and duties of Clients; Designers; Contractors; CDM Co-ordinators; Principal Contractors; Requirements for competence; Site security requirements; Site welfare arrangements; General safety provisions; Notifiable Work and accompanying additional duties; Pre-tender information; Construction phase safety plans; Safety Files.

<u>CDM Regulations – Overview</u>: Roles and duties of Contractors; Site security requirements; Site welfare arrangements; General safety provisions; Construction phase safety plans; Site Rules

# **LEAFLET 34**

# **EXAMPLE OF A 4C SYSTEM AREA HAZARD REGISTER**

# **ESTABLISHMENT:**

Area	Asset No./Ref.	Area Custodian	Deputy Area Custodian	4C Duty Ho	older
MMO Office Workshop & Stores	468	Name: J Bradley Tel. 2601	Name: A Monk Tel: 2602	Name: C Cu Tel. 7902	urtis
Date Prepared 10/3/2006	Last Revised 10/3/2007	Last Reviewed 10/3/2007	Date Rec'd by 4C Duty Holder 19/3/2006	Issue No	Page 1/1

Ref	Location	Activity or fixed asset-brief description	Hazard Class (see over)	Risk Assess. held by	Precaution s required by Visiting Workers (e.g. Permit to Work)	Remarks e.g. Access, requirement / equipment, Risk to other Areas
1	MMO Office	Fixed Hazards Electrical Switching Access to switchgear via locked cupboard	Elect Fire	MMO		Refer to Risk Assessment Note – Isolation by approved person Permit to work
2	MMO Office	Asbestos cement roof	Frag Asb Height		Permit to work	No fixed access equipment is provided
3	Workshop	Fixed Hazards Manhole in S.W. corner of store	Conf	MMO	Refer to Risk Assessment Note – Permit to enter	Step irons removed in 1992
4	Workshop	Operational Hazard Abrasive wheels periodically in use	M/C	Worksho p Manager	Refer to Risk Assessment Note – Keep clear whilst in use	
5	Stores	Sodium Hypoch- olorate used in maintenance of swimming pool	Haz- chem	MMO	Refer to Risk Assessment Note-Access to stores only if accompanie d	

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# TRANSIENT/REGULAR VISITING WORKERS

These lists cover known miscellaneous visiting workers in an area (<u>not</u> works contractors) who may arrive unaccompanied/out of working hours, and who do not need to receive an Induction each time they arrive, or sign in.

(i) The following people only require a <u>standard Establishment briefing/induction</u> (at the main Gate, or by their local management):

# Delivery personnel, people attending meetings

(ii) The following people require additional briefing/induction (generally local and "once-only", except for changed circumstances).

Visitor type	When visits possible	Induction/briefing required
Cleaners	Daily – Except Sunday	Host to induct/brief 'Clean Care'
Refuse Collectors	Once/Week	Establishment safety brief an relevant
		Hazard Registers to be sent to
		Contractor's HQ

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#### **LEAFLET 34**

## **4C SYSTEM AREA HAZARD REGISTER**

#### **ESTABLISHMENT**

Area	Asset No./Ref.	Area Custodian	Deputy Area Custodian	4C Duty Hole	der
		Name: Tel.	Name: Tel:	Name Tel.	
Date Prepared	Last Revised	Last Reviewed	Date Rec'd by 4C Duty Holder	Issue No	Page

Ref	Location	Activity or fixed asset – brief description	Hazard Class (see over)	Risk Assess. held by	Precautions required by Visiting Workers (e.g. Permit to Work	Remarks (e.g. Access, requirements / equipment, Risk to other Areas

# TRANSIENT/REGULAR VISITING WORKERS

These lists cover known miscellaneous visiting workers in an area (<u>not</u> works contractors) who may arrive unaccompanied/out of working hours, and who do not need to receive an Induction each time they arrive, or sign in.

(i) The following people only require a <u>standard Establishment briefing/induction</u> (at the main Gate, or by their local management):

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# Delivery personnel, people attending meetings

(ii) The following people require additional briefing/induction (generally local and "once-only", except for changed circumstances).

Visitor type	When visits possible	Induction/briefing required

# **HAZARD CLASS**

ACTIVITY BASED			
CONF	Confined spaces		
EXCAV	Excavation work		
VOIDS	Unguarded voids and openings in floors and structures		
HEIGHT	Working at heights (over 2m)		
FRAG	Access to or work on Fragile roofs		
ACCESS	Hazards associated with accessing work area		
VEH	Moving vehicles, pedestrian interface		
WATER	Working in or over water or other liquids (not including diving)		
DIVE	Under-water diving		
LIFT	Lifting operations		
MAN	Manual handling		
ULD	Upper limb disorders		
IMPACT	Collision with moving objects		
SLIP	Slippery surfaces		
FALL	Falling objects		
TRIP	Tripping		
HEAT	High air temperatures, hot surfaces		
COLD	Low air temperatures, wind chill, cold surfaces		
VIB	Vibration		
VISB	Restricted visibility		

OTHER		
TRESP	Trespassers	
OTHER	Please describe	
ASSIST	All visitors to be accompanied	

PLANT & EQUIPMENT AND INFRASTRUCTURE		
M/C	Machinery with exposed moving parts	
PRESS Med. to high pressure containers and/or systems.  Compressed air and gasses		

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TOOLS	Hand tools, power tools
SCAF/LAD	Scaffolding and Ladders
ELECT	Electrical
FIRE	Including risk of spontaneous combustion
GAS	Gas installations
WS&D	Water supply and drainage
COMM	Communications equipment

ENVIRONMENT		
NOISE	Noise	
LIGHT	Inadequate lighting	
VENT	Ventilation	
WEATH	Adverse weather (including flooding)	

(See Activity Based Hazard Class for heat/cold, trips/slips/falls & atmospheric pollution)

ARTICLES & SUBSTANCES		
HAZCHEM	Chemical	
BIO	Biological agents	
ASB	Asbestos	
DUST	Respirable and inhalable dusts	
CANCER	Carcinogens	
ION	Ionising radiation	
NONION	Non-ionising radiation	
COM	Combustible/flammable materials	
EXPL	Explosive materials	
POL	Petroleum Oil and Lubricants	

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# Annex G

# THE MOD 4C'S SYSTEM - A GUIDE FOR VISITING WORKERS AND CONTRACTORS

#### The 4C's Process

Host calls visiting worker to site

#### Step 1:

### Report to Guardroom / Security Post

Receive general site induction brief

#### Step 2:

### Report to Host

- Discuss detail of job and method of working
- Exchange of known hazard information (Communication)
- Review of Risk Assessment
- Requirement for Permits to Work (Control)

#### Step 3:

### Report to Area Custodian

- Discuss detail of job and method of working (Cooperation)
- Exchange information on particular site hazards
- Exchange information on other activity in the area (Co-ordination)
- Sign visitor's log

#### Proceed with task

#### On Completion:

Notify Area Custodian

### **Notify Host**

Note: On some sites, where the Host is not resident, Steps 1 & 2 may be reversed.

# A demarcation agreement has been set up for my work area. Do these arrangements still apply?

On some Establishments, where a formal demarcation agreement has been set up, some variation to these arrangements may be applicable. You should refer to the **4C's Duty Holder** for clarification.

#### How will I know who the Area Custodian is?

Your **Host** should be able to tell you who the relevant Area Custodian for your activity is. Some Establishments display "Area Custodian" signs outside the office of the post-holder. If there is doubt, you should refer to the **4C's Duty Holder**, whose contact details are given below.

#### **Site Contacts:**

The following contact numbers may be obtained from any military phone:

FIRE or OTHER EMERGENCY: 2222 or xxxx

4C's Duty Holder: xxxx

[Name of MMO] Office: xxxx

(Host for most maintenance activity)

Authority Local Representative (ALR): xxxx

(Host for Project Aquatrine)

Guard Room: xxxx

Establishment Safety Adviser: xxxx

A Suppliers Association publication

4C's information leaflet: v2 13 Feb 08



# THE MOD 4C'S SYSTEM - A GUIDE FOR VISITING WORKERS AND CONTRACTORS

Your safety, health and wellbeing whilst working on this Establishment is of key importance. This leaflet describes the arrangements to ensure your protection and the protection of those working around you. It applies equally to MOD staff and service personnel, as well as to all other visitors. Please take a few minutes of your time to read this through. If there are any questions it doesn't answer, a list of contacts is given on the reverse, to whom you may refer for further guidance.

### So what are the 4C's, exactly?

MoD Establishments, due to the nature of activities undertaken, often present visitors with an unusual range of hazards. Many of these change on a daily basis. Equally, maintenance work and repair work can all introduce hazards of their own. Sometimes the two sets of activities can conflict. Effective safety management, therefore relies on the following principles:

- That the work of different organisations is **Co-ordinated**
- That different organisations Co-operate to ensure that work is carried out safely
- That different organisations **Communicate** on safety matters
- That, where there is a conflict of interest, that work is **Controlled**, to ensure respective tasks are carried out in a safe manner.

#### So how does it work?

The person who invited you to this site is known as your **Host**. This may be an MOD member of staff, or a representative of one of the other organisations resident on this site. They are responsible for notifying the Guardroom / Security Post of your arrival. The **Host** is also responsible for ensuring that your work is managed in a safe manner.

#### Step 1 – Arrival:

When you arrive at the site, you will need to report to the Guardroom / Security Post, in order to gain entry to the site. Here, you will be given a general site briefing on the collective safety and security arrangements for the site (Fire evacuation procedure; Speed limits; use of cameras; mobile phones etc.)

#### Step 2 – Report to Host:

Once you have been admitted to the Establishment, you should report to your **Host.** They will discuss the detail of the job you have come to do, and your intended method of working. They may also need to see your Risk Assessment. The **Host** will also tell you if a 'Permit to Work' is needed for your activity.

#### Step 3 - Report to Area Custodian:

Each building or area on this Establishment is under the control of an **Area Custodian**. This may, or may not, be the same person as your **Host**. He or she is responsible for co-ordinating the day-to-day activity in any one area of the Establishment. They will advise you of any particular hazards in their area and let you know of any other activity taking place at the same time. They will also need to know what work you intend to carry out, to ensure that this does not conflict with any other local activity. You will also be asked to sign the visitor's log. Once this discussion has taken place, you will be able to commence work.

A flowchart, describing this process is given opposite.

#### Other frequently asked questions:

I've been called in to do an urgent repair. Hasn't the Host done all this co-ordination and communication before I get here?

Your **Host** should have pre-notified all relevant people of your arrival. However, he or she will not know how you intend to work, nor all the other activities happening on site at the same time. No job is so important that time cannot be taken to get these first steps right.

I'm just a delivery driver / I just came here to attend a meeting. Do I need to go through all this?

Where your work is unlikely to have an impact on anybody else, the general site induction given at Step 1 may be sufficient. Your **Host** will determine this.

I've been in and out of this Establishment for years. Surely I don't have to do this every time I come in?

Where workers carry out routine or regular and repetitive tasks, some Establishments may allow for Steps 1 & 2 to be covered by a periodic briefing given by the **Host**. However, you will still need to report to the **Area Custodian** to exchange information on the day-to-day activity in the area in which you intend to work.

I've been called in out-of-hours, and neither the Host nor Area Custodian is available. What am I supposed to do?

This situation arises when responding to task that requires an urgent repair. You should only attempt to "make safe" or carry out such restoration work as is within your competence, and as has been agreed with your **Host**. If they are not physically present on site, further advice from your **Host**, should be sought by telephone.

#### **ESTABLISHMENT RULES:**

#### **General Rules:**

No alcohol or drugs may be brought onto this site.

Smoking is NOT permitted anywhere except designated areas.

All persons employed on this site must display a valid establishment pass.

Photography is not allowed.

Bags, holdalls and boxes etc may not be left unattended at any time, except inside designated areas.

Escorts are required for entry into any of the following:

Insert any Establishment specific areas here

#### Permits to Work:

A Permit to Work MUST be obtained prior to carrying out any of the following activities:

Excavation; Hot Work; work on electrical systems; work on fuel installations; work on boilers or other pressure systems; work at height; work in any manhole or confined space. (Contact your Host for details)

#### Rules for vehicles:

The speed limit around the establishment is 20 mph

Columns of marching service personnel ALWAYS have priority

Parking is only permitted in designated areas. Grassed areas are out of bounds.

Reversing delivery vehicles must always have a guide.