Ref	PL/012
Version	5

Refusal to Work Policy

This statement sets out the policy of Universal Group, in respect of “Refusal to work on the grounds of Health & Safety” by all employees (or sub-contractors, if appropriate).

A copy of the above referenced document is held by the signatory of the policy statement in the main offices of Universal Group, should a fuller interpretation be required and forms the basis for the following synopsis.

All employees referred to above are to be made aware of the contents of this policy and become familiar with the conditions laid down.

Universal Group will take all reasonable measures to ensure that those are made aware of the contents of this policy and that it will not affect their continued employment by the company in the event of any invoking of this policy.

Universal Group will take all reasonable measures to prevent, so far as is reasonably practicable, any invocation placed on any person by this policy by planning safe working conditions and taking all factors into account. Employees of Universal Group will at all times exercise diligence in monitoring their safe working environment for themselves and other employees in the working area.

It is a condition of employment with the company that all employees shall comply with the following:

- If any situation arises which an employee believes will or has resulted in an unsafe working environment for some or all they must immediately draw it to the attention of their direct line manager so he can investigate and resolve the issue locally, if possible.
- If the situation gives rise to serious or imminent danger, or if line management cannot be immediately contacted, then employees must stop work, retire to a place of safety and report it immediately. Warn others who may be exposed to the same danger of the concerns you have.
- Double check that there are no instructions or information available locally to resolve the issue.
- Do not recommence work until management have been alerted and the situation addressed.
- If the line manager does not support your concerns, or there is any conflict or disagreement, escalate the concern through the line manager or on-call manager chain. The case can be escalated up to and including the Managing Director, will normally make the final decision; application to external sources may be consider, e.g. ACAS.
- Ensure that you are clear in describing what the concerns or issues are.
- Employees must only raise a refusal to work where they have a genuine concern for health, safety, or welfare. Where this is the case, all employees can raise a refusal to work without fear of discrimination. No employee will be subject to any disciplinary action or suffer any detrimental or punitive action, even if the concern is ultimately seen to be unfounded.

Further to the Universal Group processes for refusal to work on the grounds of health and safety, all staff engaged in the railway infrastructure have a facility for reporting any safety concerns into a central, confidential reporting system, CIRAS (Confidential Incident Reporting & Analysis System)

CIRAS is an alternative way for rail industry staff to report safety concerns that they feel unable to report through company safety channels. It is a completely independent and confidential way to report safety concerns without fear of recrimination.

Reports can be made by Free phone 0800 4 101 101, by writing to Freepost CIRAS, or via the CIRAS Website at www.ciras.org.uk

All welfare and first aid facility related issues must be addressed by the company to ensure that their operators are supported in line with the appropriate legislation defining the facility required and who is to provide them, in line with the attached form.

This policy will be reviewed annually, as a minimum.

Signed
Richard Lowe
Managing Director

Dated 01/11/2026