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Openreach Partner Health, Safety and Environmental Mandatory Policy Requirements

About this document ...

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Content approval

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1 *Introduction*

BT/Openreach takes the health, safety, and wellbeing of its employees and those who work on its behalf very seriously. BT/Openreach takes a positive approach to health, safety and wellbeing through the promotion of a positive safety culture to help avoid illness or injury arising from work activities. Our goal is 'Everyone Home Safe and Well'.

This document sets out how BT/Openreach expects its partners, their employees, contractors and subcontractors to conduct themselves whilst working on its behalf and the specific rules that must be followed.

2 *Definitions*

Arrangements - What the partner (including sub-contractor), is going to do in practice to achieve the requirements stated.

Breach – Breaking or failing to adhere to a set process or procedure in relation to the health and safety, which has been specifically created to minimise risk, injury, death or ill health.

CANDID – Contractor Access Network Delivery Information Database – This is a partner portal allowing access to BT/Openreach process and procedure documentation. Access is granted after the relationship has been established.

CDM – Construction (Design and Management) Regulations 2015. Regulations for managing health, safety and welfare on construction projects.

DNO – Distribution Network Operator – Utility organisation responsible for the transmitting of electricity within regions.

HSE – Health and Safety Executive. Health and safety regulator of the United Kingdom.

HSG – Health and Safety Guidance documents published by the HSE, providing supporting advice to help understand and comply with the specific legal duties regarding health and safety Legislation.

HPP – Hazardous Pipeline Process – Defined process for highlighting the hazards relating to hazardous pipelines and other high-risk assets in the vicinity of proposed BT/Openreach works.

Partner – Third party organisation which is appointed to undertake work on behalf of BT/Openreach. Reference to partners includes any subcontractors engaged by the partner.

TETRA – Safety system for using a ladder to prevent falls.

Work – Activities undertaken by the partner (including sub-contractor), for Openreach and any activities in relation to that work.

Workers – Partner employees, employees of partner contractors and subcontractors, and agency workers undertaking work on behalf of BT/Openreach.

ZOI – Zone of Interest – Where a proposed work activity falls within a 75 metres radius of a listed asset. This is identified when carrying out either a LinesearchbeforeUdig (LSBUD) search or safe dig print searches through utility owner(s) direct portal who are not registered to LSBUD.

3 *Legislation*

As set out in the contract between BT/Openreach and the partner, the partner must comply with all applicable law including health, safety, and environmental legislation.

It is the responsibility of the partner and their subcontractor(s) to review and incorporate the relevant aspects of current UK legislation and Health and Safety Executive Guidance into the work they undertake. Examples of which are, but not limited to:

- Health & Safety at Work Act 1974
- The Construction (Design and Management) Regulations 2015 (CDM)
- The Management of Health and Safety at Work Regulations 1999
- Managing For Health and Safety (HSG65)
- Investigating Accident and Incidents (HSG245)
- Avoiding Danger from Underground Services (HSG47)
- Pressure Systems Safety Regulations 2000 (PSSR)
- New Roads and Street Works Act 1991 (NRSWA)
- The Working Time Regulations 1998
- The Regulatory Reform (Fire Safety) Order 2005
- Part 3 of the Fire (Scotland) Act 2005, supported by the Fire Safety (Scotland) Regulations 2006.
- Provision and Use of Work Equipment Regulations 1998 (PUWER)
- Lifting Operations Lifting Equipment Regulations 1998 (LOLER)
- Control of Vibration at Work Regulations 2005
- Control of Noise at Work Regulations 2005
- Working At Height Regulations 2005
- The Health and Safety (Display Screen Equipment) Regulations 1992
- Safety Representatives and Safety Committees Regulations 1977

- Health and Safety (Consultation with Employees) Regulations 1996
- Equality Act 2010
- Disability Equality Act 2010
- The Environment Act 2021
- The Health and Safety (First Aid) Regulations 1981
- Building Regulations 2022
- The Conservation of Habitats and Species Regulations 2017
- Environmental Protection Act 1990 (Inc. duty of care for waste)
- The Town and Country Planning Act 1990
- The Wildlife and Countryside Act 1981
- The Water Resources Act 1991

4 *Safety Management System*

BT/Openreach requires all partners and subcontractors to have a suitable and sufficient health, safety and environmental framework in place for the safe and efficient delivery of the work, with embedded capability to understand the operating environment, the specific legal and contractual requirements, and the level of risk within the contract.

To this end, a management system must be in place to meet all requirements detailed within 'Managing for Health and Safety (HSG65)'. The management system must include:

- Written health and safety policy
- Named director responsible for implementing the health and safety policy
- Safety objectives and targets
- Defined accountabilities and responsibilities at all levels from site engineers to directors
- Employee involvement in improving health and safety
- Training and accreditation
- Induction / onboarding of employees and contractors
- Hazard and risk management and communication
- Risk assessment
- Safe systems of work
- Putting people to work
- Plant, equipment and materials

- Accident, incident and near miss reporting, investigation and close out
- Welfare
- Personal protective equipment
- The Construction (Design and Management) Regulations 2015 Duty Holder roles
- On site auditing and monitoring
- Arrangements for audit and review of the management system
- Continuous improvement through metrics including:
 - Management system audit results
 - On site audit results and trends
 - Incident investigation trends
 - Feedback from consultation with workers

Partners undertaking civils work in the public Highway are also required to have arrangements for the management of high pressure pipelines in accordance with SFY/HSR/D053 - Planning Excavations Including Hazardous Pipeline and Zone of Interest Process (HPP & ZOI).

A health and safety risk register is required, stating all significant health and safety risks associated with the works being undertaken on the BT/Openreach contract, including mitigating actions.

BT/Openreach will audit the health and safety management in accordance with its governance programme (refer to section 5) or at any time it is deemed necessary.

5 *BT/Openreach Partner Onboarding and Assessments*

Before a potential partner is permitted to work on behalf of Openreach, a 'pre-capability' assessment of their health and safety management system will be undertaken. This assessment will determine whether the potential partner can meet the requirements of this document and whether its management system aligns with that of BT/Openreach.

The assessment comprises a number of questions for which evidence of implementation is required. If gaps are identified, a period of time will be agreed with the potential partner to close. The assessment must be satisfactorily completed for the potential partner to be engaged.

The assessment may be followed up with visits to live sites to witness and speak to the workers.

The partner should refer to '**Openreach Contractor Pre-capability Guidance Document**', which will be provided prior to the assessment.

Partners undertaking civils works in the Highway shall also undergo a high-pressure pipeline assessment, in accordance with section 6.19.

Thereafter, partners will be subject to periodic in life assessments to determine that the health and safety management system is being appropriately maintained. This may involve visits to live sites to witness and speak to the workers.

If an existing partner wishes to undertake a new scope of work, a change of scope of work assessment will be undertaken to ensure that the new scope has been incorporated into the management system.

6 ***BT/Openreach Health, Safety and Environmental requirements***

Partners must have arrangements in place to manage health, safety and environment that can be verified by assessment to meet BT/Openreach's requirements.

6.1 Accident, Incident and Near Miss Management

Partners shall comply with 'The Management of Health and Safety at Work Regulations 1999', and the requirement to plan, organise, control, monitor and review health and safety arrangements. Health and safety investigations form an essential part of this process. This includes a process for reporting and investigating incidents, accidents, near misses, utility damages etc., including the recording of recommendations and closure.

6.1.1 Accident, Incident and Near Miss Reporting

When categorising events, partners will do so, in line with '**Openreach Health & Safety Event Matrix**' (see figure 1), which will be used to determine the actual outcome of the event. BT/Openreach will determine the potential outcome.

Figure 1 - Openreach Health & Safety Event Matrix

Safety and Health – Event Matrix

To be used for all accidents and incidents (potential to expand to include environment)

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Actual or Potential (Reasonably Foreseeable) Consequence	Actual	Potential	Examples
<ul style="list-style-type: none"> • Fatality • Work related terminal ill health • Life changing injury or illness (permanent disability) e.g. loss of site, serious burns • RIDDOR – reportable dangerous occurrences 	Very Serious Event (VSE)	High Potential Event (HPE)	<ul style="list-style-type: none"> • Pole collapse injuring employee or MoP • HPP Strike/near miss • Contact with High voltage • Fall from significant height or adjacent to additional hazard e.g road or railings • Occupational cancer / asbestosis
<ul style="list-style-type: none"> • Lost time injury • Work related ill health lost time • Restricted duties • Professional medical treatment/hospitalised as inpatient 	Serious Event (SE)	Medium Potential Event (MPE)	<ul style="list-style-type: none"> • Slip, trip and fall resulting in fractured ankle • Hand Arm Vibration (HAVs) • Carpel Tunnel Syndrome (CTS)
<ul style="list-style-type: none"> • First Aid Treatment • No medical treatment required 	Event (E)	Low Potential Event (LPE)	<ul style="list-style-type: none"> • Minor cut from contact with • Minor low speed Road Traffic Collision

The partner must report the following safety incidents to the Openreach Contractor Safety Assurance Team within 24 hours of the incident occurring, by contacting the Openreach Accident Incident Reporting Group (AIRG) via telephone on 0800 671345:

- High potential near misses – including but not limited to serious Streetworks failures
- Hazardous Pipeline Process (HPP) near miss or process breaches
- RIDDOR events
- Lost Time Incidents
- Any serious and very serious event (in accordance with figure 1)

Contact is then to be made directly to the aligned Contractor Safety Assurance Team representative, via telephone to inform them of the incident and that a CARM report has been made.

AIRG is supported by live operators between 08:30 and 17:00. Any calls outside of this will divert to an answering system where event and contact details are to be left. AIRG will call back within office hours.

6.1.2 Accident, Incident and Near Miss Investigation

Arrangements must be in place for event (accident, incident and serious near miss) investigation, recording and reporting in accordance with HSE guidance 'Investigating accidents and incidents (HSG245)'.

Responsibility for completing investigations is with the partner organisation. Partners must also own the investigation of incidents sustained by their subcontractors.

These arrangements must include the immediate, underlying and root causes of an event and appropriate corrective actions to prevent reoccurrence, with assigned timescales and owners. The partner must ensure the corrective actions are closed out, fully embedded and be able to provide evidence of closure when requested by BT/Openreach.

A full investigation report will be required within 14 days from notification of the event, submitted to the Contractor Safety Assurance Team via safetypartners@openreach.co.uk.

Any extensions to the 14 days will need to be requested in writing to the Openreach Contractor Safety Assurance Team via safetypartners@openreach.co.uk. The outcome of the request will then be confirmed by return.

The Openreach Contractor Assurance Team will complete 2nd line assurance and will review the partner's documented investigation report, with a view to acceptance. Reports will be returned for completion and re-issue where information required is not provided.

6.2 Monthly Data Reporting

Partners undertaking civils work will be required to provide a monthly data report to the Contractor Safety Assurance Team as per the template current at the time. This report is to be sent by the 5th working day of each calendar month.

The report comprises three sections:

1. High Level Statistics
2. Safety Checks
3. Zone Of Interest (ZOI)

Instructions to complete the report are contained within '**Openreach Monthly Data Report**', available from the Contractor Safety Assurance Team.

Data must include that related to work subcontracted by the partner.

6.3 Training and Accreditation

Partners shall ensure they are fully compliant with the document **‘AEI/ACC/Z003 Licensing, Quality Management & Accreditation for Partners Working in the Openreach Network’**, available on CANDID.

Partners shall ensure that all workers have the necessary skills, knowledge, training, and experience to undertake their work.

Relevant training and qualifications are to be captured, recorded and maintained current.

Partners shall have arrangements to capture, verify and manage training records and certificates including a matrix, stating the training required for each job role and a system to manage re-training, refresher training and expiring training.

These arrangements shall include the engagement of new employees and training for career change and progression within the organisation.

In addition to industry standard training and qualifications, all partners must comply with the current Openreach skills matrix, with accreditations recorded on Smart Awards, the national awarding and end point assessment organisation.

All persons must have their Smart Awards cards present at all times when working on behalf of Openreach.

No one is to be put to work without the correct and in date training and accreditations.

There are some industry standard qualifications that are deemed equivalent to the Smart Awards modules and these are contained within the skills matrix.

New starters may work for up to 16 weeks without being fully accredited, whilst in the process of gaining their accreditations. During this period, they must be supervised by a fully accredited operative.

The partner shall ensure that all their support staff working on behalf of BT/Openreach are recorded through the BT/Openreach Contract Compliance Database.

All partners providing an engineering service on behalf of BT/Openreach but not working on the network e.g. auxiliary services such as traffic management operatives, will need to be recorded on the Openreach Contract Compliance Database.

Individuals who do not hold the necessary competencies for all the works being delivered in line with Smart Awards and in the Openreach skills matrix will be stopped from working immediately.

6.4 Health and Safety Advice and Support

Partners shall have access to competent health and safety advice and support to manage, maintain and improve the health and safety management system and provide on-going support.

The partner shall determine that their support is competent.

6.5 Alcohol and Drugs

Partners and their subcontractors must ensure that their employees are free from drugs and/or alcohol while working on behalf of Openreach and have measures to manage the use of legitimate prescribed medication.

6.6 Domestic and Wild Animals

Measures must be in place to manage the risk of contact with domestic and wild animals. This must include risk assessment for individuals working in the vicinity of domestic pets and in areas where the presence of wild animals are foreseeable.

6.7 Asbestos

Non-licensed and licensed work with asbestos must be undertaken with the appropriate controls in place, in accordance with The Control of Asbestos Regulations 2012.

A documented process must be in place to manage the action to take when asbestos is identified at site. Employees and sub-contractors must be aware of the precautions to take to prevent exposure.

Those undertaking the work must have had the correct level of information, instruction and training, to protect themselves (and others in the area) from the risks to health that exposure to asbestos causes. The work must also be undertaken in accordance with a documented safe system of work, including risk assessment and method statement.

Asbestos is to be disposed of in accordance with the Waste duty of care code of practice (section 34(9) of the Environmental Protection Act 1990) and the mandatory Openreach Supplier Environmental Policy which can be found on CANDID.

6.8 Colour Vision Deficiency

Persons working on behalf of Openreach must have the ability to correctly read job packs and safe dig prints. This includes site teams, supervisory staff and support functions. As prints would normally contain contrasting coloured

lines, it is important that the reader can see these correctly. For those involved in the job validation and hot job process, evidence of colour vision deficiency testing must be maintained. An example of a colour vision deficiency test is:

[Colour vision deficiency \(colour blindness\) - NHS \(www.nhs.uk\)](https://www.nhs.uk/conditions/colour-vision-deficiency/)

6.9 Confined Spaces

6.9.1 Classification of Confined Spaces

Working within confined spaces must be in accordance with The Confined Spaces Regulations 1997. Additionally, arrangements need to be aligned to the BT/Openreach process as outlined below:

A - Low Risk

For the most part low risk confined spaces are going to include all Openreach surface boxes; from the smallest JB up to multi lid JUF's and JRC's. Access to these structures will be covered, for most engineers in their basic training – anyone who has completed a gas testing and cover lifting course will be able to access these structures.

A space will be considered low risk if when working in the structure the engineer were to stand up all of their head would be above ground level.

B - Medium Risk

To enter a medium risk confined space engineers will need to be trained in the use of a tripod fall restraint system; and on how that system can be used to facilitate the recovery of a conscious or unconscious casualty from the confined space.

A structure will be considered a medium risk confined space when it is:

- A surface that when stood up any part of an engineers' head is below ground level.
- Or any manhole:
 - Less than 6mts total depth
 - 3mtr or shorter entry shaft
 - No more than 10mtrs from entry/exit point. Note: The entry/exit point is the point directly below the shaft; not the foot of any ladder (if fitted)
- No obstructions between work point(s) and exit

The criteria above for manholes allows the safe and effective deployment of Openreach fresh air blowers. Manholes within these limits but where blowers can't be or aren't deployed must be considered high risk (other than for short periods for access/egress).

The limits above are set to allow, in the event of a gas alarm, a **single** manhole occupant to exit the manhole in a time equal to or shorter than fitting an emergency escape set.

C - High Risk

Any structure outside of the definitions for low and medium risk confined spaces will be considered a high-risk space. This will include but not limited to:

- Manholes outside of the above dimensions.
- Congested, or obstructed manholes.
- Any multi-level manhole below level 1.
- Manholes where access via a winch system is required.
- Any Medium risk space where 2 or more people are working in the structure.
- Any Medium risk space where a hazard is known to be present e.g.
 - History of gas alarms
 - Spaces known to be tidal or where the structure “makes” water after de-watering.
 - Excavations in the medium risk category where spoil remains in the surcharge area.

Deep level tunnel access is managed by CBRE in line with the process contained in [Deep Level Tunnel Access](#) document.

High risk confined spaces can be accessed by engineers trained to access medium risk structures with the assistance of a specialist rescue team. The specialist team will assess the structure prior to entry and provide onsite instruction on the use of emergency escape sets to be used at the site.

6.10 Cover Lifting and Gas Testing

The correct lifting keys must be used for lifting covers, whilst employing constant gas monitoring equipment. BT/Openreach specify the type of Gas Detection Unit (GDU) utilised is a 4 head unit with additional toxic sensors for carbon monoxide (CO) and hydrogen sulphide (H₂S).

Below is a list of associated risks which should be, but not limited to, included in a risk assessment for cover lifting and gas testing:

- PPE
- Equipment checks
- Roadworks guarding
- Gas testing procedure

- Excavation
- Footway cover lifting
- Identification of carriageway covers
- Key lifter 5 / roller bar
- Water test
- Accessing a Primary Cross Connection Point

Correct lifting and manual handling techniques must be used when lifting covers, to prevent lids from dropping.

6.11 Communication

Partners will ensure effective communication of working arrangements / safe systems of work etc. with their employees, sub-contractors, BT/Openreach and members of the public.

Health, safety and environmental issues are to be discussed regularly and on the agenda of management meetings and briefings. Directors will be approachable on health, safety and environmental issues and encourage their staff to discuss such matters, showing their commitment through their behaviour and actions.

Partners must have established clear feedback systems to customers, and members of the public on safety issues. Arrangements will need to be in place for transferring health, safety and environmental incidents captured through this process into health and safety reporting.

Partners are also required to:

- Implement a meeting structure for the dissemination of health, safety and environmental information to all workers, indicating frequency, attendees and overall purpose of each meeting.
- Produce and deliver briefing material, with tracking of receipt or attendance.
- Communicate in a two-way process on health, safety and environmental matters at all levels of the organisation.
- Record communications issued to workers.
- Provide job related information to workers, including:
 - Site rules
 - Risks to health, safety and environment
 - Measures for reducing and controlling risk
 - Procedures to be followed in the event of an accident or other emergency

Persons at site must have a sufficient understanding of the English language to be able to deal with an on-site emergency, including contacting the emergency services and notifying the line manager.

If employees or sub-contractors first language is not English, the partner must have arrangements in place to ensure they can be put to work safely and understand safety related information.

6.12 Consultation

Partners shall have arrangements for consultation so that all levels of the organisation including subcontractors are involved in developing and continually improving the health and safety management system.

Where required, partners shall also consult with relevant stakeholders regarding the following:

- Inform other organisations who are working for or on behalf of them and brief their employees of any risks from work being undertaken and the necessary controls to be introduced.
- Co-operate with other organisations working in the same area regarding the implementation of control measures for the overall control of risk.
- Provide access to premises, worksites and employees for inspections and audits by organisations who may be affected by the partner's operation e.g. Highways Authority and Health and Safety Executive.
- Co-operate with CDM Duty Holders, whether undertaken by Openreach or other organisations: Client, Principal Designer, Designer, Principal Contractor and Contractor.
- Co-operate with others to enable each party to discharge their duties under the Health and Safety at Work Act and Management of Health and Safety at Work Regulations and any other relevant statutory duty.
- Identify how the partner engages with the wider build team to coordinate delivery of their service to, so far as reasonably practicable, safeguard the health and safety of those carrying out the work and those who are affected by the work.
- Have processes in place for the controlled issue of risk assessments, method statements, job packs and safety briefings and communications.

6.13 Damage and Asset Defect Reporting (including A1024 Process and BT Buildings Defects)

If damage, theft, or an urgent safety defect to Openreach's network is identified, it must be reported to the Network Repair team on **0800 1695098**.

The Network Repair Team is open 8am - 5pm, Monday to Friday. Outside of these hours, the call is forwarded to the out of hours control after a short message is played.

The A1024 process (Advice of Plant Requiring Attention) enables Openreach and its partners to report most plant, apparatus and equipment that have the potential to cause a safety hazard or a customer service failure.

For defects in BT buildings, faults are to be reported to the helpdesk: **0800 223388**.

The helpdesk will be able to deal with the call more quickly with the following information:

- Contact details including your UIN/PN.
- Building name, floor, and room number/exact location.
- Exact nature of query, or fault e.g. broken window, leaking roof, sticking door.
- Any security, safety or environmental issues.

This information helps the helpdesk prioritise work. There are four priority levels that determine how quickly faults should be fixed. They range from four hours for health and safety related incidents or service affecting faults, to 20 working days for general repairs.

6.14 Display Screen Equipment (DSE)

The partner must comply with 'The Health and Safety (Display Screen Equipment) Regulations 1992' in relation to workers who use DSE. The partner must consider that some workers may experience fatigue, eye strain, upper limb problems and backache from overuse or improper use of DSE and that these problems can also be experienced from poorly designed workstations or work environments. The partner must have arrangements in place to protect their workers from the health risks of working with DSE, such as PCs, laptops, tablets, and smartphones.

6.15 Driver Safety and Road Risk

Partners must have in place, arrangements to manage the risk to drivers and road users. These may include:

- Driver training
- Vehicle telematics
- Dash cams
- Driving hours controls
- Road risk procedure

- Vehicle maintenance procedures:
 - Servicing
 - Maintenance
 - Pre-use checks
- Road traffic collision reporting

6.16 Emergency Procedures

The partner must have arrangements to respond to emergencies.

Most BT buildings have written instructions for fire and bomb emergencies and in addition, some may also have specific instructions in case of flood, gas or other foreseeable emergencies.

The partner must have emergency procedures which include as a minimum:

- An emergency response plan covering emergency situations possible as part of the work undertaken, which may include serious injuries, explosion, flood, poisoning, electrocution, fire, release of radioactivity and chemical spills etc.
- Emergency contact list.
- Suitable equipment provision for use in the event of an emergency.
- Sufficient competent personnel e.g. fire marshals or first aid staff to respond to the emergency.
- Communication plan for the cascade of information of the plans and testing the effectiveness of such plans.
- First aid facilities.
- First aid competences.

6.17 Enforcement Notices

The partner is required to inform BT/Openreach of any enforcement action or notice issued by regulatory bodies, for example, Health and Safety Executive and Environmental Agency.

6.18 Equipment, Plant, Machinery and Vehicles

The partner must have arrangements in place to adhere to the 'Provision and Use of Work Equipment Regulations (PUWER) 1998', to manage the safe use of plant and equipment. Users of plant and equipment must hold the relevant industry qualifications.

All equipment, vehicles, plant and machinery used must be technically sound, fit for purpose, properly maintained, regularly tested / inspected and safe to

use in the intended application. Evidence of the partners' testing regime must be made available on request.

Health and safety of users shall be considered when purchasing plant, vehicles, equipment, raw materials or similar.

An Operator's Licence is to be in place for the operation of heavy goods vehicles (HGV).

6.19 **Civils Work and Excavation - Hazardous Pipeline Process (HPP)**

Openreach has specific procedures for working within 75 meters of hazardous pipelines.

All partners who undertake excavation activities on behalf of Openreach must implement a **'High Pressure Pipeline and Zone of Interest'** process, in accordance with the Openreach document **'Planning Excavations Including Hazardous Pipeline and Zone of Interest Process (HPP & ZOI) SFY/HSB/D053'** available on CANDID.

Prior to undertaking excavation works as a new partner, the HPP process will be subject to an assessment to determine its suitability. Only on successful completion of the assessment can the partner independently manage the flow of work from Openreach. Partners must notify Openreach if they are using a third party to undertake safe dig line searches. The HPP process will be re-assessed on an annual basis to ensure it remains current and up to date. Actions as a result of an assessment must be completed in accordance with the timescales agreed at the time.

Partners shall comply with the requirements of HSE guidance 'Avoiding danger from underground services (HSG47)', in relation to the use of utility plans, detection devices and safe digging procedures including hand digging trial holes to confirm the line and depth of services. Such arrangements shall be documented.

Partners shall have arrangements for the management of excavations, including those where support and temporary works are required. Where excavations are undertaken close to buildings, poles or structures, due regard must be taken of the additional loads and risks imposed.

Excavations must be in accordance with a site set up compliant with the New Roads and Streetworks Act (NRSWA) 1991, regarding signing, lighting and guarding.

Reasonable steps must be taken to prevent unauthorised access to excavations, including trespassers. Any excavated material must be stored on tarpaulins or canvas sheeting to prevent any hazardous material contaminating the surrounding area.

All breaches of the HPP process and HPP near misses shall be reported immediately via the reporting process as described in section 6.1.1.

6.20 Fatigue

Fatigue refers to the issues that arise from excessive working time or poorly designed shift patterns. Fatigue is a perceived state of 'weariness' caused by prolonged or intensive exertion. Fatigue results in slower reactions, memory lapses, absentminded slips and lack of attention etc.

The partner must minimise the risk of workers not being able to discharge their duties safely due to fatigue, including adhering to the 'The Working Time Regulations 1998'.

The arrangements shall include but should not be limited to:

- Identifying the activities and tasks where fatigue could result in impaired performance and increased operating risk.
- Undertaking fatigue risk assessments.
- Planning work so that exceedances are not required e.g. alternating shifts, setting limits on working hours, overtime and shift swapping, workload planning, breaks and regular risk assessing.
- Risk assessing unforeseen exceedances.
- Monitoring hours worked.

6.21 First Aid

Partners shall complete a first aid needs assessment in accordance with the 'Health and Safety First Aid Regulations 1981', to determine appropriate arrangements, which is to include the number of first aid trained personnel required, training and equipment.

6.22 Hazardous Substances

In accordance with 'Control of Substances Hazardous to Health (COSHH) Regulations 2002', partners must have arrangements in place to manage the risk of hazardous substances, including:

- Minimising risk by exploring safer alternative products.
- Use of material data safety sheets to prepare COSHH assessments.
- Training in the use of hazardous substances.
- PPE required.
- Health surveillance.
- Storage of hazardous substances.

- Use of bunds and drip trays to catch spills.
- Disposal of hazardous substances in accordance with the mandatory '**Openreach Supplier Environmental Policy – SFY/HSR/A009**', available on CANDID.

6.23 Health & Wellbeing

Partners shall have arrangements in place to assess and support the physical and mental health of their workers.

These shall include:

- Identification of health issues.
- Risk assessing health issues and the impact on individuals.
- Occupational health support.
- Understanding any medical conditions of workers before they begin employment.
- Routine health surveillance.

6.24 Hot works

'Hot work' includes any process that generates a source of ignition e.g. naked flames, heat, sparks arising from working methods such as welding, flame cutting, grinding and using disc cutters. The partner shall have arrangements in place for the safe management of hot works.

6.25 Housekeeping

Partners shall have arrangements in place for good housekeeping at work sites e.g. general care, cleanliness, orderliness, tidiness and maintenance. Work sites must be kept clear of unnecessary plant, equipment and materials, with anything not in use, confined to a safe place or in vehicles. Sites shall be free from slip, trip and fall hazards, with a clear working and storage areas.

On completion of work, sites must be cleaned and tidied and waste disposed of in accordance with the mandatory '**Openreach Supplier Environmental Policy – SFY/HSR/A009**', available on CANDID.

6.26 Internal Cabling and Fire Stopping

Partners that drill holes through walls e.g. multiple dwelling units (MDUs) must have a documented safe system of work.

Any breach between compartments (rooms or other separated areas, including walls, floors and ceilings) must be made good to the appropriate standard.

Temporary fire-stopping arrangements must be in place for any significant breach left unsupervised. In England and Wales, partners must conform to 'The Regulatory Reform (Fire Safety) Order 2005' and in Scotland, the requirements on general fire safety which are covered in 'Part 3 of the Fire (Scotland) Act 2005', supported by 'the Fire Safety (Scotland) Regulations 2006'.

Cables shall be adequately supported utilising the approved fire retardant supports (such as metal cleats, cable ties, butterfly clips etc.) which are compliant with 'British Standards 7671 Requirements for Electrical Installations. IET Wiring Regulations'.

All work undertaken in and around multi dwelling units or multi occupancy units shall conform to the 'Building Regulations 2022'.

6.27 Lifting Operations and Lifting Equipment (LOLER)

Partners must have arrangements to adhere to 'Lifting Operations Lifting Equipment Regulations (LOLER) 1998', including:

- Planning the lift, including lifting plans.
- Competent personnel e.g. Lift Supervisor, Appointed Person and Slinger / Signaller.
- Appropriate supervision.
- Maintenance and inspection of equipment including Thorough Examination

Where partners use BT/Openreach owned lifting equipment and accessories, including work restraint systems associated with lifting operations, they will first obtain confirmation of its up-to-date statutory inspection and test status.

6.28 Lone Working

Partners must have arrangements in place to manage the risk to lone workers including:

- Risk assessment to determine who is lone working, the hazards involved and control measures.
- Supervision
- Communication
- Emergency processes

When lone working at third party premises, an assessment must be made to determine how the work will be undertaken safely, considering any premises' specific controls.

6.29 Manual Handling

Partners must have arrangements in place to protect workers from the risk of injury from manual handling in accordance with the 'Manual Handling Operations Regulations 1992'. This is to include:

- Avoiding hazardous manual handling, so far as is reasonably practicable.
- Assessing the risk of injury from any hazardous manual handling that cannot be avoided
- Reducing the risk of injury from hazardous manual handling to as low as reasonably practicable

6.30 Noise and Vibration

Partners must have suitable arrangements for compliance with the 'Control of Vibration at Work Regulations 2005' and 'The Control of Noise at Work Regulations 2005'. These are to include:

- Workplace design for reduced noise exposure
- Selection of tools and machinery
- Purchasing equipment that minimises exposure and ensure that it is well maintained
- On site measurement of noise and vibration
- Limiting exposure duration
- Personal Protection Equipment
- Information, instruction and training
- Health surveillance

6.31 Permit to Work

A 'permit to work' is a more formal system stating exactly what work is to be done and when, and which parts of the activity are safe. A responsible person should assess the work and check safety at each stage. The people undertaking the work, sign the permit to show that they understand the risks and precautions necessary.

Partners shall have a permit to work system in place for the following activities.

- Hot work (including use of electrical welding equipment)
- Confined spaces
- HV electrical work

- LV electrical work adjacent to live equipment
- Work on pneumatic / hydraulic / pressure systems
- Work above ground near unprotected edges
- Work with lasers

6.32 Personal Protective Equipment (PPE)

Partners will provide their own PPE in accordance with 'Personal Protective Equipment at Work Regulations 2022'.

Any on site specific PPE rules will be adhered to.

PPE must as a minimum be appropriate for the task, provide the necessary level of protection and considered a last resort where risks can't be controlled by other practical measures.

Partners shall ensure that:

- Risk assessment determines specific task PPE required.
- PPE is issued when starting work and following loss or damage.
- Condition and suitability of PPE is actively monitored.
- Storage of PPE is provided to protect it and keep it clean.

6.33 Poling Operations and Pole Stack Management

Partners undertaking poling works shall have suitable arrangements for both mechanical and manual poling operations.

Partners shall ensure that poling operatives:

- Undertake a site-specific risk assessment prior to commencing work.
- Have the necessary training and Smart Awards accreditations.
- Are appropriately supervised.
- Undertake a full examination and risk assessment of the pole as per '**Working On the Overhead Network – SFY/HSB/D040**', available on CANDID.
- Identify overhead power cables in proximity to the works. Partners shall ensure that a robust procedure for managing power conflicts and joint user poles is in place and observed.
- Use a safety harness / pole belt (in addition to all other relevant PPE) to the appropriate point of the pole at all times.
- Climb poles using a ladder safety system in accordance with section 6.44.1.

- Handles and erects poles using appropriate mechanical and manual means.
- Is aware of and understands the health risks from creosote and procedures in place to protect against them.
- Observes and is aware of the Openreach poling minimum standards e.g. overhead wire heights, stepping rules (details of which can be found on CANDID).
- Completes and returns the mandatory poling records update, which notifies Openreach every time partners either add to the network, replace in the network or recover poles from the network.

Partners and subcontractors must ensure that their pole stacks are properly maintained and managed in accordance with the mandatory '**Openreach FND Poling Teams Pole Stack Management Policy and RACI**' available on CANDID.

6.34 Pressure systems

Partners must have arrangements in place to minimise the risks when working with systems or equipment which contain a liquid or gas under pressure in accordance with the 'Pressure Systems Safety Regulations 2000'.

6.35 Construction Design and Management (CDM) 2015

The work undertaken on behalf of Openreach falls under the 'Construction (Design and Management) Regulations 2015' and therefore partners shall have arrangements in place to undertake any Duty Holder roles to which they are appointed: Principal Designer, Designer, Principal Contractor and Contractor. Partners' ability to undertake the Duty Holder roles will be determined in accordance with **Openreach Construction Design Management (CDM) 2015 Regulations Licensing Scheme – SFY/HSR/C031**, available on CANDID.

If performing the Principal Contractor role, partners will utilise their own project management documentation including Construction Phase Plan induction, site rules etc.

6.36 Temporary Works

Partners must comply with the 'British Standard BS5975:2019 Code of Practice for Temporary Works Procedures and Permissible Stress Design of Falsework', when designing, implementing and managing temporary works.

6.37 Risk Assessment and Method Statements / Safe systems of work

Partners shall conduct suitable and sufficient risk assessments of their work activities and have documented arrangements in place for the management of risk and the controls to reduce the risk, including method statements. This includes:

- A register of key safety critical risks and associated controls.
- Assessment of the risks.
- Identifying the control measures already in place.
- Identifying possible additional control measures required.
- Preparation of risk assessments, with appropriate controls, communicated to and understood by the workers.
- Documented method statements / safe systems of work communicated to and understood by the workers.
- On site point of work risk assessments.
- Quantification of the environmental risk.
- Production and management of an environmental impacts and aspects register.
- Undertaking periodic reviews of risk assessments and method statements and updating where required e.g. incorporating the outputs of the hazard identification process or following incidents.

6.38 Putting People to Work

Partners must have arrangements for putting people to work safely, which shall include:

- Job pack
- Task instruction
- Utility plans
- Risk assessments
- Method statements
- Streetworks permit requirements where applicable

6.39 Streetworks

Partners will comply with 'New Roads and Street Works Act 1991' whenever working on the public Highway. This includes rules regarding training, noticing / permits and authorisation and signing, lighting and guarding.

Partners will complete appropriate risk assessments before any work starts on public Highways.

The risk assessment will include:

- The type of service planned.
- Hazards along the route and any physical constraints.
- Survey requirements.
- Underground services in the vicinity of any cable routes or poles.
- Traffic flow and pinch points.
- Traffic and population density.
- Local authority rules.
- Access / egress routes for plant, people and materials.
- Pedestrian and traffic management.

Workers shall be subject to regular street works safety briefings. Partners shall ensure appropriate supervision of street works with a documented monitoring process are in place.

6.40 Sub-contracting

Partners that subcontract any elements of their work, must only do so if in accordance with their contract with BT/Openreach. Where partners do subcontract, they must have a documented process for the appropriate selection, approval and on boarding, including evaluation of their suitability and capability.

Partners maintain responsibility and accountability for any subcontracted work. Investigation of any safety incidents involving subcontractors will be owned and investigated by the partner.

Subcontractor employees shall be registered with Smart Awards in the same way as partner employees, as per section 6.3.

Partners are responsible for the monitoring of subcontractor performance and will include performance data in their monthly report submissions.

Partners shall ensure that appropriate supervision of subcontractors is undertaken.

6.41 Supervision

Partners must have arrangements to ensure all workers receive the appropriate level of supervision.

Supervisors and line managers must be adequately trained to supervise the tasks their people undertake.

Competence of supervisors and line managers shall be determined and evidenced.

Supervisory arrangements shall include:

- Ratios of direct labour supervisors to employees (this ratio will exclude sub-contractor supervisors but include sub-contractors' employees). The ratios of supervisors must ensure practicable geographical layout for travel purposes so they can adequately support their people.
- Frequency of on-site monitoring including documented requirements for recorded monitoring and actions to manage gaps.
- Management of insufficient monitoring against recorded requirements.
- Identification of on-site non-compliances and remedial and preventative action.
- Identification and management of on-site non-compliance trends.

6.42 Tree Cutting and Forestry Work

Partners engaging in tree cutting, arboriculture and/or forestry work shall be full members of the 'Arboricultural Association Approved Contractor Scheme' (AACS).

Operators of both rear handled and top handled chainsaws must be competent under the 'Provision and Use of Work Equipment Regulations (PUWER) 1998' as demonstrated by the achievement of an appropriate national competence award. They should also be trained and competent with industry best practice as advised by the 'Arboricultural Association' in the following health and safety guides:

- AFAG 402 Aerial Rescue
- AFAG 403 Mobile Elevating Work Platforms
- AFAG 801 Noise and Hearing Conservation
- AFAG 802 Emergency Planning and First Aid
- AFAG 804 Electricity at Work: Forestry & Arboriculture

Appropriate Personal Protective Equipment (PPE) must be worn by any person using a chainsaw.

Climbers shall work in accordance with AFAG401 'Tree Climbing Operations' and ground workers, FISA301 'Petrol Driven Chainsaws'.

Partners must ensure that all necessary environmental checks and documentation has been completed before any tree cutting or pruning takes place. Permission must be granted by the landowner and if the tree is in a conservation area (Northern Ireland and Wales) or has a Tree Protection order (UK wide).

6.43 Threatening and Violent Behaviour Towards Workers

Partners must have arrangements to manage threatening and violent behaviour towards workers, including:

- Measures to reduce the likelihood e.g. risk assessment when working in areas known to be potentially problematic.
- No lone working in areas known to be potentially problematic.
- Employee assistance to support in the event of such behaviour.
- Emergency response arrangements.

6.44 Work at Height

Partners must comply with the 'Working at Height Regulations 2005', including:

- Avoiding work at height where it is reasonably practicable to do so.
- Where work at height cannot be avoided, prevent falls using either an existing place of work that is already safe or the right type of equipment.
- Minimise the distance and consequences of a fall, by using the right type of equipment where the risk cannot be eliminated.

Appropriate rescue from height measures shall be in place, including a documented response plan. This will include, but is not limited to:

- Dedicated rescue trained operatives
- Approved designated rescue equipment
- Documented process and procedure for rescuing
- Rehearsed, tested, and reviewed on regular basis

Except for travelling and fixed ladders were permitted to do so by BT/Openreach, partners must not use BT/Openreach access equipment.

Working at height will be subject to risk assessment, considering as a minimum:

- Fragile surfaces
- Risk of people falling
- Risk of falling objects
- Access equipment – type / inspection regimes / measures to prevent unauthorised use
- Overhead electricity apparatus
- Radio Frequency / Electric and magnetic field (EMF) hazards

6.44.1 Ladders

Use of ladders is only acceptable where:

- The ladder selected is suitable for the intended task.
- Work is short duration (work in one position does not exceed 30 minutes).
- The activity is deemed to be 'light' work.
- Three points of contact can be maintained at all times.
- The ladder can be stably positioned on suitable firm ground.

Including when accessing buildings at height and climbing poles, ladders must be fixed to the structure and with a fall restraint system is in place that prevents the climber becoming detached while ascending and descending. Openreach deploys the 'Tetra' ladder safety system and partners shall utilise a system that is at least equivalent to Tetra.

6.44.2 Mobile Elevated Work Platforms (MEWPs)

Partners utilising MEWPs shall ensure that operators hold the appropriate training and accreditations, in accordance with the Openreach skills matrix. Operation of a MEWP will always be with a trained and competent ground support person present.

Use of MEWPs shall be in accordance with a documented safe system of work. Where applicable, this shall include specific controls for:

- Work taking place in the vicinity of free-flowing water.
- Operation within the vicinity of low voltage and high voltage electricity. This is to include the "Safe Sector" method of MEWP deployment, in accordance with document 'SFY/HSB/D039 O/H Network using a Mobile Elevating Work Platform available on CANDID.

A documented rescue plan shall be in place for MEWP operation, which is to include descent of a person to ground level in the event of an emergency. Relevant operatives, supervisors and managers are to be trained in the rescue process.

All MEWPs must carry or have access to a fuel spill kit.

All MEWP's must have either a rated insulation or inferred insulation (bucket is non-metallic / GRP) when working in the vicinity of electricity apparatus.

6.44.3 Scaffold

Scaffolding shall be erected by competent persons and inspected before being brought into use. A register of inspections will be maintained.

Partners undertaking tube and fitting scaffolding shall be members of the 'National Access Scaffolding Confederation (NASC)' and the work will be undertaken in accordance with 'TG20:21 The good practice guidance for tube and fitting scaffolding'.

For mobile tower scaffolding works, the partner shall be affiliated to 'Prefabricated Access Partners' and Manufacturers Association' (PASMA)'.

A documented rescue plan shall be in place for working on scaffolds, which is to include descent of a person to ground level in the event of an emergency.

6.44.4 Roof Work including Residential Flat Roof

Partners undertaking work on roofs must have arrangements for roof access. Where roof access is to be undertaken on BT/Openreach owned buildings, arrangements will be agreed with the BT company representative,

The partner will ensure they are aware of any radio frequency hazards on roof tops and implement appropriate measures.

Where work is to be undertaken on flat roofs for single storey residential premises, the partner shall utilise an approved work restraint and fall arrest mechanism. The work shall be completed as per the **SFY/CSP/A504 Single Storey Flat Roof Access** document, available on CANDID.

Work platforms must be erected and used by competent persons.

When working at or near unprotected edges, appropriate fall prevention measures will be in place, for example, work at or near loading bay doors.

6.44.5 Working in the Vicinity of Overhead Electricity

Openreach uses the following definitions when planning safe systems of work for work near overhead electricity:

- Low voltage relates to voltages at or below 1000 volts alternating current (ac) or 1500 volts direct current (dc).
- HV is any voltage above LV, and may be transmitted on wooden pole routes, or steel towers (voltages greater than 33,000 volts are normally carried on steel poles or towers).

When working in the vicinity of overhead electricity, the minimum clearances from apparatus that shall be maintained are as per table 1 below:

Table 1: Overhead minimum clearance distances

Voltage	Classification	MINIMUM clearance distance
Low voltage (up to 1kV)	LV	1 metre
Above LV to 33kV	HV	3 metres
132KV	HV	6 metres
275 & 400kv	HV	7 metres

If these distances cannot be maintained, the Distribution Network Operator (DNO) must be contacted, and an approved method of work agreed.

6.44.6 Working In The Hours Of Darkness (WITHOD)

It is acknowledged that working in the hours of darkness or other low ambient light conditions presents potential risks beyond those encountered in normal daylight hours. Consequently, there is a requirement that any partner who is required to undertake work in these situations must have in place and follow a stringent safe system of work. This may include, but is not limited to:

- Classes of work to be ceased in these conditions
- WITHOD pre-work site survey
- Task specific risk assessment
- Operatives trained to work in low light conditions
- Use of appropriate overhead floodlighting
- Consideration of both overhead and underground utilities
- No lone working

6.45 Working at High Security/Safety Sites

Partners may be required to undertake work at security or safety sensitive sites including airports, railways (including trackside), Ministry of Defence, Government establishments, energy generating installations, chemical plants and other premises or industrial sites.

Partners shall comply with vetting, safe systems of work or other requirements specified by the third-party site agents.

6.46 Working Near Rail and Guided Transport Systems

Works undertaken within the vicinity of rail, on rail property, or near a guided transport system shall be appropriately planned. No such work is to commence until all the relevant authorities and operators have been contacted and a safe method of work has been agreed.

If work being undertaken will impact upon rail assets, it is the responsibility of the partner to have in place a documented policy and process for safe delivery of the work. This will include:

- Owner of process.
- Designated staff and supervision.
- A robust method of validating work.
- Communication with all relevant bodies (BT/Openreach included) and how all data will be recorded.
- Designated staff to lead application, planning and putting workers to work.
- Planning alternative routes.
- Job pack requirements.
- On site specific risk assessment.
- Training and awareness.

The partner will be responsible for engaging with Network Rail and making any payments following BT/Openreach approval of cost. Openreach will authorise the cost and sign the Basic Asset Protection Agreement (BAPA) if required.

When on Network Rail land, as per (Safety at Streetworks and Road Works A Code of Practice) partners shall engage with Network Rail Asset Protection teams (ASPRO) regarding:

- Works at or near railway level crossings.
- Works over and under railways.
- Works adjacent to railways.

6.47 Working Near Water

Working near water is defined as:

- Working within five metres of an external body of water or an area deemed likely to imminently flood.
- Working within 1 metre of a body of water in an internal environment, for example, a flooded cable chamber or flooded basement.

- Working in any other location from which someone could fall into a body of water.

A body of water is defined as water which is of a depth or flow that would cause the person, if immersed, to either: 1) get into difficulty or, 2) not be able to get back out easily unaided. This includes bodies of water such as quays, docks, marinas, lakes, ponds, canals, rivers, or any location near significant quantities of water.

Partners may be impacted by working near water during tasks such as:

- Accessing or surveying poles, cabinets, joint boxes, and ducts which are located near to water.
- Providing or maintaining service to water-based customers (e.g. houseboats).
- Overhead plant which crosses a body of water.
- Work near flood water.

The most immediate danger is drowning. Factors which can contribute to this include:

- Shock from suddenly dropping into cold water.
- Weight of waterlogged clothing.
- Lifejackets not being worn or failing to inflate.
- Incapacity following injury e.g. hitting something during a fall or whilst in the water.
- Fatigue or hypothermia where rescue is difficult or not immediate.

The minimum standards for working near water are:

- Work near water must be avoided wherever reasonably practicable. Reasonably practicable means the risk must be weighed against the time, money and trouble needed to control it.
- Where work near water cannot be avoided, only people who are fully trained in working near water are permitted to work near water. Anyone who has not received specific and up to date working near water training, is strictly prohibited from working near water.
- For people who are fully trained in working near water, the following rules must be followed:
 - Prohibited activities:
 - Never enter a body of water.
 - Never work within 5m of rough tidal conditions, or fast flowing non-tidal conditions.

- Never work within 5m of a body of water where there is the presence of electricity, contaminated water, or rising water level.
- Working near water should be the last resort and should only be done when the work cannot be avoided.
- Before working near water, a suitable and sufficient risk assessment must be carried out and documented by the fully trained person undertaking the work.
- Lone working near water is strictly prohibited.
- When planning work, planners must avoid any new joints, nodes, boxes, poles, cabinets etc. within 5 metres of a body of water.
- If working near water can't be avoided, and other solutions have been ruled out, the potential for workers to fall into or be trapped by water shall be minimised.
- Those working near water shall be appropriately trained, instructed and supervised.
- Job packs must include risk assessments, hazard sheets and received or known information regarding work locations.
- Workers who work near water shall be suitably trained to as a minimum, DFERA level 1 or equivalent and deemed competent by the partner.

6.48 Water Testing

A water test shall be undertaken prior to any water pumping from the underground network.

If polluted water is observed, appropriate action must be taken. The outflow from the water pump must be monitored.

Failure to comply with this requirement may result in prosecution by the Environment Agencies or other equivalent regulatory bodies responsible for waterways and may result in additional constraints being imposed on operations concerning discharge of water into drainage systems.

The Environment Agency (EA) is responsible for the protection of 'controlled waters', which includes all watercourses and water contained in underground strata. It is an offence under the Water Act 2003 to cause pollution to such waters.

6.49 Welfare Facilities

Responsibility for providing welfare facilities depends upon what is stated in the contract with BT/Openreach and whether partners have been formally

notified as Principal Contractor under CDM 2015 regulations. The arrangements shall be in accordance with the 'Workplace (Health, Safety and Welfare) Regulations 1992' and The 'Construction Design and Management (CDM) Regulations 2015'.

Welfare facilities shall include the following as a minimum:

- Drinking water.
- Washing facilities.
- Toilets
- Rest and changing facilities.
- Somewhere clean to eat and drink during breaks.

Consideration should be given to increasing cleaning frequencies or where there are large numbers of people or limited facilities, providing portable facilities.

Consideration shall be given to:

- Expected work duration (including 'door to door' travelling time).
- Size and location of site.
- Type of work to be undertaken.
- Number of people involved in the work.

Particular attention should be given to provision of mobile facilities at transient work sites where fixed public facilities are not reasonably accessible.

6.50 Environmental Management

Openreach is committed to the prevention of pollution and minimising the impact of its operations on the environment. Openreach operates to the BT Group Environmental Management System (EMS) which provides a framework for the management of the environmental impacts and supports BT Group compliance to ISO 14001.

Work on behalf of Openreach will be in accordance with '**Openreach Supplier Environmental Policy**', available on CANDID. Failure to comply with this policy could lead to environmental damage and penalties imposed on the partner by regulatory authorities.

The partner shall therefore have arrangements to manage their impact on the environment and comply with appropriate environmental legislation, including:

- Environmental Protection Act 1990 (Inc. duty of care for waste)
- The Town and Country Planning Act 1990
- Wildlife and Countryside Act 1981
- Water Resources Act 1991

Failure to comply with legislation could lead to environmental damage and penalties imposed on the company or the individual by the regulatory authorities.

6.51 Waste Disposal

All waste shall be managed and disposed of in accordance with '**Openreach Supplier Environmental Policy**', available on CANDID. Partners shall only use Openreach waste facilities if approved in writing. The only exception is the disposal of all loose cable which must be disposed of in a cable skip at BT/Openreach premises or in a cable skip supplied to the partner by Openreach or its approved cable recovery supplier.

6.52 Fuel Spills

Spillages and leaks of fuel or other hazardous substances can cause serious pollution. If they enter drainage systems, surrounding ground or water courses, they can have a long-term negative impact on the environment.

Partners shall have arrangements to reduce the risk of leaks and spills of hazardous substances and take action to minimise the environmental impact of any accidents that happen.

Vehicles that carry fuel, oil, machinery, or other hazardous substances must carry a spill kit and employees must be trained on their use. Any item used to clean or contain any spill or leak must be disposed of as hazardous waste in accordance with '**Openreach Supplier Environmental Policy**', available on CANDID.

6.53 Protected Species

Consideration shall be taken when working near protected areas, species, and wildlife.

The following areas are protected, and work shall be undertaken in accordance with environmental legislation and permit or licence conditions:

- National parks
- Areas of outstanding natural beauty (AONB)
- Sites of special scientific interest (SSSI)
- Special areas of conservation (SAC)
- Special Protection Areas (SPA)
- Ramsar wetlands
- European Protected Species
- Marine Conservation zones

Partners shall also abide by UK laws on protected species including but not limited to:

- All species of bats
- Great crested newts
- Hazel or common dormice
- Otters
- Wild Birds
- Badgers
- Dormice
- Newts
- Natterjack toads
- Reptiles (some species)
- Protected plants
- Large blue butterfly
- Sturgeon

6.54 Managing Health, Safety and Environmental Underperformance

Openreach uses a number of factors to determine partner health, safety and environmental performance, including:

- Incident and event reports and frequency rates.
- Street works defects and prosecutions.
- Management of works within Zone of Interest.
- Utility damages.
- Accreditation compliance.
- Quality of investigation reports.
- Timescales for closure of investigation reports.
- Response to requests for information.
- Performance compared to other partners.
- Performance compared to Openreach.
- Results of pre-capability, in life, change of scope and high-pressure pipeline assessments and timescales to complete actions.

Where the partner's performance does not meet the required standards, and / or Openreach identifies that the partner is in breach of any process or policy

outlined within this document, a number of options will be considered for implementation by Openreach, including:

- Issue of an improvement plan for the partner to comply with.
- Partner to produce an improvement plan.
- Individuals removed from Openreach works.

Where Openreach considers that the partner's underperformance significantly compromises health, safety, or environmental compliance and / or Openreach identifies that the partner is in breach of any process or policy outlined within this document, the following additional options will be considered, at a combination of regional or national level:

- Introduction of 100% supervision by Openreach.
- Compliance checks/audit undertaken by the partner, with evidence and timescales agreed by Openreach.
- Openreach to deploy targeted auditing programme with the partner covering costs.
- Stand partner and / or their subcontractor(s) down.
- Utilise direct labour capability in place of partner resource.
- Work allocated to an alternative partner.
- Remove partner or sub-contractor from contract either temporarily or permanently.

Removing a partner from Openreach works will be undertaken in accordance with '**SFY/HS/A010 - Supplier Stop Works Procedure**', available on CANDID.

Additionally, Openreach may intervene to identify any failures and implement remedial actions. This will be re-charged to the partner under '**SFY/HS/C032 Openreach Fee For Intervention (OFFI)**', available on CANDID.

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