

HEALTH AND SAFETY POLICY



WEST BROMWICH ALBION FOOTBALL CLUB June 2021 – June 2022



Procedure Date

| Implementation Date | June 2021 |
|---------------------|-----------|
| Review Date | June 2022 |

Version History

| Version | Date | Reason for Change | Amended/ Agreed By |
|---------|----------|--|-----------------------|
| 1.1 | 17/05/21 | Annual review and associated changes. | CH & MM |
| | 17/05/21 | Additional role and responsibilities of the HR Manager | CH & MM |
| | 17/05/21 | Additional role and responsibilities of the Senior Safeguarding Group Officers | CH & MM |
| | 27/05/21 | Terminology changes to Safeguarding arrangements section | CH & MM |
| | 29/07/21 | Additional role and responsibilities of the Academy Health & Safety Coordinator | CH & MM |
| | 02/02/22 | Appointment of new CEO | CH & MM |
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West Bromwich Albion Football Club

Health and Safety Policy

June 2021 - 2022



West Bromwich Albion Football Club Health and Safety Policy

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West Bromwich Albion Football Club Health and Safety Policy

Part 1

Statement of Policy



Health and Safety Policy Statement

West Bromwich Albion is committed to achieving the highest standards of health and safety throughout its business; as such we will, as a minimum, comply with any relevant Occupational Health and Safety Legislation and any other standards or requirements related to the industry we work in.

We consider the management of health, and safety & well-being to be integral to the good management of our business and decision making and are fully committed to the continual improvement of our health and safety performance.

West Bromwich Albion will, so far as is reasonably practicable:

- (a) provide adequate control of health, safety & well-being risks, including the safeguarding of children and adults at risk arising from our work activities and maintain safe and healthy working conditions.
- (b) identify all risks and hazards created because of our work and undertakings.
- (c) prevent where reasonably practicable, accidents, injuries, and cases of work-related ill-health.
- (d) provide suitable and sufficient health and safety related information, instruction, and training.
- (e) provide and maintain safe plant, equipment and other facilities required by employees and others working under our control.
- (f) ensure the safe handling, transportation, storage or use of substances in the workplace.
- (g) ensure that health and safety and fire safety plans are developed and maintained.
- (h) consult with employees and others affected by our activities on matters relating to occupational health & safety, well-being and the safeguarding of children and adults at risk.
- (i) ensure that all employees and managers understand their responsibilities in respect of occupational health and safety, well-being and the safeguarding of children and adults at risk.
- (j) communicate our policy and arrangements for health, and safety & well-being to all employees including arrangements for safeguarding of children and adults at risk.
- (k) promote health, safety & well-being awareness to create a positive health and safety culture.
- (I) promote equality within the club, and affiliated organisations, through the way we manage the club and provide services to fans, customers, partners, and the community.
- (m) comply with legal and other requirements for occupational health, and safety & well-being including the safeguarding of children and adults at risk.
- (n) ensure that adequate resources are made available to manage health, safety & well-being and provide appropriate processes and procedures for health and safety.
- (o) annually review and revise our Health and Safety policy to ensure it remains appropriate to our business activities and consistent with all relevant legislation.
- (p) apply processes and systems for managing health, and safety & well-being that ensure we continually improve our performance.

Ron Gourlay - Chief Executive, West Bromwich Albion

Feb 2022

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West Bromwich Albion Football Club Health and Safety Policy

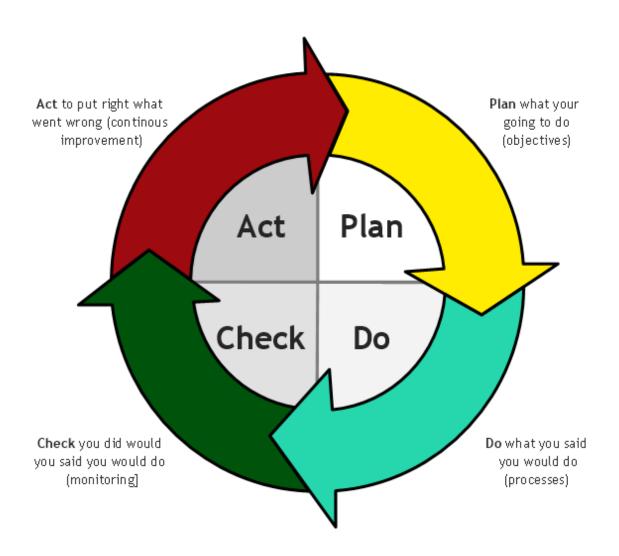
Part 2

Introduction, Organisation & Responsibilities

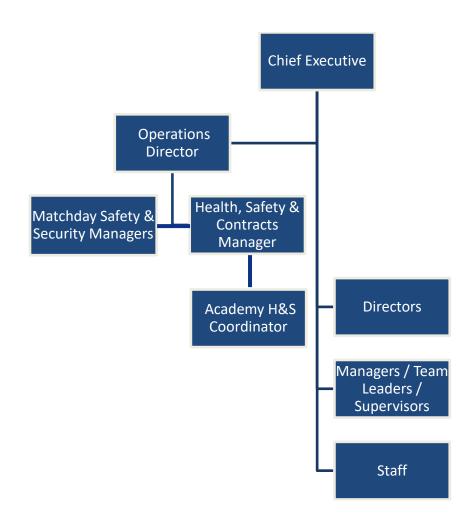
Introduction

West Bromwich Albion's Health & Safety management system is based upon the requirements of the Management of Health and Safety at Work Regulations 9 (as amended), the Health and Safety Executive publication "Successful Health and Safety Management (HSG65)

All based on the Plan-Do-Check-Act model as also advocated in the Institute of Directors/HSE publication "Leading Health and Safety at Work".



Health and Safety Organisation Structure





Notes

This chart demonstrates Health, Safety & Security management reporting lines.

Responsibilities

The Chief Executive

The Chief Executive has overall responsibility for health and safety in West Bromwich Albion Football Club and for ensuring so far as is reasonably practicable that the Board of Directors is adequately informed on health and safety matters.

The Chief Executive of West Bromwich Albion Football Club undertakes to provide sufficient competent staff and to provide, maintain and test effective safety management systems to ensure the safe admission, accommodation and exit of spectators at all times the ground is in use.

The Chief Executive is responsible for implementation of the Health and Safety Policy, for liaison with the Board, and for securing the necessary resources to implement the Policy.

The Board of Directors

The Board of Directors has executive responsibility for health and a safety matters in the company and for ensuring so far as is reasonably practicable that the Health and Safety Policy is applied in all areas of the business.

The Board of Directors is collectively responsible for providing health and safety leadership and for ensuring so far as is reasonably practicable that decisions made are consistent with the Policy Statement. It will satisfy itself that competent resources exist to manage health and safety and that adequate resource is made available for the Policy to be implemented.

The Board of Directors of West Bromwich Albion Football Club undertake to ensure as far as reasonably possible that all premises and facilities at The Hawthorns Stadium are constructed, maintained, and checked in such a way that as far as is practicable the safety of everybody at the stadium is assured.

Operations Director

The Operations Director is responsible for the formulation of the Health and Safety Policy, for identifying the required resources to formulate the Policy, for formulating the business – wide strategy for health and safety and competency management and training and for ensuring so far as is reasonably practicable the adequacy of the systems, communication and facilities for health and safety in the business.

The Operations Director also undertakes Match Day responsibilities as documented in the West Bromwich Albion Safety Policy for Spectators and is responsible for monitoring the effectiveness of the Spectator Safety Policy and its communication to all employees.

Senior Safeguarding Lead

Senior Safeguarding Lead is a Board Level position and is responsible for liaison with the Board Members, for identifying the required resources to formulate the Safeguarding Policy and with assistance from the Head of Safeguarding formulating the business – wide strategy for Safeguarding.

The Senior Safeguarding Lead is also responsible for the formulation, development, and leadership of the club Senior Safeguarding Group.

Director of Media & Communications

The Director of Media & Communications is responsible for formulating the business – wide media and communications strategy, for health and safety and competency management and training for that department and its impact upon associated roles, responsibilities, and arrangements.

Other General Health & Safety Responsibilities

Several other individuals have specific responsibilities in the delivery of the requirements of this policy. These are as given below:

Match Day Operations Manager

The Match Day Operations Manager is responsible for being in overall control of operational safety & security management issues on an event day. On non-event days, the Match Day Operations Manager is the principal adviser to all ground management on all spectators – related safety. The Match Day Operations Manager will further support and, where required, deputise for the Safety & Security Manager to undertake Match Day security responsibilities. Further detailed Match Day responsibilities as documented in the West Bromwich Albion Safety Policy for Spectators

Safety & Security Manager

The Safety & Security Manager is responsible for being in overall control of operational security management issues on event days. On non-event days, the Safety & Security Manager is the principal adviser to the club with regards to security related safety. The Safety & Security Manager will further support and, where required, deputise for the Match Day Operations Manager to undertake Match Day responsibilities as documented in the West Bromwich Albion Safety Policy for Spectators.

Health, Safety & Contracts Manager

The H, S & Contracts Manager is responsible for managing the specialist health and safety resources in the business, for providing the systems and procedures for health and safety, for providing advice on occupational health and safety matters, and for implementing a programme of inspections and assessments. He is responsible for implementing the company's business-wide strategy for health and safety and H&S related competency management and training.

The H, S & Contracts Manager is also responsible for the development and implementation of efficient and effective processes and systems to enable the business to comply with all relevant health and safety management requirements. This includes the management and monitoring of all contracted service providers and associated activities.

Facilities / Maintenance Manager

The Facilities / Maintenance Manager is responsible for managing the specialist trade and facilities related resources in the business and with assistance from the H, S & Contracts Manager for developing and implementing facilities related safe systems of work, and relevant method statements and risk assessments in relation to facilities and its associated activities. The Facilities / Maintenance Manager is responsible for implementing any relevant and facilities related company strategy for health and safety and for the facilities team related H&S competency management and training requirements.

The Academy Manager.

The academy manager shall have responsibility for the management and functions of West Bromwich Albion Football club youth Academy. This will include compliance with all regulatory bodies' instructions and guidelines, including the FA, Premier league and EFL. They shall have responsibility for related safe systems of work, and relevant method statements and risk assessments in relation to the Academy and its associated activities. The academy manager shall also for health and safety and competency management and training for that department.

Academy Health & Safety Coordinator

The Academy H&S Coordinator is responsible for responsible for raising health and safety awareness within the Academy, for signposting staff to the Club systems and procedures for health and safety, for assisting staff in accessing advice on occupational health and safety matters, and for monitoring an internal programme of inspections and assessments. The Academy H&S Coordinator will monitor and assist in the implementation of the Club's and Academy's business-wide strategy for health and safety and H&S related competency management and training.

The Academy H&S Coordinator will assist the Club H, S & Contracts Manager and the Club Facilities Manager in the development and implementation of efficient and effective processes and systems to enable the Academy to comply with all relevant health and safety management requirements. This includes the management and monitoring of all contracted service providers and associated activities.

Disability Access Officer

The Disability Access Officer is responsible for ensuring the club is up to date with existing legislation and is the main point of contact between the Football Club and its disabled supporters to ensure that their access requirements are met.

Promotes the needs of disabled people to the Club and "champions" disability issues and ensures that professional access audits take place where required, and that specialist training takes place.

The Disability Access Officer is also responsible for the development and implementation of efficient and effective processes and systems to enable the business to comply with all requirements.

Head of Safeguarding

The Head of Safeguarding is responsible for providing reports to the Senior Safeguarding Lead on the effectiveness of the Club's Safeguarding provision, the associated policies, and procedures as well as football regulatory requirements for safeguarding.

The Head of Safeguarding is also responsible for the Safeguarding competency management and training for relevant staff and for ensuring so far as is reasonably practicable the adequacy of the systems, communication, and promotion of safeguarding in the business.

The Head of Safeguarding is also responsible for the formulation, development, and leadership of the club Senior Safeguarding Group.

Safeguarding Operations Group Members

To support the WBAFC Board, the nominated WBAFC Safeguarding Lead and the WBAFC Designated Head of Safeguarding in providing strategy, direction and implementation of the safeguarding plan and the club's vision and values.

Safeguarding Officers

Safeguarding Officers are responsible for assisting the Head of Safeguarding in discharging the clubs safeguarding responsibilities and in promoting and raising safeguarding awareness both in the club and the community.

Human Resources Manager

The Human Resources Manager guides and manages the overall provision of Human Resources services, policies, and programs for the club.

The major areas the Human Resources Manager can include recruiting and staffing, organisational planning, performance management and systems, employment and compliance with regulatory requirements, employee onboarding, development needs and training, policy development and documentation, compensation, and benefits administration, assisting the HS&C Manager with regards to employee welfare, mental health, and wellbeing, employee services and counselling.

Managers

All managers whether employed in an operational or support services capacity – are responsible for ensuring so far as is reasonably practicable that the Health and Safety Policy, and good health and safety practices, are applied in areas for which they are responsible and must ensure so far as is reasonably practicable the effective management of health and safety risks including those associated with contractors and service providers.

All managers will ensure so far as is reasonably practicable that training records and health assessment records are stored safely.

All managers will also assist with the management of disciplinary action where necessary for breaches of health and safety rules or failure to comply with this Policy.

Office Administration Staff

The Office or Site Administration staff supports local management in the implementation of health and safety good practice and assists in communications between the business and the Health, Safety & Security Management.

Employees

Every employee is responsible for ensuring so far as is reasonably practicable their own health and safety, for complying with the requirements of the Health and Safety Policy, and for ensuring so far as is reasonably practicable that their acts or omissions do not affect the health and safety of others. Employees must report accidents, near-misses, or unsafe conditions and ensure so far as is reasonably practicable that they comply with the requirements of all relevant method statements and risk assessments.

Other Specific Health & Safety Responsibilities

Several other individuals have specific Covid-19 / Pandemic roles and responsibilities in the delivery of the requirements of a separate WBAFC Covid-19 Policy and supporting documentation.

The specific roles, responsibilities, organisation, and arrangements for Covid-19 are detailed within the: West Bromwich Albion Football Club Coronavirus / Covid-19 Policy and available upon request.

All Supporting documents are located and maintained within the WBA Health & Safety System. WBAFC Covid-19 Policy WBAFC Covid-19 General Risk Assessment WBA Covid-19 Return to Work Risk Assessment WBA Covid-19 Return to Training Risk Assessments WBAFC Behind Closed Doors Risk Assessments WBAFC Return of Spectators Risk Assessments



West Bromwich Albion Football Club Health and Safety Policy

Part 3

Arrangements

Arrangements

Scope

These health and safety arrangements and the West Bromwich Albion Occupational Health and Safety management system will apply to all West Bromwich Albion employees and others working under its control and or affected by its activities, regardless of work location and / or Operating Business.

1. Health and Safety Policy Review and Objectives

West Bromwich Albion will monitor the effectiveness of this Policy. Review of the Health and Safety performance of West Bromwich Albion and the functioning of the Policy is the responsibility of the Operations Director and the Club Health, Safety & Contracts Manager. The Operations Director and the Club Health, Safety & Contracts Manager will review the contents of the policy document annually, or where changes in legislation or company guidance requires changes to be made and identify ways in which company health and safety performance can be improved.

The Operations Director and the Health, Safety & Contracts Manager shall establish corporate occupational health and safety objectives, because of the review, for relevant functions and levels within West Bromwich Albion.

The objectives shall be measurable, timely and such objectives shall ensure legal compliance and meet industry requirements. These objectives will be reviewed at regular and planned intervals.

The Operations Director and the Health, Safety & Contracts Manager shall monitor the suitability, effectiveness, implementation, and achievement of these objectives.

The Spectator Safety policy will be subject to review at the end of each season by Operations Director and Match Day Safety & Security management and circulated amongst the Club Board of Directors.

Such reviews will assess changing risk, evaluate performance considering any accidents or incidents including any undesired circumstances which have the potential to cause accidents.

All Supporting documents are located and maintained within the WBA Health & Safety System. H&S Management Review Procedure Safety Policy for Spectators

2. Communication, participation and consultation with employees, and others working under its control and or affected by its activities.

To comply with relevant legislation and encourage participation, shared knowledge and best practice, West Bromwich Albion will consult and communicate with employees and others working under its control and or affected by its activities on matters affecting their health and safety.

Employees are encouraged to make suggestions that may improve health and safety within the Company. These may be made to Operations Director and the Health, Safety & Contracts Manager.

Management is, where applicable, responsible for ensuring that effective consultation with Trades Union/Non-Trades Union Health and Safety Representatives and staff is established and maintained in accordance with any appropriate legislation.

The Club will endeavour to maintain communications with the public/spectators by the following methods:

- Information in match programmes
- Club publications
- Social Media
- Public Address System
- Video Boards
- Encouragement of Stewards in Customer Care
- The Club will encourage feedback from all sources both within and outside the Club.

With Other Agencies

The Club will provide facilities for both pre- and post-match briefing between the Club and emergency or other external services. The Club will endeavour to provide representation at the appropriate level for all meetings with such services. The Club will encourage liaison with agencies through joint exercises, planning and exchange of information.

All Supporting documents are located and maintained within the WBA Health & Safety System. Employee Communication, Participation & Consultation Procedure Safety Policy for Spectators

3. Compliance Management

To maintain a healthy and safe working environment, competent persons will carry out any necessary health and safety compliance audits & inspections to give advice on the requirements of the relevant statutory provisions, compliance with this policy and health and safety matters generally.

All Supporting documents are located and maintained within the WBA Health & Safety System. Compliance Management Procedure

4. Legal and other requirements

The legal and other requirements relevant to services and activities carried out by the business are identified in the Legal and Other Requirements Register maintained by the Health, Safety & Contracts Manager.

The Head of Safeguarding carries out specific legal and other requirements aligned with Safeguarding and Vulnerable Groups

These are reviewed regularly in accordance with procedure and significant changes and consultations communicated and consulted on with the business through the local coordinator networks.

For individual projects or jobs, any other environmental, legal, or other requirements are identified within the project specific documents at the planning stage.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Compliance Management & Health & Safety Legal Register

Associated Safeguarding Policies, Procedures and process

5. Monitoring and Measurement

Procedures are in place to monitor and measure any of West Bromwich Albion's activities which could have a significant effect on health & safety requirements, including compliance with legal requirements, measurement of performance indicators, operational controls and achievement of objectives and targets.

Internal Inspections

The Health, Safety & Contracts Manager has overall responsibility for determining and delivering the H&S monitoring programme.

The Health, Safety & Contracts Manager shall carry out regular internal H&S inspections and compliance evaluations and maintain a schedule for planned visits. H&S inspection and compliance assessments of all West Bromwich Albion controlled property and premises are carried out by the Health, Safety & Contracts Manager

Nonconformity, Corrective and Preventative Action

Collated data and information are reviewed periodically and any resulting or identified preventative actions are carried out as appropriate.

Corrective action is taken following any identified non-conformance with the requirements of the occupational health and safety management system or the identification of the potential for a non-conformance.

Any person who is assigned a Corrective Action Response (CAR) ensures identified actions arising from audit or local monitoring are managed, and reports on progress and effectiveness of these to the business.

The Club will operate a system whereby all systems and equipment used as part of the safety function are subject to continuous inspection and test. The frequency of inspections and tests will be not less than that advised by equipment manufacturers or statutory requirements. Competent persons will be used to carry out such inspections or tests. The result of all inspections and tests will be recorded.

The result of all inspections, tests, ongoing safety reporting and recording systems which make up the risk analysis, structural, mechanical, and electrical surveys will perform part of the annual policy review required to maintain its general Safety Certificate.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Internal Audit & H&S Planned Activities Schedule Safety Policy for Spectators

6. H&S Management System Review

Health & Safety is a standard agenda item at senior management team meetings. Potential for risks, hazards or opportunities are reviewed at these meetings with input provided by the Facilities / Maintenance Manager, the Operations Director, and the Safety & Security Management.

A wider H&S management system review is carried out on a regular basis by the Health, Safety & Contracts Manager.

All staff performing a safety function will be encouraged to participate actively in achieving an effective system of overall safety. Through a system whereby staff are continuously briefed and debriefed on the assessment of risk, analysis of risk or injury and any incidents which occur it is expected that the achievement of the overall safety policy will be monitored at all levels within the above organisational structure.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Management Review Procedure Safety Policy for Spectators Safeguarding Policies & Procedures Coronavirus / Covid-19 Stadium Operations Policy

7. Training and Information

The Director or Manager responsible for each project, department or office is to ensure that any specific H&S training needs are identified, and appropriate training arranged in consultation with the Operations Director and or the Health, Safety & Contracts Manager and, where applicable, employee representatives, to ensure competency of employees and persons working under their control.

Specific levels of H&S training will be initially set at business level and further by the departments in consultation with the Operations Director and or the Health, Safety & Contracts Manager. Training will also be provided if new technology or new working methods are introduced.

All new employees will be given an initial health and safety induction relevant to their roles and activities undertaken within one week of the commencement of employment and will be advised of emergency procedures on their first day.

All employee records of H&S training or related competency requirements (relevant to their roles and activities) are held either electronically via the company training and competency system, or within local hard copy files.

For Match-Day operations the Club will, via the Operational Safety & Security Management recruit, train to a minimum standard of NVQ level 2 in Spectator Control and maintain a sufficient number of trained stewards to meet its obligations under legislation at all times. The main objective of the stewards is to ensure the safety of all and provide a high level of customer service.

The Head of Safeguarding ensures training and competency requirements are aligned with Safeguarding and Vulnerable Groups

All Supporting documents are located and maintained within the WBA Health & Safety System.

Health & Safety Training and Competence Procedure Safety Policy for Spectators Associated Safeguarding Policies, procedures, and process

8. Accidents - Incidents Reporting and Investigations

All employees will report all incident types; Injury / III Health, Near Miss, Damage to Property / Equipment & Safety Observations that occur in connection with West Bromwich Albion work activities, or for which West Bromwich Albion could be held responsible and will be reported however trivial the injury or near miss may appear.

All required H&S statutory reports will be made on behalf of the company by the Health, Safety & Contracts Manager in liaison with the relevant Management.

The Head of Safeguarding carries out specific investigations aligned with Safeguarding and Vulnerable Groups and is responsible for producing associated reports both statutory and non-statutory.

Only trained and competent persons will carry out investigations of H&S incidents, in liaison with the Health, Safety & Contracts Manager.

Match-Day incident reporting will be managed by the Operational Safety & Security Management and or the Operations Director as per the Safety Policy for Spectators.

All Supporting documents are located and maintained within the WBA Health & Safety System. Accidents, Incidents Reporting & Investigating Procedure Match Day Incident Report Form First Aid Procedure WBA Significant Incidents (SI) Guidance Safety Policy for Spectators Coronavirus / Covid-19 Stadium Operations Policy Associated Safeguarding Policies, Procedures and process

9. First-Aid

To comply with relevant legislation, West Bromwich Albion will adopt, as a minimum, the levels of first-aid provision indicated in such legislation and or Approved Codes of Practice. Additional provision will be made where further need is identified.

For specific Match-Day First Aid provision then the Club will ensure for the provision of reasonable medical, ambulance and first aid cover at all events. Further details can be found within the medical plan.

The Club will employ a crowd doctor who will be trained and competent to deal with emergencies at the ground. The Club will engage the ambulance service at a level appropriate to the event.

The Club will provide facilities for the use of First Aid personnel and engage an appropriate number of qualified officers for each event.

All Supporting documents are located and maintained within the WBA Health & Safety System. First Aid Procedure WBA Appointed First Aiders Document and Defibrillator Appointed Persons Document Accidents, Incidents Reporting & Investigating Procedure Match Day Incident Report Form WBA Significant Incidents (SI) Guidance Safety Policy for Spectators Coronavirus / Covid-19 Stadium Operations Policy

10. Work Equipment (PUWER) and Lifting Operations (LOLER)

West Bromwich Albion will ensure that all equipment provided, for use at work, will comply with the requirements of relevant legislation and lifting operations planned.

The responsible Manager / Purchaser is to ensure that all work equipment hired or purchased for use by our employees is suitable for the purpose for which it is to be used. They shall also ensure that, where necessary, procedures are established and maintained, related to any occupational, health and safety risks to the goods, equipment and services purchased and or used and that such procedures are communicated to employees, suppliers and or contractors.

When selecting equipment, you shall:

- Use the most suitable equipment.
- Choose new or nearly new equipment, ensuring the avoidance of old continually repaired equipment.

Where tools or equipment are issued to employees and / or persons working under their control, for their use, those employees are responsible for ensuring that the item is kept in good working order and that any defects are reported.

West Bromwich Albion understands the dangers that lifting operations and working with lifting equipment can pose to human life. They accept the duties and responsibilities passed on to it by relevant legislation in managing and protecting its workforce and others who may be affected by lifting operations and lifting equipment.

It is our policy no untrained or unauthorised persons are to carry out lifting operations or work with any form of lifting equipment where there is a significant or high risk of injury or damage as a result.

Managing the purchase, inspection, maintenance, servicing and use of lifting equipment within the workplace and ensuring lifting equipment is being managed within buildings that either West Bromwich Albion owns, leases, or otherwise occupies for day-to-day business activities is the responsibility of ether the relevant hiring / purchasing management or the Facilities / Maintenance Manager.

Any relevant lifting equipment, inspection and testing must be carried out by a qualified competent person.

All Supporting documents are located and maintained within the WBA Health & Safety System. Work Equipment (PUWER) & Lifting Operations & Lifting Equipment (LOLER) Procedure Low Risk Equipment Form

PUWER Inspection & Maintenance Template

11. Hazard Identification and Risk Management

West Bromwich Albion places a high value on maintaining a healthy and safe working environment for all its employees. We are committed to providing a safe working environment that maintains and promotes the health and well-being of all its employees.

West Bromwich Albion equally places a high value on providing and maintaining a healthy and safe working environment for all children and vulnerable groups. We are committed to meeting all requirements for Safeguarding.

By implementing a hazard identification and risk assessment policy that fulfils all relevant legal duties and requirements we aim to eliminate or control significant hazards that may arise because of activities both inside and outside of the workplace.

West Bromwich Albion management shall ensure that ongoing hazard identification and the assessments of the risks associated with all work activities are undertaken, as required by relevant Regulations.

Responsible Managers have a duty to focus on real risks and to protect both people and our business by eliminating those risks.

Where we identify that risks remain and these activities cannot be avoided, we will assess the potential for work related ill health and or risk of injury, damage, or loss from both internal and external activities. We will also assess the potential impact from human capabilities and other human factors and then reduce the likelihood of those risks occurring and the severity of the outcome to its lowest possible level, so far as is reasonably practicable, by the implementation of suitable and sufficient control measures.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Hazard Identification and Risk Assessment

12. Control of Hazardous and Dangerous Substances.

West Bromwich Albion understands and accepts its duty and responsibility to ensure that any purchase, use, storage, handling, and transportation at work of hazardous and / or dangerous substances are planned and are controlled by means of an assessment process. That suitable information is provided on the risks from hazardous and dangerous substances and the correct action to be taken when using them.

It is the duty of the responsible Manager to ensure that all substances that pose danger to human life or the environment are assessed prior to use and that all those who may be affected are provided adequate information and control measures to prevent that harm.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Hazardous & Dangerous Substances (COSHH) COSHH Assessment Form COSHH Guidance

13. Fire Management

West Bromwich Albion aims to provide a healthy and safe working and sporting environment by implementing a Fire Management procedure for all its employees and premises throughout the organisation.

The Club will always endeavour to minimise the danger and effect of fire.

This will be achieved by carrying out regular risk assessments in conjunction with the Fire Authorities and SMBC to identify the nature, level, and significance of the risk from fire, so that wherever possible such risk will be removed, reduced, or contained. A professional risk assessment is undertaken by a competent external consultant each year.

The Club will maintain a policy of acting upon any advice of the Fire Authorities / SMBC given and employing specific fire stewards, maintaining an efficient fire detection system, keeping litter to the minimum and enforcing no smoking throughout the stadium and premises.

All Supporting documents are located and maintained within the WBA Health & Safety System. Fire Management Policy Fire Management Plan Fire Management Procedure Fire Evacuation Procedure – EPPP Emergency Evacuation Plan Stadium Non-Match Days Emergency Evacuation Procedures - Training Ground Fire – Security Fire Alarm & Equipment Appointed Fire Marshalls

14. Lone Workers

West Bromwich Albion, wherever practicable, aims to prevent accidents, occurrence of injuries, ill health, and near misses relating to lone working and the associated activities, however where these do arise, we aim to not only fulfil any legal responsibilities, but also to ensure that a process of learning has taken place and measures put in place to prevent a reoccurrence.

Where the conditions of service delivery or its associated tasks require staff to work alone, individual staff members and Managers have a duty to assess and, where practicable, prohibit lone working and or reduce the risks which lone working presents.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Lone Working Procedure

15. Display Screen Equipment (DSE)

West Bromwich Albion understands that the use of Display Screen Equipment (DSE) has the potential to cause harm to the user if not controlled and managed.

West Bromwich Albion aims to control this issue by ensuring the completion of a user assessment carried out at the workstation. All DSE users will carry out a specific DSE assessment relevant to the equipment being used.

Once completed, a trained and competent assessor will identify any issues which have the potential to cause harm and address them by reporting them to the users' Manager immediately with suggested remedies or referring them to the Health, Safety & Contracts Manager for further assistance. It is the relevant line managers' responsibility to ensure that this process, as outlined above, is undertaken.

To aid in compliance and prevention of ill-health, all DSE users are entitled, and encouraged to undertake free eye examinations and, where identified for the specific use on DSE, free eye wear will be provided.

It is the employee's responsibility to ensure any issues regarding their DSE use are relayed to their line manager or the trained and competent DSE assessors.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Display Screen Equipment Procedure Display Screen Equipment Guidance Coronavirus / Covid-19 Stadium Operations Policy

16 Occupational Road Risk

West Bromwich Albion, wherever practicable, aims to prevent accidents, occurrence of injuries, ill health, and near misses relating to occupational vehicular use and or travel. However, where these do arise, we aim to not only fulfil any legal responsibilities of reporting, but also to ensure that a process of learning has taken place and measures put in place to prevent a reoccurrence.

West Bromwich Albion has a "Driver Awareness Policy" that sets out the requirements for the use and maintenance of company owned vehicles (cars, light commercial vans and minibuses) provided by the company and for the use of employees. The responsibilities of those employees identified as the keeper of a company vehicle or vehicles are set out in the policy. The responsibilities of all employees who use a company vehicle are also described.

West Bromwich Albion vehicles will be maintained at the manufacturer's recommended service intervals.

Keepers and users of company vehicles are responsible for carrying out routine checks as specified in the vehicle's documentation and the Driver Awareness Policy. They are responsible for reporting any defects that are hazardous or could prevent the vehicle from being roadworthy. No employee is permitted to drive a vehicle thus deemed not to be roadworthy.

Drivers of company vehicles are expected and informed to drive in a safe, non-aggressive and considerate manner in compliance with road traffic legislation. Care is to be exercised when carrying passengers on company business.

No person driving on company business will be expected to travel an excessive distance or to travel for an excessive time. Where necessary, support will always be given to sensible journey planning and for the costs of overnight accommodation. This will be monitored and enforced by the user's manager.

Hand-held mobile phones are not to be used whilst driving.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Occupational Road Risk and Driver Awareness Procedure Coronavirus / Covid-19 Stadium Operations Policy

16. Stress

West Bromwich Albion places a high value on maintaining a healthy and safe working environment for all its employees and it recognises its duty of care extends to mental health as well as physical health at work. By implementing a stress management procedure, we aim to control or eliminate stress within the workplace. A risk assessment will be produced, where required, in the business to identify control measures which once implemented will actively remove or reduce the stressors identified.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Stress Policy & Stress Management Policy, Procedure and Guidance Occupational Health Procedure Coronavirus / Covid-19 Stadium Operations Policy

17. Drugs and Alcohol

Alcohol and drug misuse detrimentally affect the abilities of the individual to carry out their duties in a safe and competent manner, thus increasing the risks to themselves and others.

It is the intention of West Bromwich Albion that any instance of a worker found to be under the influence of alcohol or drugs will be deemed as gross misconduct and subject to strict disciplinary action.

However, West Bromwich Albion accepts an individual's dependence on alcohol or drugs is an illness and the same provisions and treatments will be given in these cases as to any other illness.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Drugs & Alcohol Policy & Drugs & Alcohol procedures and Guidance

18. Contractual Duties and Contractors

West Bromwich Albion will be required, at times, to employ contractors during its operations. When required we will ensure that they are competent to carry out such tasks in a safe and effective manner.

We understand that it is the responsibility and duty of West Bromwich Albion to control and monitor the work activities of the contractors and communicate and inform on matters of health and safety. We aim to achieve this using our vendor assurance procedure and active contractor management. The primary responsibility in managing contractors and their associated activities will rest with the contractors Hiring Manager, with assistance from the Health, Safety & Contracts Manager.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Contractor Management Procedure Contractor Induction Document Vendor Evaluation Form Contractors Signing in Form Coronavirus / Covid-19 Stadium Operations Policy

19. CDM Compliance and Health and Safety in Design

Managers responsible for the management of planning, design and implementation of construction works are to ensure that those employees who carry out project work in the roles of Principle Designer and or Principal Contractor, have received specific training in their duties. Managers must also ensure that duty holders have sufficient experience and understanding to ensure that their duties are carried out in a competent manner.

The guiding principles for all designs prepared by West Bromwich Albion will be to ensure that all designs avoid risks to health and safety so far as is reasonably practicable, to reduce risks to their lowest level where avoidance is not possible, and to include relevant information with the design. Only persons competent to produce designs will be permitted to do so.

Those preparing designs will alert Clients to the duties that they have under relevant regulations and follow the designer's duties as defined within those regulations.

Where problems arise or there are lessons to be learned from any project, any employee who acts as Principal Designer or Principal Contractor is encouraged to bring such information to the notice of their Manager so that the information can be disseminated throughout West Bromwich Albion.

All Supporting documents are located and maintained within the WBA Health & Safety System.

20. Electrical Safety

West Bromwich Albion understands the dangers that electricity and working with electricity can pose to human life. We accept the duties and responsibilities passed on to us by relevant legislation in managing and protecting our workforce and others who may be affected by electricity.

It is our policy no untrained or unauthorised persons are to work on any form of live electrical equipment where there is a significant or high risk of electrocution or injury as a result.

Managing the purchase, inspection, maintenance, servicing and use of electrical items within the workplace and ensuring electrical wiring systems / supply is being managed within buildings that either West Bromwich Albion owns, leases, or otherwise occupies for day-to-day business activities is the responsibility of the management.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Electricity at Work Procedure

Guidance on Electricity at Work

21. Working at Heights

West Bromwich Albion understands the dangers that working at height can pose to human life. We accept the duties and responsibilities passed on to us by relevant legislation in managing and protecting its workforce and others who may be affected by working at height activities.

It is our policy no untrained or unauthorised persons are to carry out working at height activities or work with any form of access equipment and or working platform where there is a significant or high risk of injury or damage as a result.

The relevant Managers shall manage the purchase, inspection, maintenance, servicing and use of access equipment and or working platform within the workplace.

Any access equipment and or working platform, inspection and testing must be carried out by a qualified competent person.

All working at height activities must be accompanied by a risk assessment. The relevant Managers are responsible for ensuring risk assessments are in place and may require the input from the Health, Safety & Contracts Manager or employee carrying out the task.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Working at Height Procedure Working at Height Guidance Harness Checklist MEWP Checklist

22. Asbestos

West Bromwich Albion understands the dangers that asbestos fibres pose to human life. We accept the duties and responsibilities passed on to it by relevant legislation in managing and protecting its workforce and others who may be affected by asbestos.

Managing or ensuring asbestos is being managed within buildings that either West Bromwich Albion owns, leases, or otherwise occupies for day-to-day business activities is the responsibility of either the relevant Office / Property / Premises Manager or the WBAFC Facility Manager.

We presume the presence of asbestos within premises / sites until otherwise confirmed by a competent person.

All Supporting documents are located and maintained within the WBA Health & Safety System. Asbestos

23. Smoking

It is the policy of West Bromwich Albion that smoking / vaping is prohibited in all offices, company vehicles and enclosed workplaces. Responsibility for enforcement of smoking controls lies with the appropriate Manager.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Smoke-free Workplace Guidance

24. Manual Handling

West Bromwich Albion understands the risk of injury presented by manual handling operations. Where possible West Bromwich Albion will eliminate the need for manual handling operations, where this is not possible these operations will be assessed, and significant findings recorded.

All employees are to undergo basic training in manual handling activities and more detailed and specific training will be undertaken by those identified in need. The relevant manager is responsible to ensure that suitable and sufficient assessments are in place to adequately control manual handling activities.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Manual Handling Procedure Manual Handling Guidance

Manual Handling Assessment

25. Confined Spaces

West Bromwich Albion acknowledges the dangers to life when carrying out its activities in confined spaces.

West Bromwich Albion will ensure before any activities are carried out within confined spaces a suitable and sufficient risk assessment is carried out and the activity is planned, carried out and led by trained and competent persons. All those planning and carrying out confined spaces activities will have undergone specific training in this type of activity and work to the practices prescribed in all relevant legislation and Approved Codes of Practice. The Line Managers in charge of such activities will ensure that this is carried out.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Confined Space at Work

26. Visitors

We endeavour to ensure that all those who visit our offices or site locations, and their health and safety are not compromised at any time. All visitors to West Bromwich Albion will be always escorted by an employee of West Bromwich Albion and be made known of any foreseeable significant risks before they undergo their visit. All visitors will report to WBA Reception/s to sign in / out.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Safety Policy for Spectators Emergency Evacuation Plan Stadium Non-Match Days Emergency Evacuation Procedures - Training Ground Visitors Signing In Sheet Coronavirus / Covid-19 Stadium Operations Policy Customer Charter Safeguarding Vulnerable Adults Child Protection Policy

27. Personal Protective Equipment

Situations will exist where, despite implementing reasonably practicable precautions to eliminate or minimise hazards to employees, Personal Protective Equipment (PPE) will be necessary to safeguard the health, safety, and welfare of employees.

West Bromwich Albion, through their responsible managers, will provide suitable and sufficient PPE where an assessment has identified it as a 'last resort' to protect against risks to health and safety. Engineering controls and safe systems of work to remove the risk will always be considered first.

All Supporting documents are located and maintained within the WBA Health & Safety System. Personal Protective Equipment Procedure PPE Register (Individual) Coronavirus / Covid-19 Stadium Operations Policy

28. Occupational Health

West Bromwich Albion places a high value on maintaining a healthy and safe working environment for all its employees and / or others. We are committed to ensuring that the potential for ill health arising from activities or premises controlled by West Bromwich Albion or exposed to because of activities carried out by West Bromwich Albion, are minimised at source to the lowest level that is reasonably practicable.

West Bromwich Albion recognises the importance of integrating the continuous improvement of health and wellbeing into the organisational activities and will aim to ensure early identification and management of occupational ill health ranking it equal with other operational considerations.

West Bromwich Albion will provide internally or obtain externally competent specialist occupational health advice, assistance, and services to all its employees.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Occupational Health Procedure

Guidance on Occupational Health

Employment Health Questionnaire

Coronavirus / Covid-19 Stadium Operations Policy

29. Emergency Preparedness, Security & Threat, Planning & Reporting

As a high-profile organisation West Bromwich Albion are aware that there has been an increase in terrorist activity in the UK and the world in general.

The Home Office advises that the public should always remain vigilant regardless of the current national threat level.

Precautions must be in place so that any such incidents may be dealt with, should they arise.

The purpose of this policy is to help to assess the Club's vulnerability to the threat of terrorism, to put in place risk reduction procedures, safe evacuation procedures and a security threat response. This also applies to bomb threats and suspicious packages, which could contain explosive or harmful biological material.

Operational Safety & Security management and relevant managers shall ensure through communication, participation, and consultation that employees understand what to do in case an emergency arises.

The Club will take all reasonable steps to identify all possible types of emergency or system failure that could occur at the ground whilst spectators are in the stadium and prepare contingency plans to deal with such incidents.

Where such incidents could lead to a major incident the Club will brief the emergency services and work with them to ensure that these plans are compatible and adequate.

The Club will document such plans and test their effectiveness on a regular basis through exercise and review.

All employees shall ensure they understand the procedures for reporting Emergency Incidents.

| All Supporting documents are located and maintained within the WBA Health & Safety System. |
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| Hazard Identification and Risk Assessment |
| Emergency Evacuation Plan Stadium Non-Match Days |
| Emergency Evacuation Procedures - Training Ground |
| Accidents, Incidents Reporting & Investigating Procedure |
| Incident Report Form |
| WBA Significant Incidents (SI) Guidance |
| Safety Policy for Spectators |
| Emergency Evacuation Plan Stadium Non-Match Days |
| Emergency Evacuation Procedures - Training Ground |
| Hostile Vehicle Mitigation Policy |
| Marauding Terrorist Policy |
| Bomb Threat / Suspect Package |
| Key Holders Policy |
| Key Request Form |
| Logging of Security Reception Keys |
| Fire – Security |
| Coronavirus / Covid-19 Stadium Operations Policy |

30. Workplace environment

Managers in control of workplaces shall always ensure that the environment that they and others in their control work, is a safe and healthy environment.

Employees shall ensure that they protect the health, safety, and welfare of both themselves and others by reporting incidents and always maintaining good housekeeping standards.

Hazards shall be identified, reported, and immediately controlled through regular inspections and audits and diligence by all working within the workplace.

All Supporting documents are located and maintained within the WBA Health & Safety System. Compliance Management Safety Policy for Spectators Hazard Identification and Risk Assessment Emergency Evacuation Plan Stadium Non-Match Days Emergency Evacuation Procedures - Training Ground Accidents, Incidents Reporting & Investigating Procedure Incident Report Form WBA Significant Incidents (SI) Guidance Coronavirus / Covid-19 Stadium Operations Policy

31. Vibration

Managers, in conjunction with the Health, Safety & Contracts Manager shall identify any work activities and or work equipment that may expose employees and or those under their control to hazards and risks related to hand arm vibration and or whole-body vibration.

Where these risks and hazards are identified and recorded, Managers shall ensure, where reasonably practicable, these activities are prohibited.

Where this is not reasonably practicable, Managers, in conjunction with the Health, Safety & Contracts manager shall ensure that procedures and control measures are implemented, enforced, and monitored to control this risk to levels determined by relevant legislation and industry best practice.

All Supporting documents are located and maintained within the WBA Health & Safety System.

32. Noise

Managers in conjunction with the Health, Safety & Contracts Manager shall identify any work activities and or work equipment that may expose employees, external parties and or those under their control to hazards and risks related to noise.

Where these risks and hazards are identified and recorded, Managers shall ensure, where reasonably practicable, these activities are prohibited.

Where this is not reasonably practicable, and Managers in conjunction with the Health, Safety & Contracts Manager shall ensure that procedures and control measures are implemented, enforced, and monitored to control this risk to levels determined by relevant legislation and industry best practice.

All Supporting documents are located and maintained within the WBA Health & Safety System.

33. Food Safety Management

As a food business operator West Bromwich Albion take a risk-based approach towards food safety and implements a food safety management system. This is based on the Hazard Analysis Critical Control Points (HACCP) and safer food, better business principles.

The relevant management shall ensure that all food handling staff has adequate training or be instructed and supervised to ensure that food is handled safely.

In most cases Level 2 Food Safety qualifications are sufficient but supervisors and managers shall aim for Level 3.

The person responsible for developing and maintaining the food safety management system shall have adequate training in the application of the Hazard Analysis Critical Control Points (HACCP) principles. This may be through experience and previous knowledge or a Level 2 course in HACCP.

All Supporting documents are located and maintained within the WBA Health & Safety System.

34. Hydrotherapy Pools and Facilities

West Bromwich Albion aims to provide first class support / medical facilities for use by its playing staff.

This policy aims to identify several control measures in place to ensure that the usage of the hydrotherapy suite is safe and controlled.

It has been determined that the usage of the hydrotherapy suite is only to be used by the following persons:

- 1st Team squad players
- Development squad

No other persons (staff, Academy, youth etc.) are permitted to use the facilities at any time.

All Supporting documents are located and maintained within the WBA Health & Safety System. Hazardous & Dangerous Substances (COSHH) COSHH Assessment Form COSHH Guidance Legionella Guidance Coronavirus / Covid-19 Stadium Operations Policy

35. Young Persons and Adults at Risk

WBA recognises that for many young people the workplace will be a new environment and they will be unfamiliar with 'obvious' risks and the behaviour expected of them in response.

Young people might need additional support to allow them to carry out their work without putting themselves and others at risk, and this might mean more tailored training and/or closer supervision. Regularly checking a young person's progress helps the club to identify where any additional adjustments may be needed. Where required and appropriate WBAFC will put age limits on the use of some equipment and machinery.

WBA also recognises that the wellbeing of children and adults at risk is an important and shared responsibility. The Club's Child Protection Policy and Safeguarding Adults at Risk Policy are fundamentally designed to assist and support everyone at the Club in providing a safe and friendly environment.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Hazard Identification and Risk Assessment

Managing Young Persons Procedure

Managing Young Persons Guidance

Child Protection Policy

Safeguarding Children & Adults at Risk Documentation

Coronavirus / Covid-19 Stadium Operations Policy

36. H&S Inductions

Induction is an essential part for new recruits and familiarising them with WBA. As an employer, WBA understands our staff is our most important asset. Induction gives us the chance to welcome new employees and build on their positive attitude and enthusiasm for their new job. It's an opportunity to familiarise new members of staff with our organisation and to introduce them to their immediate colleagues and other members of the wider workforce and our organisation's policies on areas such as health and safety, equality and discrimination.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Induction Procedure Guidance on Induction Induction forms (employees and Contractors)

37. Working overseas and travel

To ensure that WBAFC manage and assess the additional risks that may be presented by staff travelling and working overseas and where management is managing those staff and activities. Where reasonably practicable WBAFC will eliminate the risks, where this is not possible all risks are assessed, significant findings recorded, and control measures put in place with the aim to bring the risks down to the lowest practicable level.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Travelling & Working Overseas Procedure Travelling Abroad Guidance Managing Employees Overseas Guidance Travel Notification forms (employees only) Coronavirus / Covid-19 Stadium Operations Policy

38. Match Day / Event Safety Management

West Bromwich Albion recognises the responsibilities and high value placed on maintaining a healthy and safe sporting environment for all its cleared personnel. We are committed to providing an environment that maintains and promotes the health and well-being of all and meeting all legal and statutory authority requirements for safe stadia.

By implementing robust match day / event plans, processes and procures that fulfils all relevant legal duties and requirements we aim to eliminate or control significant hazards that may arise because of activities both inside and outside of the stadia where and when required.

West Bromwich Albion match day safety and security management ensure that ongoing hazard identification and the assessments of the risks associated with hosting matches and events is undertaken and reviewed as and when required.

All Supporting documents are located and maintained within the WBA Health & Safety System.

Hazard Identification and Risk Assessment Procedure Matchday Operational Plan (BCD), risk assessments & processes Security and Terrorism Plans Match Day Incident Report Form Safety Policy for Spectators