



HEALTH AND SAFETY POLICY & PROCEDURES MANUAL

ENGLISH TOURING OPERA

Opera
that
moves

**English Touring Opera
Mountview,
120 Peckham Hill Street,
London
SE15 5JT**

Completed in compliance with

The Health and Safety at Work etc. Act 1974 and
The Management of Health and
Safety at Work Regulations 1999

Reviewed - September 2024

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1.0 Policy Statement

English Touring Opera (ETO) is committed to protecting the Health and Safety of all its employees, including freelancers, volunteers, project participants and all others with whom our work brings us into contact.

The company's policy is to:

- provide and maintain a safe and healthy place of work
- provide adequate information, instruction, training and supervision
- provide and maintain plant and equipment and safe systems of work
- ensure safe access to and from the places of work
- work to prevent accidents and work-related ill health.

The company recognises its responsibilities under the Health and Safety at Work Act and other related legislation and seeks to satisfy its obligations by adopting this Health and Safety policy.

The Company will:

- Strive to meet statutory health and safety legislative requirements as a minimum and work to industry best practices.
- Consult with employees regularly on health and safety matters.
- Implement emergency procedures in cases of fire or other significant incidents.

All employees/freelancers are:

- Expected to take reasonable care for the health and safety of themselves and others affected by their work activities, and to co-operate as appropriate to enable them to perform their duties in a safe manner.
- Follow control measures identified in risk assessments and safe systems of work.
- Report any hazards, incidents, near misses, or accidents which have caused or may cause injury or damage to property.
- Not intentionally interfere with or misuse equipment provided by the Company in the interests of health, safety, and welfare.

This policy will be reviewed annually to ensure compliance and revised if necessary to account for any organisational or legislative changes or more frequently if there are significant changes in the work practice.

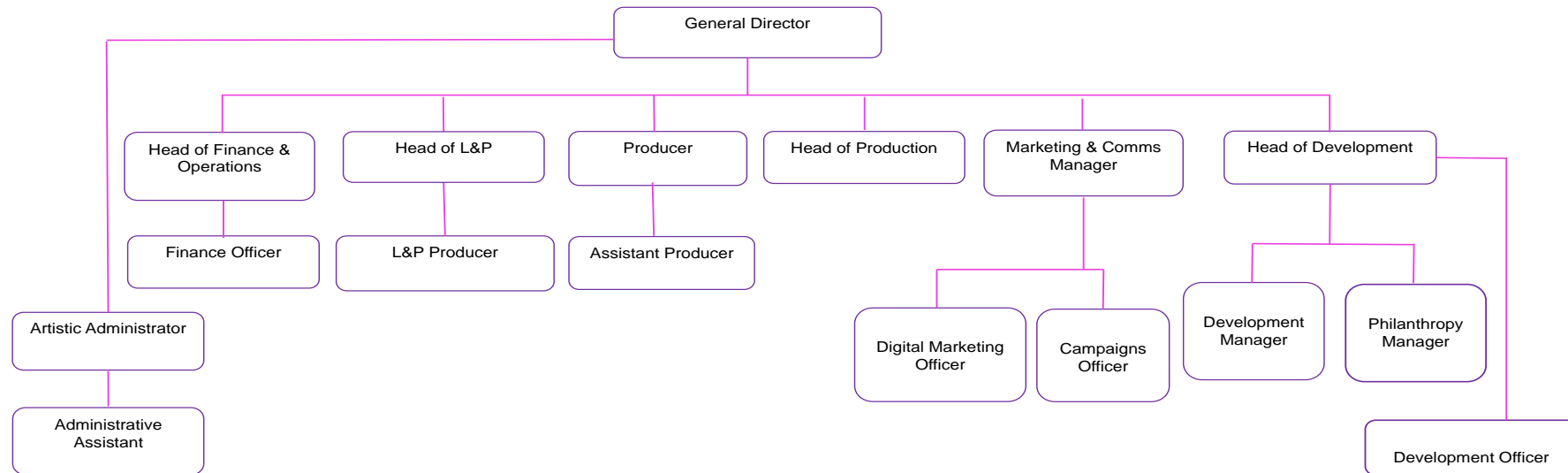
Signed.....
(Director)

Date.....

2.0 ETO Management Structure

This chart identifies the responsibilities and communication lines for health, safety and welfare.

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3.0 Individual Responsibilities for Health and Safety within ETO

3.1 Directors

The Directors have a key role in promoting a positive health and safety culture within ETO. It is crucial that the organisation, planning and implementation of health and safety management are effective.

The final overall responsibility for the safety and well-being of the staff rests with the Board of Directors.

Therefore, the Board will be responsible for:

- Deciding policy, strategy and ensuring compliance in line with statutory obligations.
- Ensuring adequate resources are made available to enable ETO to meet both statutory requirements and the requirements of the ETO Health & Safety Policy.
- Ensuring Health and Safety Policies are properly developed, reviewed and implemented.
- Ensuring Health and Safety matters are being effectively co-ordinated and communicated throughout the organisation.
- Ensuring that all Managers and duty holders identified under this policy understand and discharge their health and safety responsibilities and systems are in place to monitor their performance.

The day-to-day management of the policy has been delegated to the General Director.

Responsibility for ensuring the welfare and safety of the company on tour will be delegated to the Head of Production.

The company believes that co-operation and consultation with all staff members is essential, and all staff members are to be made aware of their responsibilities.

Implementation

Successful implementation of this policy requires the support and co-operation of all ETO Company staff. In particular, employees must accept responsibility for their health and safety and the health and safety of others who may be affected by their actions, as laid down in section 7 of the Health and Safety at Work Act.

ETO will, therefore, regard any breaches of this policy, including instructions and procedures listed elsewhere but still forming part of this policy, as misconduct and subject to disciplinary action.

3.2 General Director

The Health and Safety at Work Act 1974 requires that both the employer and the employee bear responsibility for health and safety. The responsibilities accepted by the Board of Directors is delegated via the General Director who has overall responsibility for the following aims:

1. ETO will ensure safe and healthy working conditions are provided where staff and others working on behalf of ETO are required to work, and wherever other people are affected by work carried out by ETO.
2. That all equipment and facilities used by ETO are designed, constructed, maintained and used in such a way as to minimise personal injury or damage to health.
3. ETO will ensure employees are adequately trained for the work they are required to do and are informed of any hazards to health and safety arising from this work, as well as those who may be affected by the work being carried out.
4. The responsibilities of the General Director for Health and Safety can be delegated to other members of staff with regard to the day-to-day operation of the company.

3.3 Head of Production

Responsibility for ensuring the welfare and safety of the company on tour will be delegated to the Head of Production.

Their responsibilities are stated in ETO's Code of Practice for Health and Safety Demonstrations for Performers and Stage Management, located in the Health and Safety Policy folder on the server.

They will also ensure that all company members have access to relevant information provided by the venue with regard to health and safety.

Touring nominated responsible persons as detailed in **Appendix A**.

3.4 Heads of Department (HOD)

Heads of Departments are responsible for ensuring that health, safety and environmental issues are managed within their area of responsibility, and that the health and safety policy and procedures are implemented.

The responsibilities include;

- Conducting risk assessments, including manual handling, COSHH, DSE, and other control measures to reflect the risks under their control.
- Ensuring all staff, visitors or anyone else in the work area receive adequate information, instruction and where necessary training.
- Ensuring that all staff under their control understand their responsibilities.
- Investigation of accidents and incidents and ensuring that these are recorded and reported.
- Inspection of all areas under their control to ensure safety measures are being maintained and all safety instructions and safe systems of work are being followed.

- Ensuring any contractors working in their area are aware of all safety precautions.
- Ensuring all equipment is maintained, guards are in place and used.
- Provision of Personal Protective Equipment (PPE) and ensuring that it is used effectively.
- Maintaining all areas under their control in a safe manner to protect all employees and others in the area as far as is reasonably practicable.
- Arranging appropriate training for their staff so that they can carry out their tasks in a safe manner.
- Maintenance of records to demonstrate compliance with procedures.

3.5 General Duties and Responsibilities for the Employees/Freelancers

All Employees (including freelancers' temporary workers and volunteers) irrespective of the status within the organisation must:

- Take reasonable care for the Health and Safety of themselves and of other people who may be affected by their acts and / or omissions at work.
- Co-operate on matters of health and safety with their employer, or any other person who has a duty or responsibility under health and safety legislation or our policies, in order that all duties and responsibilities can be carried out.
- Not, either intentionally or recklessly, interfere with or misuse anything provided in the interest of health and safety.
- Ensure that they report any work-related accidents or incidents, which involve staff or customers by completing the ETO accident reporting form in line with this procedure.
- Report any other workplace safety concerns to their line Manager so that action can be taken to eliminate or manage the risk.

3.6 Contractors and Self Employed

ETO has occasion to engage outside contractors and self-employed Persons (Contractors) to perform certain work. All contractors and other persons will be expected to comply with the Company's Health and Safety Policy and any Codes of Practice issued from time to time and will be issued with a copy of the Company's Health and Safety Policy Statement.

ETO have an approved contractor vetting system which vets all contractors prior to appointment ensuring they have suitable and sufficient resources and safety systems in place to carry out their activities. During the vetting process the Contractor will be asked a series of questions, asked to produce a variety of health and safety documentation including (list not exhaustive):

- Risk assessments
- Selection and use of work equipment
- CoSHH data
- PPE arrangements
- Training

Contractors who cannot provide evidence of good practice will not be approved.

Contractors will be expected to work in a safe manner under the supervision of an ETO representative ensuring that:

- Provision is made for the health and safety not only of themselves, ETO Employees, but also that of visitors.
- All plant, equipment and machinery brought onto the premises is checked by ETO representative.
- All plant, equipment or machinery will be in good working order, safe to use, fitted with any guard or other necessary safety devices. Information on the noise levels produced by that plant, equipment or machinery might be requested by the ETO representative.
- Consideration should be given to the use of all power tools or electrical equipment of greater voltage than 110 volts without prior permission of the Technical Stage Manager/Production Electrician or ETO representative. Where possible all power tools will be battery operated. All transformers, generators, extension leads, plugs and sockets must conform to British or European Standards, and be in good condition.
- Contractors must conform to workplace instructions, report any incidents to the person in charge of the workplace and co-operate with the Company to ensure compliance with legislation.
- Suitable welfare facilities, including first aid facilities, will be provided for Contractors when required. Any necessary documentation will be completed in all cases by the appropriate ETO representative.
- All materials, substances, and those (dusts, fumes etc) produced in the course of the work must be assessed. All risks will be assessed as necessary. All operatives of contractors will wear personal protective clothing and equipment, as identified by the Assessments, and will be monitored by the relevant ETO representative.

3.7 Visitors to Office and other locations

All other persons, including the resident production staff, artists, musicians and all other persons visiting the locations (Producers representatives, Local Authority Inspectors, etc.), are to sign in the log provided by the General Director/ Head of Production, showing the date and time on the premises.

They will read any safety notices or instructions given to them by the General Director/Head of Production or other employees and obey any instructions.

They shall observe and obey all Company rules and instructions at all times. Failure to do so will mean that they will be asked to leave the location.

They shall not perform any work on the premises until they have agreed, by signing, that they will comply with all ETO Health and Safety rules and instructions.

They shall report to an employee any hazards or risks which they encounter or cause - ensuring that they leave the location safe when they leave.

4.0 Arrangements for the Implementation of Health and Safety Policy

In order to meet its statutory obligations and to implement the aims of this policy the following procedures will be adopted to ensure compliance.

Where more detail is required specific arrangements for Health and Safety issues are detailed in specific Risk Assessments, Method Statements and where appropriate supplementary individual Policies.

The Company recognises its duties and obligations imposed by the Management of Health & Safety at Work Regulations 1999.

This section of the Policy describes arrangements and procedures in place to enable the organisation to fulfil the aims and objectives of the Company's Health & Safety Policy.

Effective leadership is a key driver in promoting health and safety in the workplace and ensuring that the Company protects its employees, members of the public and anyone else who may be affected by its activities.

The following principles are intended to underpin its actions and so lead to good health and safety performance. The approach is based upon the core elements of the Plan, Do, Check, Act system as detailed in the HSE document HSG 65 (2013).

PLAN: The Directors will set the direction for effective health and safety management by establishing a policy that is an integral part of the organisation's culture, its values and performance standards. All Directors will take the lead in ensuring the communication of health and safety duties and benefits throughout the organisation.

DO: This policy is intended to ensure, so far as is reasonably practicable, the health and safety of employees, customers and members of the public. The management systems and practices will ensure that risks are dealt with sensibly, responsibly and proportionately.

Organisation: The Company has involved and will continue to involve employees and their representatives in the preparation of its risk assessments, decisions about appropriate preventative and protective measures and written procedures. We have established what we believe to be an effective means of communication and consultation through the Health & Safety Committee and development of overlapping individual responsibilities described in Section 2 of this Policy.

Control: The Company believes, through their Management Structure, that they have clarified Health & Safety responsibilities to ensure the activities of everyone are well coordinated. Measures are in place to ensure duty holders have the time and resources to discharge their responsibilities, set standards and ensure adequate and appropriate supervision.

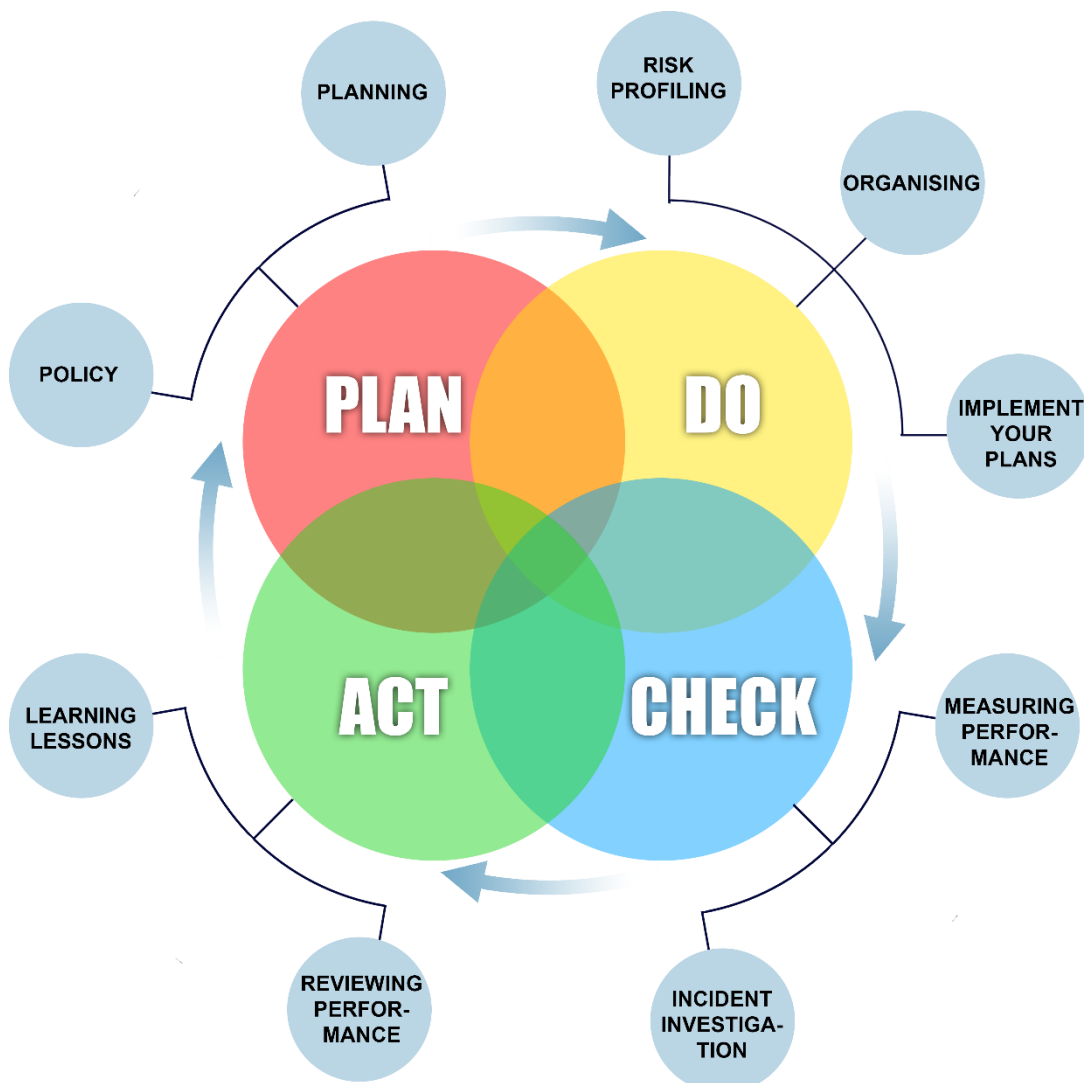
CHECK: Monitoring and reporting are vital parts of a health and safety culture, and management systems must ensure that Directors receive both specific (accident reporting) and routine reports on the performance of the health and safety policy.

Monitoring: Active monitoring will be carried out in accordance with the principles set out in the ACOP to the Management Regulations (Regulation 5).

ACT: A formal review of health and safety performance will allow the organisation to establish whether the strong and active leadership, worker involvement, and assessment and review have been embedded in the organisation and if the system is effective in managing risk and protecting people.

The Company will review the whole of the Health & Safety Management system, to ensure it remains effective, on an annual basis.

Where appropriate, reference is made to official guidance literature such as HSE Guidance Notes and Booklets, Approved Codes of Practice, trade association literature and the Company's codes of safe practice/safe systems of work and risk assessments.



4.1 Accident / Incident Reporting

It is the expectation that all ETO employees, will:

- Immediately report all accidents, hazards, near misses and damage to safety equipment to their Line Manager and formally record them on the incident report form available.
- If the individual involved is unavailable as a result of the incident (e.g. in hospital), the Line Manager should record the event on their behalf.
- If the staff member involved in the incident refrains from work for seven days or more (which may include weekends or rest days), the individual **must** contact their Manager ASAP to inform them of the details including any treatment received and possible date of return.
- Should the injured person be a member of the public or customer, a member of staff should complete the form and forward to their line Manager who should in turn contact where appropriate the General Director / Head of Production.
- All incidents will be investigated by the HODs/Manager using the appropriate form.
- Any remedial actions which may arise from the incident must be reported, recorded and passed to where appropriate, i.e. the General Director / Head of Production.

Reporting the incident to the HSE under RIDDOR

- The line Manager will **immediately** inform where appropriate the Production Manager or General Manager incidents falling within the RIDDOR Regulations as there are legally imposed time scales for reporting an incident to the HSE. **See appendix B INDG453 (Rev October 2013).**
- Following a RIDDOR reportable incident the General Director / Head of Production and the line Manager will undertake the investigation.
- A copy of the RIDDOR report will be kept on file by the Health and Safety Manager.

Investigation

The purpose of an investigation is to learn from the experience and prevent re-occurrence.

- If the investigation identifies a criminal act or an act of negligence, then the matter will be referred to the General/Production.
- Before you begin to investigate read the original report form and gather all available documentation e.g. Risk Assessments rotas.
- The interview must be carried out in a private place and as non-confrontational as possible.
- Ensure the interviewee fully understands the purpose of the interview including arrangements for recording and signing by interviewer / interviewee as a true record of the meeting.

The basis of the investigation should be to establish the actual facts of the event leading to establishing the immediate, underlying and root causes.

First stage: Establishing the facts

- The chronology of the event.
- Where did the incident take place – specify the exact location / room / area.
- What time of day / weather conditions (if relevant)?
- The role(s) of any witnesses in relation to the event.
- How the event happened.
- Is CCTV footage available?

Second Stage: What can we learn about the event?

- Why did it happen – was there any contributory factors i.e. lack of staff / equipment / time?
- Were photos taken after the event?
- Identifying any immediate and underlying causes.
- How can we prevent a reoccurrence?

Third stage

- Record your findings and ensure you communicate with the General Director/Head of Production.
- The witnesses (individually or team based) may need support either emotionally or with physical assistance to return to work, advice can be sought from the General Director/Head of Production.

The General Director/Head of Production has the responsibility for incident trend analysis. All original forms together with any investigation documentation will be held for seven years and will then be destroyed.

4.2 Asbestos

There are currently no asbestos-containing materials at either site operated and managed by ETO, so no controls are necessary at the time of writing.

The Head of Production will request information regarding touring venue asbestos to ensure that staff are aware of any possible onstage risks, such as proscenium arch or safety curtains. This information must be documented and passed to the touring Company Stage Manager for future records while the production is situated in the venue.

4.3 Audits & Audit Review

In general terms, a safety audit subjects the company's activities to a systematic examination with the objective of identifying the strengths and weaknesses in the management system. In line with HSE guidance, ETO will use a Plan Do Check Act approach for their Health and Safety Management system examination (the list is not exhaustive).

- The Policy
- The Arrangements.
- Training Records.
- Systems and Procedures.

Audits are typically carried out by safety professionals or other appropriately qualified personnel.

The Management Team will initiate the Health and Safety Audit either at scheduled intervals (Annually) or at the suggestion of the Health and Safety Committee.

Conducting the Audit

Prior to the Audit the Auditor must make contact with the Manager of the area to be audited arranging a suitable time for the audit and giving clear guidance on the scope of the Audit e.g.

- Documentation to be examined.
- Physical tour of the workplace.
- Appointments for interviewees.
- Opening and closing meetings.
- All Audits should **commence** with a meeting between the audit team and any relevant Managers of the areas being audited.
- The **closing** meeting will enable the Auditor to give an overview of the findings, recommendations for improvement together with achievable time scales.
- Communication and cooperation expectations.

Final Audit Report

The signed and dated report must identify the remedial actions as being either;

- **High Priority** – Legal non-compliance or High Safety Risk;
- **Medium Priority** – Safety System Management non-compliance;
- **Low Priority** – an observation - a condition that would improve safety standards.

Report should include:

- Summary.
- Introduction.
- Audit Results, conclusions and recommendations.
- Summary of recommendations along with timescales for completion.

4.4 Construction (Design and Management) Regulations 2015 (CDM-2015)

The Construction (Design and Management) Regulations 2015 (CDM 2015) apply to all construction projects, including those undertaken in the entertainment industry.

The ABTT have stated that “any actions required should always be proportionate to the risks in the project” (ABTT draft guidance on CDM, V2 updated).

The definition of construction includes “the assembly on site of prefabricated elements to form a structure or the disassembly on site of the prefabricated elements which, immediately before disassembly, formed a structure”.

A health and safety file is only required for projects involving more than one contractor; however, the ABTT suggest that a safety file of proportionate size is maintained for all productions.

CDM defines a number of roles (functions) within a construction project.

- Client
- Principal Designer
- Designer(s)
- Principal Contractor
- Contractor(s)

Client (usually the producer or whoever commissions the work):

- Role is to make suitable arrangements for managing the project and allocating suitable time and resources. For most productions the producer will retain both of these roles.
- Where there is more than one contractor working on site appoint in writing the principal contractor and principal designer.
- Must ensure that before the construction work begins a “construction phase plan” is drawn up by the principal contractor.
- Ensure that the principal designer prepares a “health and safety file” for the project.
- Where the project is notifiable the client must notify the HSE.

Principal Designer

- Plan, monitor and manage the pre-construction phase of the project.
- Produce the health and safety file.

Principal Contractor

- Plan, monitor and coordinate the construction phase of the project.
- Coordinate the works and workers.
- Ensure the site inductions are undertaken.
- Take steps to prevent unauthorised access to site.

Contractor:

Receiving houses will in most cases be acting as contractors providing services into the principal contractor (aka the producer).

Contractors' duties include:

- Must not carry out work unless satisfied that the client is aware of the duties owed by the client under CDM.
- To comply with the directions of the principal designer and principal contractor.
- To work in accordance with the construction phase plan.
- To only appoint persons to work who are competent.
- To ensure each worker has suitable information, instruction and supervision. This will include a site induction, safety procedures, PPE, information on risks, risk assessments etc.
- To not begin work unless reasonable steps have been taken to prevent unauthorised access to site.

When the Company has a duty under the CDM Regulations, steps will be taken to ensure that those duties are fulfilled in accordance with the guidance.

It is most likely that ETO would be undertaking the role of Client and as a client ETO has an influential role in how the work is done.

Summary of Client's role:

To make suitable arrangements for managing a project. This includes making sure that:

- Other duty holders are appointed.
- Sufficient time and resources are allocated.
- Relevant information is prepared and provided to other duty holders.
- The principal designer and principal contractor carry out their duties.
- Welfare facilities are provided.
- The site is secure and segregated.
- All site operatives undergo an induction.

Before any construction work commences a construction phase plan (CPP) will be drawn up. The plan will set out the health and safety management arrangements for any construction work, the construction site rules and any specific measures concerning work involving the

particular risks in Schedule 3 of CDM 2015 e.g.: work involving the assembling of heavy prefabricated products.

The project will be notified to the HSE if the construction work lasts more than 30 working days and has more than 20 workers simultaneously working on it, or it exceeds 500 person days, using the HSE F10 notification form.

Pre-construction information will be provided by the client assisted by the Principal Designer.

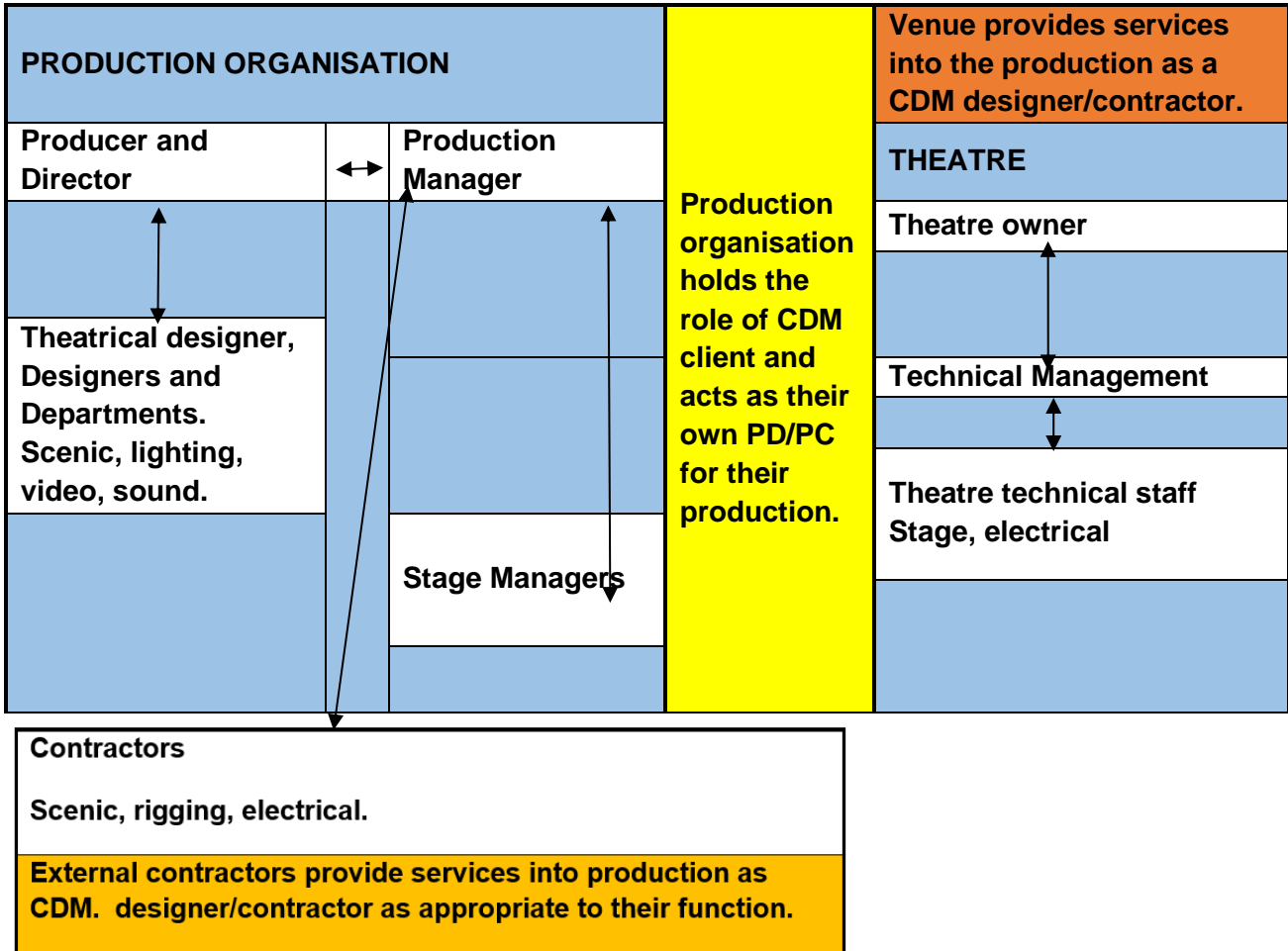
A health and safety file will be prepared where a project involves more than one contractor. This will detail such information such as how a structure is to be dismantled in a particular sequence to ensure it remains stable during the dismantling.

A safety file will be held for each production which will hold:

- Risk Assessments and/or Show Riders.
- Production Risk Assessment.
- Production Method statements.
- Production scheduling, Construction Phase Plan.
- Technical detail on rigging and loadings.
- Electrical inspection under BS 7909.
- Proof of fire rating for set structure, fabric cloths, and props.
- Production inductions – site attendance registers.
- Safety Instructions and Evacuation procedure signed toolbox talks.

A proportionate approach to routine, standard set and temporary structure builds may simply be to say that there are no unusual or significant features in terms of its design or construction methods.

CDM role allocation for a typical touring production taking place at a receiving house:



4.5 Contractor Management

The Company recognises the importance of controlling activities of contractors who may from time to time be required to undertake specialist work on their behalf.

In general terms, Managers responsible for engaging contractors are expected to:

- Take steps to ensure that the Company's employees are not exposed to any risks created by the contractor's work; and
- Ensure that contractors are not exposed to any risks from the Company's activities.

All Contractors will be required to be formally approved to ensure they demonstrate good health and safety performance.

Contractor Monitoring

The degree of control exercised over contractors will inevitably vary considerably and will largely depend on the nature and location of the work. However, where practicable, the following points should be in place:

- Identify the work being undertaken
- Appoint appropriate contractor
- Identified ETO contact point
- Undertake Local induction as outlined in the Contractors handbook
- Issue Contractors Handbook
- Risk assessments/method statement
- Where appropriate, CoSHH assessments for the work.

Other visitors

All persons who receive authorisation to go on stage during a fit-up must undertake local induction from an ETO contact. The individual will be expected to wear a safety helmet/high visibility jacket and safety footwear. Refusal to do so may result in removal and prohibition from the stage area.

Public Safety

At all times, members of the public will be safeguarded, and the Company will take reasonably practicable steps to ensure their health and safety during the conduct of its undertakings.

Temporary workers on fixed-duration indirect contracts

ETO will treat the individual as they would a permanent member of staff ensuring as far as reasonably practicable their health, safety and welfare whilst undertaking their employment.

4.6 Control of Substances Hazardous to Health (COSHH)

The purpose of the CoSHH Regulations is to ensure the employer continues to review the hazardous substances used within the workplace and wherever possible, eliminate, reduce or substitute harmful substance for those less harmful.

The key areas which are covered in COSHH are:

- Legionella
- Dust and fumes
- Chemicals substances.

Having established the type of substance used, the employer must assess possible health risks to their employees and others who may be affected, from hazardous substances used for work.

Examples of the effects of hazardous substances include:

- skin irritation, dermatitis or burns because of skin contact
- asthma because of developing an allergy to substances used at work
- losing consciousness because of being overcome by toxic fumes
- cancer, which may appear long after exposure to the chemical that caused it
- infection from bacteria and other microorganisms (biological agents).

Examples of when you may come across hazardous substances include:

- substances used directly in work activities (adhesives, paints, cleaning agents)
- substances generated during work activities (fumes from soldering / welding, sanding, and grinding)
- naturally occurring substances (wood dust)
- biological agents such as bacteria and other micro-organisms (contaminated water if using water effects in a show like rain curtains).

The cornerstone of the Regulations is the preparation of a suitable and sufficient assessment, which should enable valid decisions to be made as to appropriate control measures.

There are many different control measures available, and these are commonly presented as a hierarchy of control in the order in which they should be selected:

- Elimination
- Substitution
- Enclosure
- Isolation
- Local ventilation
- General ventilation
- Limit exposure
- Good housekeeping
- Good welfare and personal hygiene
- Information, instruction and training
- Personal protective equipment.

When implementing controls, elimination or substitution for a less hazardous material should be the first thought. However, if this is not possible, other control measures e.g. personal protective equipment (PPE) should be sought providing it offers adequate protection.

Dust and Fumes

Exposure by breathing in gases, fumes, mist, or dust:

Some substances can attack the nose, throat, or lungs while others get into the body through the lungs and harm other parts of the body such as the liver.

Exposure to the eyes:

Some vapours, gases and dusts are irritating to eyes.

Heads of Department will ensure that all processes under their control have been adequately assessed and will ensure that any control measures are properly implemented, maintained and periodically examined. A COSHH assessment must be completed and available at each workplace. **Example template – see appendix C.**

Results of COSHH assessments and appropriate Safety Data Sheets must be brought to the attention of relevant employees so that they understand the health risks and the measures required to prevent or adequately control the risks.

4.7 Cooperation and Coordination

ETO share some workplaces with employees from separate outside undertakings, mainly production company employees such as performing artists, musicians, and technicians. There are relatively straightforward established practices for cooperation, coordination and provision of information once the 'show' has opened, however, Health & Safety arrangements become much more complex during the pre-performance period of a new production.

ETO has developed appropriate practices to satisfy the requirements of Regulations 11 & 12 of the Management of Health and Safety at Work Regulations e.g. local induction and site meetings.

4.8 Display Screen Equipment

Scope of the regulations

Where ETO activities require the use of DSE equipment the regulations apply in their entirety.

Display Screen Equipment Regulations seek to protect the health of workers by reducing risks from VDU work. Briefly, the Regulations require employers to:

- **Risk assess the workstations and the individual**

An assessment should be done when a new workstation is set up, when a new user starts work, or when a substantial change is made to an existing workstation (or the way it is used). Assessments should also be repeated if there is any other reason to suspect they may no longer be valid - for example, if users start complaining of pain or discomfort. ETO require all employees to undertake a self-assessment in the first instance. This is then reviewed by a DSE assessor who may seek ergonomic or occupational health advice from an external professional.

- **Ensure workstations meet specified minimum requirements**
Minimum Workstation Requirements are set out in Annex A of L26 HSE guidance.
- **Plan work activities so that they include breaks or changes of activity**
DSE work should be planned so as to ensure that it is periodically interrupted by rest breaks or changes of activity to prevent fatigue and to vary visual and mental demands.
- **Provide eye and eyesight tests on request, and special spectacles if needed.**
An application form can be obtained from your Line Manager. The tests are conducted by a registered ophthalmic optician who is nominated by the Company. Tests are offered when a person first becomes a user and thereafter at intervals of one year for those over the age of forty and two years for those under the age of forty.

If the tests indicate that special corrective appliances are required by the user, ETO will meet the cost of a basic spectacles and lens or contact lenses designed specifically to correct vision defects at the normal display screen viewing distance.

For productions the focus will be on work areas, such as DSM positions, lighting and sound control, the Wigs and Wardrobe environments.

For DSM, Lighting and Sound the aspect is seating, space, and general environment such as temperature and noise. For Wigs and Wardrobe, it is about seating, tables, and lighting if their tasks require intricate needlework or standing for periods of time to dress a wig.

For example, a Deputy Stage Manager could encounter many DSE-associated hazards during their working day:

- the seat
- the design of the desk
- low lighting levels
- space in the working environment
- Their environment can be busy, noisy and, at times, hot.

In the technical area, the Lighting and Sound staff spend a lot of time looking at monitors or computer screens while either seated or standing at their relevant consoles to operate the shows or program them.

General Hazards:

- Lighting may be causing glare on the screen.
- Seating is not suitably set up.
- keyboards, mouse, and screen that are not set up in the correct space or distance due to space.
- Posture due to length of time working, using phones, bacterial spread due to different persons using equipment.

Occupational Health

Computer workstations or equipment can be associated with neck, shoulder, back or arm pains, fatigue and eyestrain. Mostly these conditions do not indicate any serious ill health, but it makes sense to avoid them as far as possible.

These aches and pains are sometimes called upper limb disorders (ULDs) or repetitive strain injuries (RSI). These problems can be avoided by following good practice.

Symptoms include tenderness, aches and pain, cramp, stiffness, weakness, tingling, numbness or swelling. If you have any symptoms, it's important to get treatment quickly. The sooner treatment is started, the better the chances of recovery.

Training

All ETO staff undergo induction training which when appropriate will include “working with DSE equipment “.

4.9 Electrical Safety

ETO recognise that employees who carry out work with, on, or near electrical equipment need to be aware of the dangers. Harm can be caused to anyone when they are exposed to 'live parts' that are either touched directly or indirectly by means of some conducting object or material.

The Electricity at Work Regulations applies to all aspects of the use of electricity within the workplace from supply to the use of electrical equipment; employers have a duty to prevent danger in the construction, maintenance and use of electrical systems fixed and portable.

Good practice when dealing with electricity

Always consider the potential hazards regarding electricity e.g. by ensuring:

- Electricians are trained, have appropriate equipment and taken adequate precautions e.g. power has been disconnected.
- Electrical equipment is not misused.
- Control measures are implemented to prevent electrical short circuit, overload, or coming into contact with overhead power lines.
- Fire prevention measures are implemented where electricity could be the source of ignition.
- When using electricity in wet surroundings, out of doors or in cramped or confined space, sensible precautions are in place e.g.
 - **Reduce the voltage**
 - **Provide a safety device** (Residual Current Device (RCD))

Preventative maintenance

All electrical equipment, installations and portable electrical apparatus, (plant tools, extension leads etc. bearing a unique identification number) should be inspected, tested

and maintained by a qualified electrician at suitable intervals to ensure safety and integrity of the installation.

Record keeping

Each operating location will keep a register of all examinations, tests and any necessary repairs carried out on both the installation and portable apparatus. Heads of Departments will ensure that the register is properly maintained and available for inspection by an enforcement officer.

Live working

Regulations 14 and 15 of the Electricity at Work Regulations lay down strict requirements with regard to work near live conductors which could result in danger. Prior to permitting live working, the following three conditions must all be satisfied:

- It is unreasonable in all the circumstances for the exposed live conductors to be dead; and
- It is reasonable in all circumstances for the operative to be at work on or near the conductors while they are live; and
- Suitable precautions (including, where necessary, the provision of suitable protective equipment) are taken to prevent injury.

Temporary Electrical Installation BS 7909-

BS 7909 requires productions to design their systems in accordance with the Wiring Regulations, i.e., to ensure systems work effectively and protect against the risks of shock and fire. A focus is on management of the production and its requirements of the Management of Health and Safety at Work Regulations 1999. It requires the Production Manager to appoint someone electrically competent to oversee the electrical system. This will be a Head of Lighting, or Senior Production Lighting Person. Under BS 7909, this person is called the 'Senior Person Responsible' (SPR).

The testing needs to be completed before the system is handed over to the rest of an event crew for general use and the test results noted. The certification would normally be completed when everything is operational and the SPR has satisfied himself that the system is safe and works effectively. Temporary systems need re-testing and re-certification (or amended certificates) when substantial changes in the distribution occur.

Each event is different, but examples may be:

- New locations – each time a system is put together in a new location or venue.
- Significant additions of equipment, e.g. a new multiple-channel dimmer and lighting circuits or a dining bus rather than a couple of individual light fittings or an extension lead to power a kettle. Changes of supply, e.g. switching from using a building or venue supply.
- Damage or interference to the equipment, including unforeseen environmental effects (flood, fire, etc.).

PAT Testing

All portable electrical apparatus, plant tools, extension leads etc. will be labelled with a unique identification number and periodically examined and tested by a competent person using Portable Appliance Testing in line with the HSE guidance INDG 236 (Rev 3) 2013 and HSG107 (3RD Edition) and Appendix F for frequency and type of test.

The main considerations will be:

1. Selection and procurement – suitable and sufficient for the task, tested and logged onto the local inventory system.
2. Hired and leased equipment – ensure that records are available for equipment brought in or hired to the Production.
3. Equipment out of service date – clear local procedure and understanding of the action to be taken.
4. User checks – the user is responsible for visually checking equipment before use, and for reporting any visual defects or operational faults found.

4.10 Emergency Procedures

Where a risk assessment or emergency plan requires the implementation of emergency procedures as a control measure, these measures must be practised at least annually to ensure they are fit for purpose.

The situations where emergency procedures may be required include (but not exhaustive):

- Fire safety e.g. evacuation.
- Confined spaces.
- Working at height.
- Working with hazardous substances.

Adequate information, instruction and training will be provided to ensure that relevant personnel understand any emergency procedures relating to their activities. It is not acceptable to simply rely on the emergency services.

4.11 Engineering examination procedures

There are statutory requirements to undertake periodic tests and thorough examinations for example:

- Lifting equipment, (LOLER).
- Electric supply, plant and wiring (PIR).
- Local exhaust ventilation appliances (woodworking machines).
- Harness, anchor points and fall arrest system.

Tests and thorough examinations should be carried out by a qualified person and records must be maintained.

Heads of Departments are expected to co-operate with the Production Manager to ensure that these arrangements are fully, and effectively implemented and adequate facilities exist for keeping the necessary records of examinations and tests.

4.12 Fire

Fire Risk Assessment and Emergency Plan

In order to comply with the Regulatory Reform (Fire Safety) Order 2005 all ETO venues will be subject to an annual robust Fire risk assessment (FRA) to establish a clear picture with regards to any specific building or people related hazardous. The risk assessment will identify the use of the building and ensure suitable control measures are in place including prevention, detection and training issues.

The fire safety risk assessment for theatres, cinemas and similar premises will also be used for guidance on managing fire safety within the theatre environment.

It is the Venue Managers' responsibility to ensure the findings of the fire risk assessments be reviewed and implemented where reasonably practicable in order of priority.

General fire precautions, including storage of flammable liquids and combustible materials will conform to the standards set out in this Policy so as to reduce the risk from fire.

The Emergency Plan will contain the precise details on:

- Action to be taken in the event of the operation of the fire alarm system.
- The provision of suitably trained fire warden and their role in the event of a fire evacuation.
- Ensuring means of escape for persons with special needs.
- Assembly point (roll call).
- Information to be communicated to the fire brigade.
- Re-entry to the building.
- Undertaking six monthly evacuation drills.

Apart from routine Fire Brigade inspection performances can also be subjected to "During Performance" inspections, these inspections can happen at any time during a performance. Every assistance must be given to the Fire Brigade.

4.13. Firearms and Weapons Procedures

Legal requirements concerning the health, safety, and welfare of those involved in the use of firearms and weapons in film, TV, and theatre exist. These are the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999 as amended (the Management Regulations).

Definitions:

For this guidance, the following terms are used:

- Firearms (s) include live, air, blank-firing, imitation, replica, and deactivated firearms.

- The weapon includes any object which is designed to inflict bodily harm, such as crossbows, catapults, any sharp-edged instruments used in a fight sequence (swords and knives) or martial arts weapons (such as rice flails) and batons, battering rams, swords, spears, longbows. This guidance also covers articles such as replica weapons and props, which are not designed specifically for the purpose of inflicting bodily harm, but which may pose such a risk when used as a weapon.
- A weapons expert or competent person has the necessary knowledge, experience, and training to advise on using the weapon. These may include armourers, sword masters, fight arrangers or martial arts experts.

Responsibilities:

It is the producer who has overall control of the production and who must make sure that there are arrangements to:

- Coordinate safety.
- Direct action sequences safely.
- Exchange information with others, including the person in control of the weapon and other contractors, premises managers, freelancers and the self-employed.

The producer should make sure that the person directing the action:

- Is competent.
- Has assessed the risks of the sequence to be filmed and agreed on any needed controls with the stunt coordinator, the weapons expert, the actors, and the crew (as appropriate).
- Knows which filming methods to reduce the risk to people involved (using the correct lens, angles and camera height).
- Has scheduled time for rehearsals, safety briefings and reassessment of the hazards and risks if any changes are proposed.

The producer should make sure that the person in control of any weapon:

- Is competent and holds the necessary licences.
- Is provided with adequate information about the sequence to be recorded.
- Has provided a written assessment of the risks and identified the controls needed.
- Has agreed to specify and/or supply the protective measures identified in the assessment.

The producer should also make sure that:

- The controls identified in the assessment are implemented and communicated to those affected.
- There is cooperation and communication with the owners of the premises or location being used.
- There are adequate arrangements for emergencies.

Competence:

The person in control of weapons in the production must be competent. The level of expertise required will depend on the weapon to be used and the circumstances. Advice may be sought from:

- an armourer
- a sword master
- a fight director
- the stunt coordinator (see the Joint Industry Stunt Committee (JISC) registers for details on the required qualifications/experience)
- props wrangler or stage manager.

4.14 First Aid Arrangements

The Company will ensure that First Aid facilities are provided at all theatres / venues in accordance with practical guidance set out in the Approved Code of Practice.

The number and location of first aid boxes provided at each of ETO's premises will be determined by the General Director / Head of Production following a first aid risk assessment. First Aid boxes should contain a sufficient quantity of suitable first aid materials. They should not contain medication of any kind. Equipment will be checked on a weekly basis by the relevant first aider.

In the ETO administrative office, there are a minimum of 2 members of staff with First Aid training (First Aid Officers). This should be made known to the whole company.

The team First Aiders are responsible for monitoring the use of the office first aid box and replenishing it as necessary. The first aid boxes are located in the walk-in cupboard in the kitchen area.

The first aid needs of the touring team will be assessed by a first aid needs analysis.

4.15 Highly Flammable Liquids (HFL) and Liquefied Petroleum Gases (LPG)

All liquids displaying a "Highly Flammable" symbol or having a flashpoint below 32 °C must be kept in suitable sealed containers. When not in use, they should be stored in a metal cupboard or bin of fire-resisting construction, labelled "Highly Flammable". An aggregate quantity of up to 50 litres may be stored in the theatre in this manner with Local Licensing Authority approval. Larger volumes must be stored in a dedicated storeroom which is either in a safe place, i.e. away from the building or in a fire-resisting structure.

Combustible materials must not be stored with HFLs or LPG.

Quantities of HFLs and LPG in use in the theatre should be kept as low as possible and containers must be promptly replaced in the appropriate store.

When not in use, LPG cylinders must be stored upright at ground level in a well-ventilated place in the open air away from pits, basements, etc. where leaking gas could accumulate. Up to 300kg of LPG may be stored in a lockable wire cage situated in a well-ventilated place in the open air, following the guidance for distance from external walls (2m), internal walls and other objects.

Cylinders must never be stored in locations where a leak may give rise to an accumulation of gas and risk of fire or explosion. Acetylene cylinders may be stored with LPG, but oxygen cylinders must always be stored separately. In all circumstances, gas cylinders must be secured in an upright position.

Theatre management and all supervisory staff will ensure that smoking is prohibited in all areas where HFLs or LPG is being used or stored.

Information on the location and quantities held must be given to Stage Door or reception to be passed to the Fire Brigade in the event of an emergency.

4.16 Hot Working (welding)

The term “hot working” can cover a variety of activities including:

- Soldering small repairs e.g. electrical repairs
- Frame cutting e.g. sets or props
- Repairs to plant and equipment.

Welding is defined as a process where two or more pieces of metal or thermoplastics are fastened together by use of heat and pressure, the power used to produce a heat source could be generated by either gas or electric. ETO prefers the use of Electric welding equipment. (See guidance note HSG139).

Hot working permits

ETO has a robust risk assessment process whereby all hot working activities must be reflected, providing the departmental risk assessments reflect safe working practices when undertaking minimal repairs e.g. use of heat mats, PPE and appropriate equipment. It can be deemed acceptable to carry out minimal repairs e.g. repairing headsets, without issuing a “hot working permit”. However, it is expected that when undertaking other significant welding activities, a “hot working permit” will be issued.

These permits will be issued by the ETO representative:

- On the day of the work.
- To an approved contractor who has provided a method statement including the following information:
 - Type of equipment to be used
 - Employees undertaking the work
 - Provisions for COSHH e.g. local exhaust ventilation
 - PPE
 - Training and contact details.
- Ensuring the job is completed on time with the area being left in a safe manner.

The hot working permits will be kept by ETO for three months following the work.

4.17. Inspections / Proactive

Many of the activities undertaken by ETO require a variety of inspections, servicing and maintenance in line with both legal and manufacturer's guidance.

In order to meet these standards, ETO have made a commitment with regards to resources to ensure that inspections, servicing and maintenance are carried out in a timely manner.

Testing inspection and maintenance schedule will be devised by the relevant HOD, with appropriate records kept.

Workplace inspections:

It is the duty of the responsible person in each premise to carry out a six-monthly workplace inspection. Persons responsible for these inspections are:

- General Director
- Head of Production (Offsite Storage Facilities)
- Company/Stage Managers are responsible to ensure their production areas are also inspected.

4.18 Legionnaires Disease

The General Director / Head of Production will ensure systems and procedures are in place for the control of Legionnaires and water safety within the office to ensure compliance with the HSE L8 guidance.

In order to comply with the guidance, the Head of Building Maintenance will ensure that the following actions are taken: -

- a) Identify and assess sources of risk (by a competent person).
- b) Prepare a scheme (or course of action) for preventing the risk.
- c) Implement and manage the precautions/scheme – appointing a 'responsible person' to be managerially responsible.
- d) Keep records and check that what has been done is effective.
- e) Where appropriate, notify the local authority of any cooling towers on sites.

Foreseeable Risk of Exposure Exists in: -

- a) Water systems incorporating a cooling tower.
- b) Water systems incorporating an evaporative condenser.
- c) Hot and cold-water systems.
- d) Other plant and systems containing water which is likely to have a water temperature between 20°C and 45°C which may release a spray or aerosol during operation or when being maintained.

Risk Assessments have been prepared for all the work locations and will be issued together with the individual logbooks to each property.

A responsible person will be the nominated for the offices and the warehouse.

4.19 Lone working

It will be extraordinary for ETO staff to be working alone during core hours; however, when employees work late or at the weekend or go off site e.g. Storage Facilities or for banking, it is essential that an arrangement is put in place whereby they can be monitored and in the event of a concern e.g. late return, an alarm can be raised.

This arrangement should be reflected in the relevant risk assessments with the identified control measures e.g. access to mobile phones or buddy system.

Should an emergency situation arise Senior Management must be informed immediately, and action taken.

Following such an incident an investigation must be undertaken to prevent re-occurrence.

4.20 Manual Handling

Proper consideration must be given to manual handling tasks and any hazards arising that may present a risk of injury. Before allowing any person to carry out a manual handling task, Managers are to assess and impose suitable controls on the:

- Task
- Individual
- Load
- Environment.

Employees undertaking significant manual handling operations must receive appropriate levels of information, instruction and/or training, before they commence the activity.

Whenever possible loads should be designed ensuring:

- Sufficient trained staff to undertake the task.
- Reduction of unnecessary bending, twisting, stretching, carrying for long distances.
- Mechanisation is considered for frequent or repetitive manual handling loads.
- The working environment is as far as reasonably practical safe e.g. clear gangways, removing obstructions, keeping floors clean, providing proper lighting and temperature control.
- Where practical loads are marked with their weight and with hand holds e.g. when commissioning props or scenery instructing the supplier to supply such information.

No member of staff should attempt to carry out any manual handling operations beyond their own individual capabilities.

4.21 Monitoring the Policy

ETO are committed to continuous improvement and monitoring of the implementation of the Policy; information which could result in making changes gained through reporting on the following procedures:

- Accident reporting procedures.
- Independent safety reports and audits.
- Minutes of committee meetings.
- External resources e.g. HSE, professional bodies.

The Policy will be reviewed and updated annually.

4.22 Machinery and Plant

All equipment purchased from a reputable supplier is suitable for the tasks to be undertaken.

Staff requiring additional tools must request tools from their line Manager and not bring in equipment from home.

All work equipment will have a risk assessment that shows the controls for its use, and many will have safe working procedures for them. Below are the hazards and controls that would be considered for these risk assessments.

- **Suitable** - for use and the purpose and conditions in which it is used.
- **Maintained** - in a safe condition for use so that people's health and safety are not at risk and
- **Inspected** - to ensure it is and continues to be safe for use.

Selection of Equipment

When selecting work equipment either new or existing, ETO will ensure that it is suitable for the task. For simple tasks using 'toolbox tools' such as hammers, employees will be expected to use common sense in selecting the appropriate tool. For more complex tasks and use of either powered or fixed equipment, such as workshop machinery, supervisors should undertake a risk assessment of the task, including the selection of work equipment to be used.

All ETO Employees, when provided with equipment, are required to:

- Check that it is the equipment as identified in the risk assessment or task-specific method statement.
- Check that any equipment with a specified life is in-date.
- Comply with the manufacturer's instructions and follow any training given. Before use, raise any concerns with the Supervisor.
- Report any deficiencies or losses to their supervisor.

ETO will ensure that risks created using the equipment are eliminated where possible or controlled by:

- Provision and maintenance of suitable guards and other protection devices; markings and warning devices; system control devices (such as emergency stop buttons) and, as a last resort, personal protective equipment; and by
- Following safe systems of work and providing adequate information, instruction, and training.

Hand Tools

Once issued, small tools will be used, inspected, maintained and stored in line with manufactures' guidance; for older equipment where the manuals may have been lost apply common sense ensuring equipment remains in good working order.

Tools should be visually inspected prior to use, defective equipment should not be used and taken out of service.

Hand-held Power Tools

All mechanically or electrically driven portable tools issued by the Company, or hired for use by ETO employees, should be examined before use and any defects reported to the appropriate HOD. Electrically driven portable tools must be properly installed, insulated, connected, earthed and maintained.

Where practicable, 110-volt equipment, in combination with a transformer with a centre tapping to earth, is to be preferred to 240-volt portable equipment.

Plant or equipment on hire will be obtained from approved suppliers who certify their equipment and keep it maintained.

Where the hire period extends beyond planned preventative maintenance schedules, provision must be made to ensure arrangements are made to carry out maintenance by either contacting the Hirer or including on ETO planned maintenance program.

If there are any defects which affect the safety of the equipment, then it should not be used and the defect drawn to the attention of the HOD who will arrange for the supplier to carry out repairs or supply a replacement.

Woodworking machines

The Company recognises the specific risks associated with the operation and use of woodworking machines. Both practical and safety training will be given to all operatives. Only authorised persons are allowed to use woodworking machines. The only exception to this rule is for those persons undergoing training under immediate supervision of a competent person.

Cutters (including saw blades, chain cutters, knives, boring tools detachable and solid cutters) must be enclosed by a guard to the greatest extent practicable, having regard to the work being done. No adjustments should be made to any guard or woodworking machine whilst the cutters are in motion except where adjustment can be made without danger.

Sufficient clear and unobstructed space must be provided around every woodworking machine to enable work to be done without risk of injury.

Maintenance of Equipment - ETO will have a program of planned preventative maintenance (PPM) activities at required intervals to ensure that equipment is maintained in a safe and efficient working order. The program includes inspection, testing, cleaning, repair, and replacement by a competent person. Maintenance of Equipment is recorded on the equipment inventory. Defective Equipment must be reported to the Production Company Manager or Production Manager, who will withdraw it from service and label it to prevent its inadvertent use.

Portable electrical equipment - As part of any PPM arrangements for and record of regular maintenance by a competent electrical contractor (NICEIC Approved Electrician or equivalent) for each item of portable electrical equipment.

Supervisors shall inform employees that they should not attempt to repair or maintain electrical equipment unless trained and certified to do so and that any defective equipment must be reported.

Private electrical equipment should not be used in the workplace unless the supervisor has approved it and the equipment has been checked and passed by a competent electrical contractor.

Maintenance of Personal Protective Equipment – Must be carried out in accordance with the PPE at work (Amended) Regulations 2022, as per 'Instructions for Selection, Use and Storage of PPE.

Abrasive Wheels:

Only operatives trained and certified to change abrasive wheels should do so. At all times, fixed and portable grinding machines should be fitted with a properly maintained guard. In the case of bench-mounted machines, the tool must be correctly adjusted. Operators must wear eye protection which meets the requirements of the Personal Protective Equipment at Work Regulations 1992.

4.23 Noise and Vibration

Noise

The Control of Noise at Work Regulations 2005 require employers to prevent or reduce risks to health and safety from exposure to noise at work. The company recognises its duty to reduce the risk of hearing damage to the lowest level reasonably practicable and comply with the provisions of the regulations and the guidance issued in HSG260 "Sound Advice."

The music and entertainment industries are unique in that high noise levels and extremely loud special effects are often regarded as essential elements of an event. However, loud sounds, whatever the source, can damage hearing. Hearing damage is permanent and incurable. Performers and other workers in music and entertainment are just as likely to have their hearing permanently damaged as workers in other industries.

As a general guide, if a person has to shout or has difficulty being understood by someone about 2 metres away, it is likely that noise levels are in excess of 80dB(A). This is known as the Lower Exposure Action Value.

The risk assessment process should identify areas where excessive exposure to noise is a concern.

Should the noise assessments identify that employees are likely to be exposed to high noise levels, i.e. above the Lower Exposure Action Value, then a hearing protection programme should be initiated, details of which will depend upon the severity of the noise problem. The programme may include the following elements: engineering controls to reduce noise at source; enclosures; delineation of hearing protection zones and provision of hearing protection.

Employees at risk will receive information, instruction and training about risks to hearing and the measures necessary to minimise the risk. Employees will also be offered health surveillance, the results of which will be held by the Musicians' Hearing Service or other appointed occupational health professional in strict confidence and will not be shared with the Company or any other party without the employee's prior consent.

Employees who are exposed to levels at or above the Upper Exposure Action Value of 85dB(A) should be aware that health surveillance and the wearing of hearing protection is mandatory at these levels. The Company expects employees who are required to use hearing protection to make full and proper use of them. Failure to do so may result in our having to commence disciplinary action.

Any defects with hearing protection or the noise enclosure must also promptly be reported to management. All noise control measures, and personal protective equipment will be properly maintained, repaired or replaced as necessary.

Noise which is defined as unwanted sound can emanate from equipment, people and entertainment sources and is measured in decibels often expressed as dB (A).

The regulations require specific action to be taken at certain action levels:

Lower exposure action level

- daily or weekly exposure of 80 dB (A)
- peak sound pressure of 135 dB;

Upper exposure limit

- daily or weekly exposure of 85 dB (A)
- peak sound pressure of 137 dB;

Exposure limit value

- daily or weekly exposure of 87 dB (A)
- peak sound pressure of 140 dB;

The table below gives an example of how long it takes to reach a particular noise dose:

Average noise level	Time taken to receive a dose equivalent to the upper exposure action value (85dB)
85dB	8 hours
95dB	45 minutes
100dB	15 minutes
105dB	5 minutes
110dB	Under 2 minutes
115dB	Under 30 seconds

Procedure:

Production

During pre-production meetings the production team will be responsible for ensuring that elements of the production which include high noise levels are identified and controls discussed.

At each venue an assessment of the exposure to noise will be made using a dose badge.

The production manager will be responsible for ensuring:

- Noise monitoring is in place for each performance.
- Measurements will be taken at points where noise is expected to be at its highest level (based on the pre-production information provided for each show).
Where noise levels exceed the levels identified above then appropriate controls are put in place to protect staff. (i.e. reducing noise levels or identifying hearing protection areas)
Those taking measurements are suitably trained on appropriate use of the noise measurement equipment.

General Procedures (including non-production times)

An evaluation of whether there is a noise problem at work will be conducted by asking the following:

- Is the noise intrusive for most of the working day?
- Do employees have to raise their voices to carry out a normal conversation when about 2 metres apart for at least part of the day?
- Are employees exposed to noisy equipment for more than 30 minutes each day?
- Are employees exposed to impacts such as hammering, or explosive sources such as pyrotechnics?

Where a risk of exposure to noise in the workplace has been identified, this will be the subject of an assessment and evaluation by a Competent Person.

The noise assessment will identify what needs to be done to control the risks:

- Who is at risk and under what circumstances?
- Daily personal exposure taking into account the level of the sound and how long it lasts.
- Prepare an action plan setting out what needs to be done to control the risks.
- Who is responsible for the actions and a timetable for implementation?

Collective protective measures should always be used in preference to individual protective measures. The approach for the control of noise will be, in order of preference, to:

- Eliminate the hazard or risk altogether (if it is reasonably practicable to do this, it should be done);
- Control the risk at source (for example reduce the volume, substitute quieter sources);

- Reduce the noise as it travels to the people exposed (for example physical barriers, distance, absorptive materials):
- Reduce exposure.

If these measures are not adequate to reduce the exposure enough, then hearing protection must be provided (see ‘personal hearing protection’).

Personal Hearing Protection

Hearing protection will be provided if the noise level cannot be reduced sufficiently by other methods. Hearing protection is provided with a single number rating (SNR) value. The table below will be used as a guide to which SNR rating will be appropriate:

Noise level in dB	Select a protector with an SNR of:
85-90	20 or less
90-95	20-30
95-100	25-35
100 - 105	30 or more
A hearing protection spreadsheet is available on the HSE website with further details www.hse.gov.uk/noise	

Users of hearing protection will be provided with suitable training on how to correctly fit and use hearing protection using the guidance table below:

Areas covered on hearing protection training.	Tick
Why hearing protectors are provided and where they must be used.	
The need to follow manufacturer’s instructions.	
How to avoid items such as spectacles, long hair, earrings, costume accessories and any other personal protection, interfering with the effectiveness of the hearing protection.	
The need for full acclimatisation.	
Importance of wearing hearing protection at all times in a noisy environment.	
Cleanliness and hygiene (Inc. not sharing earplugs).	
Storage and care (Inc. regular checks to ensure they remain in good condition).	
Where to report damage and how to obtain replacements.	

Health Surveillance

Where a production is identified with the potential for sound to be above the upper action level, the Company will make arrangements as a duty of care, to implement health surveillance involving hearing checks.

Vibration

Prolonged and repeated exposure to high levels of hand-transmitted vibration (e.g. from the use of hand-held vibratory power tools) can result in damage to:

- Nerves and blood vessels of the fingers and hands
- Musculoskeletal system and nervous system of the upper limbs
- Vibration White Finger
- Carpal Tunnel Syndrome.

Tools which may give rise to a risk include:

- Hand-held grinders (pneumatic and electric)
- Disc cutters
- Power saws
- Jigsaws and drills (particularly those with a hammer action).

The risk of developing a vibration-induced injury largely depends upon the vibration level produced by the tool in question and the amount of time it is used. It is unlikely that occasional short duration use of vibratory tools mentioned above will present a significant risk of injury. However, users, supervisors and management should be trained in use of such equipment together with an understanding of early warning symptoms.

Levels of vibration from tools can be made worst by:

- Inappropriate use of equipment
- Poor maintenance
- Lack of correct PPE
- Pre-existing medical condition.

If persons are likely to be exposed to hand-transmitted vibration on a prolonged and repeated basis, further advice should be sought from the Technical Director who may consult with a Specialist Consultant for further assessment including taking the measurement of levels of exposure to vibration.

4.24 Pressure Systems

Managers and engineers whose field of responsibility includes pressure systems are expected to familiarise themselves with outline guidance on the implications and requirements of the Regulations given in HSE leaflet "*Safe Pressure Systems*". Further information is contained in an Approved Code of Practice and guidance booklet published by the Health and Safety Executive. An approved contractor will carry out the required servicing and inspection regimes in line with regulations.

4.25 Pyrotechnics

Before Pyrotechnics or Special Effects can be used on stage approval must be obtained from the local authority. Such approval should be obtained by the venue ETO are using with a copy of the documentation given to ETO.

ETO will use only qualified designers and operators during a production. ETO will require a detailed method statement including:

- Type of design and manufacture.
- Type of charges to be used.
- Operators name.
- Operating system in detail e.g. *electrical isolation should be provided by the use of a double pole key switch and supplied with a single key. The operator must carry this key when the device is primed or being set. At no time should the key be left unattended in the firing system. The Operator should enable the key switch immediately prior to ignition.*
- Positioning of charge e.g. where will the charge be located in relationship to personnel, scenery and anything else close to the device. As a general rule, no adult should be within 2m of the device when fired and a distance of 3m should be maintained for children.
- Positioning of Operator e.g. The Operator must have direct line of site from the firing position.
- **Stating that the Operator must make the final decision whether or not it is safe to fire the device.**
- Storage arrangements.
- Disposal of unused or failed charges.

Without a detailed and agreed method statement the use of pyrotechnics may be put at risk.

Pyrotechnics are to be stored in accordance with manufacturer's guidelines and ABTT Technical Standards, which state "in their UN certified transport boxes and not transferred to other containers (specifically not steel containments).

4.26 Personal Protective Equipment (PPE)

Personal Protective Equipment Regulations (PPER) 1992, amended 2022.

It is the policy of the Company to protect, as far as is reasonably practicable, all its employees from unnecessary risks to health and safety at work and to comply with the requirements of the Personal Protective Equipment at Work Regulations 1992, amended 2022.

Personal Protective Equipment (PPE) will only be used as a last resort, after all other means of controlling the risks safely have been examined, and it is acknowledged that additional protection is required. This should be designed to protect eyes, feet, head, skin, body.

Under the 2022 amendments, the types of duties and responsibilities on employers and employees under PPER 1992 remain unchanged but are extended to limb (b) workers.

Definitions of limb (a) and limb (b) workers

In the UK, section 230(3) of the Employment Rights Act 1996's definition of a worker has 2 limbs:

- Limb (a) describes those with a contract of employment. This group are employees under the Health and Safety at Work etc Act 1974 and are already in scope of PPER 1992
- Limb (b) describes workers who generally have a more casual employment relationship and work under a contract for service – they do not currently come under the scope of PPER 1992

For more information, please refer to the HSE web page 'Personal protective equipment (PPE) at work regulations from 6 April 2022'

Having identified the PPE requirements, appropriate equipment should be issued to the individuals concerned who in turn must use the equipment correctly when required.

PPE comes in a variety of items including:

- Safety footwear
- Head protection
- Hearing protection
- Fall arrest systems
- Hand protection
- High visibility clothing.

The risk assessment is vital in identifying the correct PPE for the task ensuring:

- Hazards have been identified.
- The PPE protecting the wearer effectively protects against the risks, ensuring that it is suitable for the wearer, fits properly, is compatible with the work and complies with relevant European Community provisions on design and manufacture (i.e. bears the CE mark).
- PPE is provided free of charge.
- PPE is maintained in clean, good working order.
- Replacements are provided as necessary.
- PPE is properly used.
- Employees are informed, supervised and trained in the use of PPE.
- Workers or their union appointed safety representatives are involved in the selection of PPE.

ETO staff will co-operate and comply with hosting venue rules and procedures.

Failure to use PPE when required could result in disciplinary action.

All visitors, contractors and other third parties must use PPE when directed by an ETO representative.

4.27 Risk Assessment

A risk assessment of the buildings and venues ETO tours and ETO's working practice will take place annually or when a change in practice occurs. This will be the responsibility of the General Manager, who may delegate aspects of this risk assessment as appropriate (e.g. to the Production Manager or a designated Fire Officer).

The General Manager will make members of the company aware of any changes made as a result of these assessments. The Risk Assessments are located in the Health and Safety folder on the shared server (accessible to all Employees) and copies will also be made available to tour staff engaged on a project basis via the Artistic Administrator.

The Company will prepare and record (in close collaboration with staff, suppliers, installers, contractors venue staff and management) a Production Risk Assessment relating to the hazards that may occur specifically during the setting up and running of the production, copies of which will be distributed to all personnel as well as the touring.

The risk assessment process is vital in the management of hazards associated with the workplace and activities; legislation places a duty upon the employer to undertake suitable and sufficient risk assessments. Risk assessments can often be a mixture of generic assessments e.g. common hazards – manual handling, specific risk-based assessments e.g. New and Expectant Mothers or dynamic risk assessments undertaken at the time of an event.

However, with all assessments, while ensuring systems are in place to prevent accident and injury it should be remembered to apply common sense and focus on the significant hazards to the specific workplace e.g. location, employees and tasks being undertaken.

The assessments will be undertaken by trained staff that have both a good understanding of the workplace and activities together with the competence to carry out a risk assessment. The risk assessment must record the hazard, controls and risk rating.

Should the assessment indicate further control measures need to be implemented the risk assessment should note this together with the controls required and a time limit upon implementation. Once the control measures have been implemented the risk assessment should reflect the changes.

The completed assessment **MUST** be communicated to all relevant individuals e.g. employees, contractors and other third parties which include the general public.

Effective routes of communication may include:

- Induction for employees.
- Contractor induction.
- Hard copies of the risk assessments in the working area e.g. COSHH.
- Notices and signage.
- Health and Safety committee.

Types of risk assessments may include (but the list is not exhaustive):

- Asbestos
- COSHH
- Display Screen Assessment
- Fire
- First aid
- Lone working
- Manual handling.
- New and expectant mothers
- Pyrotechnics
- Working at Height
- Working with Electricity
- Young People.

Production Risk Assessments

When new productions are brought to a theatre, the Company will liaise with the Production Company and local authority licensing officers, in order to prepare appropriate risk assessments. Should the new production encroach on the Theatre Fabric, the auditorium, the arrangement of seating, installation of lighting or other suspended equipment the Production Manager may inspect the alterations and if necessary, require further specialist risk assessments.

Copies of risk assessments will be kept centrally by the Production Manager. Risk assessments should be available for any worker to consult.

Co-operation with Third Parties

The Company recognises that third parties may require information about the theatre to enable them to complete their own risk assessments. Whilst ETO are willing to provide such information, they cannot advise group organisers on the scope of any Risk Assessment relevant to the needs of their group.

Other bodies who may require sight of the risk assessments could include Enforcement Officers (Environmental Health, Fire Service, HSE or Police) should there be a request for documentation the Office Manager or Technical Director should be informed.

All risk assessments must be reviewed at least annually or following changes to the working environment, staff changes or following an accident or incident.

4.28 Safe Systems of Work

ETO are committed to providing a safe working environment and ensuring systems are in place to identify, provide and maintain safe systems of work for all staff for whom they are responsible.

Employees who are responsible for organising the provision and maintenance of safe systems of work must ensure that any change in a previously established system, or unusual use of plant, is reported to their Line Manager who will arrange for appropriate action to be taken.

Where modifications or changes to machines, guard systems and plant are made which may affect the safety of the unit, the matter should be notified to the Production Manager and General Manager who may seek professional advice before authorising the change.

The Company's safe systems of work and codes of safe practice will be regularly reviewed and, where necessary, revised to reflect new published guidance and/or statutory requirements.

4.29 Smoke and Vapour Effects

If smoke and vapour effects are to be used in a production, the Company will liaise with production staff at the pre-production meeting to ensure that arrangements are made to implement a safe system of work incorporating the aforementioned guidance.

Particular attention will be paid to the risk of carbon-dioxide or other gases/vapours accumulating in poorly or unventilated spaces, thereby causing a dangerous atmosphere.

Where smoke and vapour effects are used the hosting venue will be notified and they will obtain approval from the local authority as appropriate.

The Venue Manager will liaise with the production company and the relevant Local Authority to ensure that approval is sought, demonstrations arranged, and any conditions imposed by the Local Authority are complied with.

4.30 Training

ETO is committed to maintaining the highest standards and therefore it is essential that all ETO employees are fully aware of the obligations placed on the Company and themselves by the Health and Safety at Work Act 1974 and other relevant statutory requirements.

ETO will ensure that all staff are competent in their current role, and that suitable supervision, instruction and training is always provided.

In order to maintain standards, training courses will be arranged where appropriate. The General Director / Head of Production, and all HODs will ensure that all staff receive appropriate training.

All Managers and supervisory staff are required to impart the relevant information to employees.

Training for new employees will also be arranged on a routine basis to ensure that they are fully aware of new legislation, Codes of Practice, risks in the theatre industry and the precautions needed to avoid injury. All new staff will be required to attend induction training which will be carried out by the relevant HOD. See appendix A section 3.

The General Director / Head of Production will carry out a training needs analysis for each department, with assistance of all HODs. This will be carried out annually. In doing this the following will be adhered to:

- Job Specific requirements
- Level of responsibility
- Previous training and experience of employees
- Nature and extent of the risk associated with the work.

A central record of health and safety related training will be kept by the General Director / Head of Production.

When entrusting tasks and allocating work to employees, Management will ensure that the employee's capabilities are taken into account and that the demands of the job do not exceed the employee's ability to carry out the work without care to themselves and others.

The effectiveness of internal and external training will be assessed using the following methods:

- Student feedback.
- Training analysis.
- Ongoing assessment by supervisors.

ETO recognises that continued professional development will play a key role in ensuring competence of all staff.

4.31 The Review Process

The ETO Health and Safety Management (HSMS) is designed in line with the HSE document INDG417 which requires an annual review of the policy and procedures; therefore, in line with legislation the HSMS will be reviewed annually.

The review process will be overseen by the MD in conjunction with:

- General Director
- Head of Production
- HODs.

The terms of reference for the annual review meeting shall be as follows:

- To review and update the ETO Health and Safety Policy Manual
- Review the H&S committee meetings
- To review the previous twelve months' accident reporting statistics, paying particular attention to any emerging trends
- Review all Risk Assessments.

Once reviewed the new Policy and supporting documentation must be communicated to employees.

Documentation Control – all reviewed documentation must contain version number and all previous documents must be returned for disposal.

4.32 Workplace Health, Safety and Welfare

ETO is committed to providing safe workplaces by ensuring, as far as reasonably practical, the following is applied to all workplaces under their management. For ETO employees working in third party venues ETO will ensure the venue is suitable for their employees.

- Adequate standards of heating, ventilation and lighting shall be maintained in accordance with the requirements of the Workplace (Health Safety and Welfare) Regulations.

- Particular attention should be paid to lighting and ergonomic arrangements in situations where visual display units are frequently used. Further details are contained within this policy in the Display Screen Equipment section.
- To ensure safe access, the office layout should be planned in such a way as to provide suitably dimensioned gangways and obstructions such as trailing cables should be avoided by sensible location and/or protection so as to prevent possible tripping hazards.
- Office electrical equipment will be subject to periodic examination and tested by a qualified electrician, to ensure its safety and integrity.
- Floors and stairs should be constructed and maintained so as to minimise tripping and slipping hazards.
- Designated fire escapes must always be kept free from obstructions.
- Manual handling operations will be assessed by the appropriate Manager and remedial action taken to prevent or minimise the risk of injury.
- A visual inspection of office premises and the other venues will be carried out at six monthly intervals by the Head of Production.

4.33 Work-Related Stress

The Company recognises the requirement to protect their employees from the effects of work-related stress by developing and maintaining arrangements for monitoring levels of stress in the workplace. Where necessary, action will be taken to reduce levels of work-related stress. In order to fulfil this responsibility ETO will:

- Identify all workplace stressors and conduct risk assessments to eliminate stress or control the risks from stress. These risk assessments will be regularly reviewed.
- Consult with Trade Union Safety Representatives on all proposed action relating to the prevention of workplace stress.
- Provide training for all Managers and supervisory staff in good management practices.
- Provide confidential counselling for staff affected by stress caused by either work or external factors.
- The company will provide adequate resources to enable Managers to Implement the Company's agreed stress management strategy.

The Company will, as appropriate, periodically monitor levels of stress within the workplace by measuring their performance in successfully managing a range of key stressors. These stressors included:

- Demands
- Control
- Support
- Relationships
- Roles
- Change.

The Company's performance will be benchmarked against the "Management Standards" which are set out in the HSE publication "Tackling Work-Related Stress" and analysis of the results will be undertaken. If necessary, corrective action will be taken to ensure that the Company's performance meets and where possible, exceeds the required "Management Standards".

The General/Production/Office Manager with assistance from HODs will ensure that periodically the above process is conducted within the organisation.

Employees should adhere to the following:

- Raise issues of concern with your Safety Representative, line Manager or occupational health.
- Accept opportunities for counselling when recommended.
- Safety Reps will play the following roles in ETO's stress policy:
- Safety Representatives will be consulted on any changes to work practices or work design that could precipitate stress.
- Safety Representatives must be able to consult on the issue of stress including conducting any workplace surveys.
- Safety Representatives will be involved in the risk assessment process.

ETO has an Equal Opportunities Policy that aims to provide all staff with a safe and inclusive workplace, free from harassment and other causes of stress. You should have your own copy of this policy and refer to it as necessary.

4.34 Working time Regulations / Hours of Work

Broadly speaking, this piece of legislation covers all employees who have not agreed to opt out of the regulations.

The main thrust of the Act is that employees should not work more than 48 hours per week, on 6 days out of the 7, but that the 48 hours may be averaged over a period of 17 weeks, i.e., quite clearly some weeks will be less than 48 hours, whereas others may be more, but over the period, this should iron out to no more than an average of 48 per week.

The 7th day may be breached, and if so, time off in lieu must be given. Many employees have agreed to opt-out of these requirements by signing an Opt-Out Agreement which they may cancel at their own volition at any time, giving 3 months' notice.

For those who **have agreed to opt-out**, there is **no need** to keep a record of their working hours. For those who have **not opted-out** and who are likely in any working week to reach 48 hours, **records must be kept** of the hours actually worked.

Please note:

- These are not hours of overtime, or paid hours.
- They do not include meal or coffee breaks or travelling time.

Individual employees may choose to work in excess of the average 48 hours, in which case they must sign and return a copy of the "opt out" letter.

An employee is entitled to a break of 11 consecutive hours between the finish of one day's work and the start of the next days.

If such a break cannot be given for operational reasons, compensatory rest equivalent to the period of rest not taken shall be given within one month.

An employee is entitled to an uninterrupted period of rest of not less than 24 hours in each 7-day week. If such a break cannot be given for operational reasons, compensatory rest,

equivalent to the period of rest not taken, shall be given within two months. For the purposes of calculating weekly rest, a week starts at Midnight between Sunday and Monday.

4.35 Work at Height (including Safe access)

The duties imposed on ETO by the Work at Height Regulations will be implemented by ensuring that working at height will be:

- 'Avoided' where reasonably practicable
- Properly planned
- Prevention measures in place to minimise the distance and consequences should a fall occur
- Undertaken by trained competent people
- Using suitable equipment
- Appropriately supervised; and
- Carried out in a safe manner.

Access equipment

All employees required to work at height will undergo working at height training.

The working area must be kept clean, orderly and in a safe condition. There must always be suitable and sufficient safe access to and egress from, every place at which any person has at any time to work and the workplace itself must be made and kept safe.

Where work cannot safely be done on or from floor level, or from part of the theatre or other permanent structure, then various types of access equipment are made available and should be properly used strictly in accordance with the supplier's instructions. Equipment may include;

- Lightweight aluminium tower scaffolds, genies, Zarges, Tallescopes, ladders, stepladders and trestles.

ETO will give collective protection measures priority over personal protection measures.

When ladders are used, initially they should be footed and then tied off at the upper resting place, or otherwise secured against both outwards and sideways slipping. Ladders should be inspected for any defects on each occasion before use, and formally by a competent person 6 monthly.

Safety Equipment

Where the risk of a fall cannot be eliminated, work equipment or other measures to minimise the distance and consequences of a fall should be made available including:

- Secure anchor points (tested six monthly)
- Safety harnesses and lanyards.
- Barriers of adequate height and strength
- Ensuring fragile surfaces are identified via the risk assessment
- Signage
- Secure tools and materials
- Segregation below overhead working to prevent persons being struck by falling objects.

All temporary access equipment from which a person could fall and injure themselves will be subject to systematic inspection and examination every 6 months. A register of the report of inspection will be kept at each venue.

SEPTEMBER 2023 POLICY CHANGES		
Page	Section	Brief Description
7	3.2&3.3	Changed the job title 'General Manager' to 'General Director', and 'Production Manager' to 'Head of Production', to match the Organogram. This is reflected throughout the rest of the document.
35	4.25	The PPE section was updated to include the 2022 amendments, specifically relating to limb (b), or casual workers.

SEPTEMBER 2024 POLICY CHANGES		
Page	Section	Brief Description
5	2.0	New Organogram added to document.
14	4.2	Asbestos – production managers responsibility regards touring into venues.
17	4.4	Construction (Design and Management) Regulations 2015 (CDM-2015) – information regarding H&S File.
20 & 21	4.6	Control of Substances Hazardous to Health (COSHH) – extra measures and information added.
24 & 25	4.9	Electrical Safety – adding information regarding BS7909 and PAT.
26	4.12	Fire – added information regards guidance for fire safety.
26 & 27	4.13	Firearms and Weapons Procedures – new section
28	4.15	Highly Flammable Liquids (HFL) and Liquefied Petroleum Gases (LPG) wording added regards distance from external walls required for storage.
32 to 34	4.22	Adding extra information with regards safety process around the use of Machinery and plant.

Appendix A: TOURING POLICY

VERSION	V5
DATE REVIEWED	September 2024

1.0 NOMINATED RESPONSIBLE PERSONS

The following is a list of nominated Responsible Persons for English Touring Opera's Touring Operations.

Responsible Persons are defined in Section 2.2 of this Policy. Their shared Health and Safety Responsibilities, in the areas indicated below, are detailed in Section 3 of this document.

GENERAL DIRECTOR

Senior Responsible Person (administrative) providing liaison with venue management and Producers as required.

HEAD OF PRODUCTION

Senior Responsible Person (production) with whom all Personnel should liaise with Safety Concerns.

COMPANY STAGE MANAGER

Senior Responsible Person for the safety and wellbeing of the full touring company both in the rehearsal rooms and for the duration of the tour. Particular responsibility for the safety and wellbeing of all personnel, and the safe operation of scene changes.

PRODUCTION CARPENTER

Senior Responsible Person (on site during the fit-up and the pre-production period at Hackney Empire) with whom all Personnel should liaise with Safety Concerns. Particular responsibility for scenic and scenery construction during fit up, turnarounds and get outs.

TECHNICAL ASSISTANT STAGE MANAGERS

Particular responsibility for the safe operation of scene changes, effects and scenic and scenery construction during fit up, turnarounds and get outs on tour.

PRODUCTION ELECTRICIAN

Particularly responsible for the safety and wellbeing of all electric's personnel during the fit up and the safe installation of all electrical equipment for the duration of the tour.

TOURING ELECTRICIAN

Particular responsibility for the safe installation of all electrical equipment for the duration of the tour.

WARDROBE MANAGER

Particularly responsible for the safe operation of costume scene changes and the safe running of the wardrobe and wig facilities, for the duration of the tour. Particularly complying with any CoSHH information on all substances used.

ORCHESTRA MANAGER

Particular responsibility for the well-being of the Orchestra and the Orchestra Pit Layout. Responsible for ensuring compliance with the Control of Noise at Work Regulations, 2005.

LEARNING & PARTICIPATION PRODUCER

Particular responsibility for the safety, safeguarding and well-being of young persons in productions on tour. Also, responsible for child licensing and local council liaison, ensuring compliance with child performance and activities licensing legislation.

As per the Health & Safety at Work Regulations, 1999, Health & Safety in the Workplace is a shared responsibility. The Company expects all Personnel to play their part in creating a Safe Working Environment on all projects in which they are involved.

In the event of personnel changes during the tour the incumbents of the above-named positions will be required to assume the Health & Safety Responsibilities detailed herein.

The Company will prepare and record (in close collaboration with staff, suppliers, installers, contractors venue staff and management) a Production Risk Assessment relating to the hazards that may occur specifically during the setting up and running of the production, copies of which will be distributed to all personnel as well as the touring venue.

2.0 SPECIFIC RESPONSIBILITIES OF THE COMPANY

2.1 English Touring Opera (The Company) will ensure that all personnel involved in any aspect of the production are made aware of the existence of this policy.

2.2 The Company will ensure that there is a chain of responsibility for the safety of the work which is proceeding and for the environment in which the work is taking place. This responsibility may be discharged through a person, or persons, (called hereafter the Responsible Persons nominated for the purpose). The Company will establish all methodology by which Responsible Persons in any production can report to the Board of the Company through senior management. Responsible persons shall be experienced in the field for which they have responsibility and may be co-ordinated by a Senior Responsible Person. Responsible persons will be drawn from the normal complement of staff.

2.3 The Company will collect and maintain records of risk assessments and will use these records to produce a consistently growing body of information which will be available with the Policy. Furthermore, the Company will use these records to continually monitor and update its safety policy as well as the awareness of on-going developments noted in 2.7.

2.4 The Company will maintain the safety of its personnel whilst working on the tour and it will seek reassurance from the venue that their own safety policy is being actively and safely pursued. Where this reassurance cannot be provided, it is the Company's policy that its own personnel reserve the right not to become involved with any equipment of the venue. The Company recognises a joint responsibility exists between itself and the managers and operators of venue and will so inform such managers and operators and request their affirmation of this understanding.

2.5 The Company will ensure the safe working of all equipment which its personnel use and will require providers of such equipment, especially on a hired basis, to supply together with the equipment, records of checks made as to the safety of each individual item. Where there is a risk through extensive use over a long period of time, the Company has a responsibility to order the re-testing of appliances, according to the policy of the owners and manufacturers of the aforesaid appliances.

2.6 The Company does not require its personnel to handle any piece of equipment for which they are not trained or qualified so to do. For example, this is especially important in the area of electrical safety where only qualified electrical staff shall affect electrical repairs.

2.7 The Company will provide training and information for its personnel so as to ensure their safe working. The Company will supply its personnel with folders and other means of collating safety information and documentation to build a proper analysis of risk assessment as things occur. The Company will maintain, an awareness of on-going developments regarding Health and Safety in the industry as evidenced by variations to existing, or the arrival of new, regulations and Court cases where precedents become established.

2.8 The Company will provide its personnel with protective equipment and clothing when required. See page 35, section 4.25.

3.0 RESPONSIBLE PERSONS

3.1 The Responsible Person will indicate the existence of this policy to all Company personnel and will outline their responsibilities, not only to the Company, but also to themselves with regard to Health and Safe Working Practices.

3.2 The Responsible Person will monitor and assess all matters regarding the safety of all the Company's personnel. They will report all such matters in writing to a representative of the Board of the Company.

3.3 The Responsible Person will be required to monitor the safety of individuals commencing work. If they have any suspicions that any individual has reduced their capacity to work safely by reason of fatigue, alcohol or drugs, then they are empowered by the Company to stop the individual concerned from commencing work.

3.4 The Responsible Person will ensure that those individuals and organisations contracting services to the Company are fully aware of their responsibilities under the Health and Safety at Work Act and those responsibilities are included in contracts between the Company and the individual or organisation.

3.5 The Responsible Person will ensure that liaison takes place with nominated safety representatives of other organisations alongside whose personnel the personnel of the Company may be working.

3.6 The Senior Responsible Person will liaise with the Company as to the safe operation of the tour. Should conflict of interpretation occur then the matter will be referred to the appropriate level of management.

3.7 The responsible person will ensure that Company personnel are instructed by contractors in the correct use of any item of equipment required for the tour and outside the experience of the said personnel. (See Section 4 for definition of Personnel).

3.8 The Responsible Person will ensure that the policy, below, is followed with regard to the use of access equipment, if the equipment is owned and to be operated by the Company and its personnel. If the equipment is owned and operated by others, the Company will require evidence of a clear policy for use. If none exists, this one should be used.

- a) The equipment will be positively assessed as to its condition before any person from the Company will use it.
- b) It will be established that the floor is free from irregularity or impediment before the equipment is used.
- c) Any castors should be unlocked if the equipment is to be moved with a person aboard before the individual climbs the equipment and outriggers should be extended and left poised above the floor at right angles to the equipment.
- d) Sufficient people trained in the operation of, and risks involved, will be available to handle the base of the equipment to prevent unintentional movement and to ensure stability whilst moving in anyone direction.
- e) Those moving the equipment will be instructed to apply the force near the base and to be clear as to the instructions they receive and the normal stage terminology as to direction.
- f) Where a floor is raked or uneven, the mobile equipment will be adjusted to provide a level platform and only moved in such a way that the platform remains level if a person is aboard. No movement of persons will be allowed on rakes in excess of 1:18.

g) All ladder work above six feet should require that an individual be placed at the bottom of the steps to steady it.

3.9 The Responsible Person will ensure that the operation of any item or piece of equipment is given special attention with regard to risk assessment. The policy of the Company is that nothing should move or be operated without there being an individual who can see the article or artefact moving or being operated throughout the movement.

3.10 The Responsible Person will record the outcomes of Risk Assessments and ensure that the Company has copies of such records (see Section 2.3).

3.11 The Responsible Person will ensure that no activity proceeds unless all the equipment required for such activity is in good working order. Where items need repair, they will be removed and only reinstated when the repair has been completed.

3.12 The Responsible Person will ensure that no risks are presented to those attending the production.

The following items will be checked on each occasion;

- a) The floor surface and construction are appropriate for the activity.
- b) The heating and ventilation are suitable for the activity.
- c) The changing and toilet facilities are accessible, suitable and clean.
- d) All exits are clear and open.
- e) Contractual breaks and times are observed.
- f) Items are correctly handled.
- g) The premises are left secure and tidy.

3.13 The Responsible Person will ensure that there is an appointed individual to oversee the loading or unloading within the transport space and no movement therein should take place without this person clearly instructing for this to happen.

Specifically;

- a) Manual Handling regulations will be adhered to.
- b) The number of personnel in the vehicle will be limited.
- c) The driver of the vehicle will be consulted about distribution and load.
- d) Inexperienced personnel will not be used.

3.14 The Responsible Person will ensure that new personnel are instructed in the techniques of carrying specific items. Trolleys and lifting gear will be made available and should be used for extremely heavy items.

A list of the nominated Responsible Persons engaged on any tour will be drawn up and included in the Health and Safety documentation for that tour.

Although the nominated Responsible Persons have specific responsibilities as per the Health & Safety at Work Regulations, 1999, Health and Safety is a shared responsibility.

4.0 PERSONNEL

4.1 The Company intends this document to refer to all personnel whose relationship with the Company is covered either by a Contract of Employment or a Contract of Service. The said contract or job description being the instrument which will define the areas of the person's responsibility and required skill and knowledge. National or Scottish Vocational Qualifications may be used to indicate these latter areas.

4.2 Personnel will take all reasonable precautions to ensure the Health and Safety of themselves and others who may be affected by their work. The Company regards breaches of this policy as misconduct, which will be proceeded against through existing disciplinary procedures.

4.3 Personnel will inform the Responsible Person of the Company of any fault, risk or hazard and will ensure that their information is correctly recorded in writing.

4.4 Personnel will either notify others or affect an emergency procedure if the movement or the operation of equipment is likely to cause any kind of untoward incident or damage to either other solid artefacts or individuals.

Appendix B RIDDOR Explained

RIDDOR (Reporting of Incidents, Diseases, and Dangerous Occurrences Regulation) requires employers to report certain types of work-related accidents / incidents and ill health affecting employees, contractors, patrons and members of the public to the Health and Safety Executive (HSE); within specified time limits.

Failure or late reporting of incidents to the HSE can lead to enforcement action of either improvement notices or criminal prosecution (fines)












Incidents reportable under RIDDOR include:

Incident Type	Examples	Timescales
Death	<ul style="list-style-type: none"> Fatality of worker or non-worker 	Notify HSE right away, within 24 hrs wherever possible.
Specified Injuries to workers	<ul style="list-style-type: none"> Fractures Amputations Loss of consciousness caused by head injury 	
Over 7-day incapacitation of a worker	<ul style="list-style-type: none"> Over 7day injury – any injury that prevents a person from doing their usual work for greater than 7 days (including weekends and rest days). 	A maximum of 15 days from the date of the incident.
Non-fatal accidents to non-workers e.g. members of the public	<ul style="list-style-type: none"> Accidents to members of the public if they result in an injury and the person is taken directly to hospital for treatment to that injury 	
Occupational Diseases	<ul style="list-style-type: none"> Carpal tunnel syndrome; Severe cramp of the hand or forearm; Occupational dermatitis; Hand-arm vibration syndrome; Occupational asthma; Any disease attributed to an occupational exposure to a biological agent Diseases e.g. certain poisonings, occupational dermatitis, RSI, Hepatitis – as diagnosed by a GP. 	On notification of an employee suffering from work related disease (GPs certificate or hospital letter) - Notify HSE ASAP.
Dangerous Occurrence	<ul style="list-style-type: none"> Failure of load bearing parts of lifts and lifting equipment. Accidental release of any substance which could cause an injury to a person. 	Notify HSE right away, within 24 hrs wherever possible.

NB. These examples are far from an exhaustive list, for further advice refer to the HSE website:

All incidents can be reported online but a telephone service is also provided for reporting fatal and specified injuries **only** - call the Incident Contact Centre on 0845 300 9923 (opening hours Monday to Friday 8.30 am to 5 pm).

Appendix C COSHH ASSESSMENT TEMPLATE









	<h1>COSHH ASSESSMENT</h1>	RA Ref: RA-COSHH-XX
Site: SITE/ VENUE NAME -		Department:
SUBSTANCE NAME <i>(A copy of a current safety data sheet for this substance should accompany this assessment)</i>		
SUPPLIER / MANUFACTURER DETAILS		
Supplier & Manufacturer details, address, emergency contact details (Section 2, MSDS)		
DESCRIBE THE ACTIVITY OR WORK PROCESS		
Describe the activity or work process. (Include how long and how often this is carried out and the quantity of substance used)		
Location of process being carried out?	e.g. workshop	
Identify the persons at risk:	Employees <input checked="" type="checkbox"/>	Contractors <input type="checkbox"/> Public <input type="checkbox"/>
Classification <i>(click in the relevant box to indicate the category of danger)</i>		
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
Hazard Type		
<input type="checkbox"/> Gas	<input type="checkbox"/> Vapour	<input type="checkbox"/> Mist
<input type="checkbox"/> Fume	<input type="checkbox"/> Dust	<input type="checkbox"/> Liquid
<input type="checkbox"/> Solid	<input type="checkbox"/> Other	
Route of Exposure		
<input type="checkbox"/> Inhalation	<input type="checkbox"/> Skin	<input type="checkbox"/> Eyes
<input type="checkbox"/> Ingestion	<input type="checkbox"/> Other (state)	
Workplace Exposure Limits (WELs) <i>please indicate n/a where not applicable</i>		
Long-term exposure level (8hrTWA) - N/A		Short-term exposure level (15 mins): - N/A
State the Risks to Health from Identified Hazards		
<ul style="list-style-type: none"> • Risks to health as listed on MSDS • Risks to health as listed on MSDS 		

Control Measures: (for example extraction, ventilation, training, supervision). Include special measures for vulnerable groups, such as disabled people and pregnant workers.

- Control measures as listed
- Control measures as listed

Is health surveillance or monitoring required?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
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Personal Protective Equipment (state type and standard)

	<input type="checkbox"/>	Dust Mask		<input type="checkbox"/>	Visor / Faceshield
	<input type="checkbox"/>	Respirator		<input type="checkbox"/>	Goggles
	<input type="checkbox"/>	Gloves		<input type="checkbox"/>	Overalls
	<input type="checkbox"/>	Safety Footwear		<input type="checkbox"/>	Apron

First Aid Measures

General First Aid Measures:
Include if listed on MSDS – otherwise, delete this row.

If substance is swallowed:	In case of contact with eyes:
As detailed in section 4 of MSDS	As detailed in section 4 of MSDS
In case of contact with skin	In case of Inhalation or respiration
As detailed in section 4 of MSDS	As detailed in section 4 of MSDS

Fire Fighting Precautions (What actions should be taken in the event of a fire involving this substance)

Suitable Extinguishing Media
As detailed in section 5 of MSDS.

Advice for Firefighters:
As detailed in section 5 of MSDS.

Storage: How the substance should be stored

- As detailed in section 7.2 of the MSDS

Disposal of Substances & Contaminated Containers

Hazardous Waste Skip Return to Supplier Other Dispose of in accordance with local waste regulations

Is exposure adequately controlled?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
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Risk Rating Following Control Measures			
High	<input type="checkbox"/>	Medium	<input type="checkbox"/>
		Low	<input checked="" type="checkbox"/>
Training: Have persons using this substance received training and instruction on the risks and controls?			<input checked="" type="checkbox"/> YES
Assessed by: Assessor Name			Date:
			Review Date:

N.B. Retain this document for 6 years