



Window Management Policy

This procedural document supersedes: CORP/HSFS 28 v.2 Window Management Policy



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Amendment Form

Please record brief details of the changes made alongside the next version number. If the procedural document has been reviewed **without change**, this information will still need to be recorded although the version number will remain the same.

Version	Date Issued	Brief Summary of Changes	Author
Version 3	July 2022	<ul style="list-style-type: none"> • Update to Roles and Responsibilities Flow Chart and amendment of the roles and responsibilities • Update Monitoring Compliance with the Procedural Document. 	Sean Tyler
Version 2	31 May 2019	<ul style="list-style-type: none"> • Update to Roles and Responsibilities Flow Chart and amendment of the roles and responsibilities. 	Sean Tyler
Version 1	12 April 2016	<ul style="list-style-type: none"> • This is a new procedural document, please read in full. 	Sean Tyler

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1 INTRODUCTION

This procedure deals with the ongoing safe and secure use and maintenance of opening and fixed glazed external windows to building elevations and the safety of fixed internal glazing.

Specific Legal Requirements

Section 8 of Health and Safety at Work etc. Act 1974 - Duty not to interfere with or misuse things provided pursuant to certain provisions.

No person shall intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety or welfare in pursuance of any of the relevant statutory provisions.

Workplace (Health, Safety and Welfare) Regulations 1992 and ACOP including:

- Regulation 14 Windows, and transparent or translucent doors, gates and walls.
- Regulation 15 Windows, skylights and ventilators.
- Regulation 16 Ability to clean windows etc. safely.

The Building Regulations 2010 as amended and Approved Documents.

NHS Requirements

- NHS 'No Never Event' 15. Falls from unrestricted windows.
- Health Building Note 00-10 Part D: Windows and associated hardware.

Other Requirements

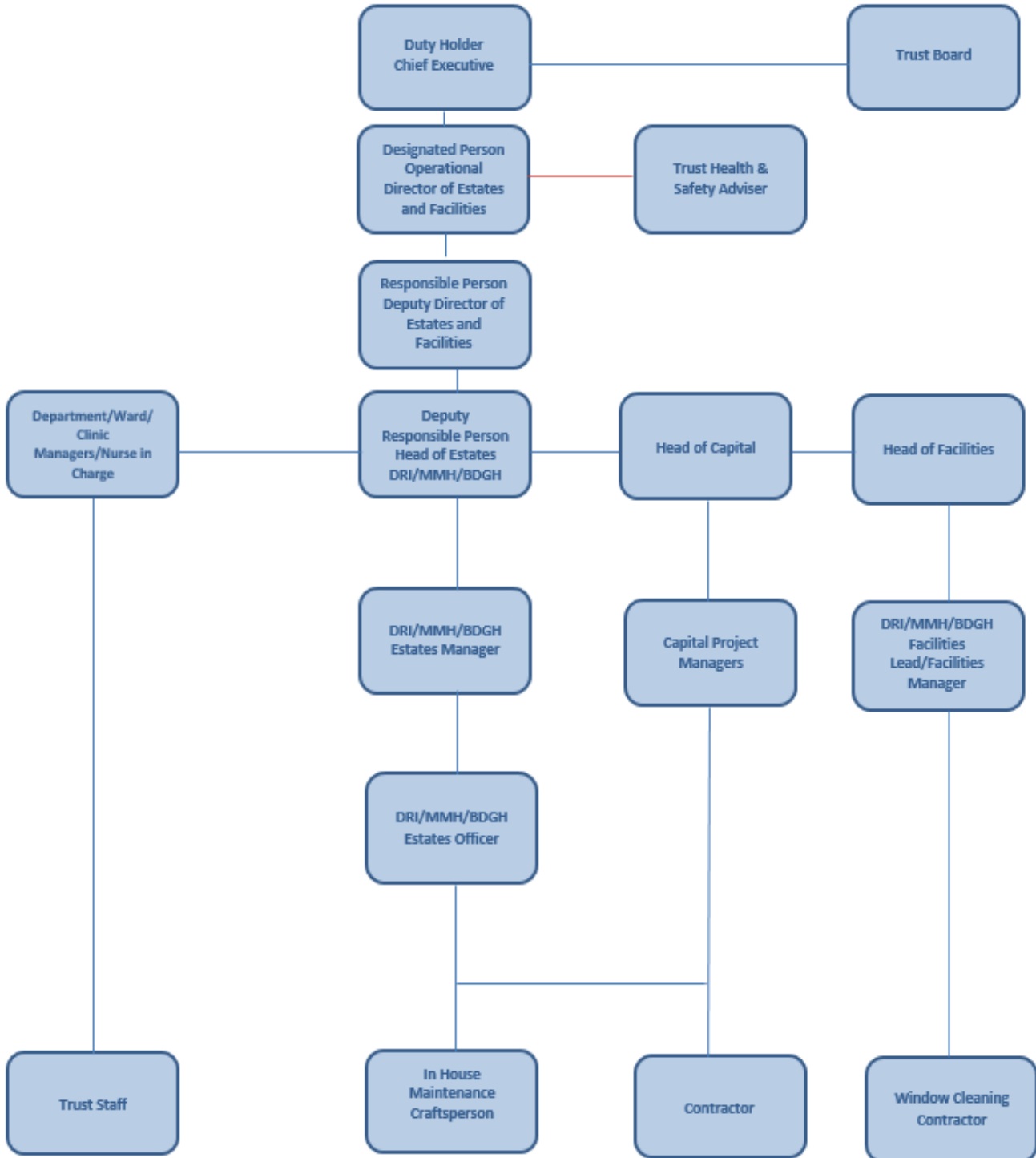
- BS 6262-4:2005 Glazing for buildings - COP for safety related to human impact.
- BS 6375-1:2015 Performance of windows and doors, Classification for weather tightness and guidance on selection and specification.
- BS 6375-2:2009. Performance of windows and doors, Classification for operation and strength characteristics and guidance on selection and specification.
- BS 6375-3:2009+A1:2013. Performance of windows and doors, Classification for additional performance characteristics and guidance on selection and specification

2 PURPOSE

To ensure external windows and internal glazing perform safely, securely and for the comfort and benefit of service users.

3 DUTIES AND RESPONSIBILITIES

WINDOWS MANAGEMENT - STRUCTURE



3.1 Duty Holder

The Chief Executive is the Statutory Duty Holder. The Duty Holder and the Trust Board have overall responsibility for the Trusts Window Management and Health and Safety.

3.2 Designated Person

The Designated Person is appointed by the Duty Holder and is responsible for the organisational arrangements, to ensure compliance with all Statutory Regulations, Guidance, and Approved Codes of Practice. Will provide the coordination between Estates and Clinical functions to ensure effective implementation of the Trust Window Management Policy.

3.3 Responsible Person

The Responsible Person is appointed by the Designated Person to act as the Senior Operational Manager. Will be responsible for the management of identified risks and for providing advice with regard to the Statutory Regulations, Guidance and Approved Codes of Practice.

Responsible for the set up and review risk assessments for windows and glazing including management action planning.

3.4 Deputy Responsible Person

The Deputy Responsible Person is appointed by the Responsible Person and will deputise for the Responsible Person as required duties as above. Will be responsible for the overall review of the Window Management Policy, training and incident management, Risk Assessments, Risk Action Plans, and remedial works and programmes.

3.5 Estates Managers/Estates Officers

Ensure all windows and glazing complies with this policy.

Ensure the planned preventative maintenance regime for external windows including routine inspections and training is undertaken, documented, and recorded on the PLANET system.

Conduct or assist with accident/incident investigations relating to external windows.

3.6 Capital Project Managers

Carry out external window and internal glazing design, specification, procurement, and installation within legal, NHS requirements and this policy.

Exchange external window maintenance information with Estates Managers.

Conduct project hand-over checks of all windows, including existing, within the project area for:

- Window restrictor hardware including opening gaps.
- Window blind cord/chain safety devices.
- Impact safe glazing and guarding.

3.7 Department/Ward/Clinic Managers

To include safety and security checks of external windows and internal glazing within normal routine operations.

To promptly report any defects to the estates department for action.

3.8 Head of Facilities

Ensure Head of Service Department is aware of and complies with the Trust Window Management Policy and safe systems of work, when employing window cleaning contractors on all Trust sites.

3.9 Facilities Lead/Facilities Manager

Ensure external window cleaning contractors are conversant with and comply with the Trust Window Management Policy and safe systems of work, listed in section 4.5 of the policy – External Window Cleaning Requirements.

Ensure all procedures listed and documentation (Estates and Facilities Window Cleaning Checklist, [Appendix 1](#)) are complete by the contractor following completion of the works.

Ensure all complete window checklists are passed to the asset coordinator in the estates department to input onto the PLANET system with any remedial works identified for further action.

3.10 In-House Maintenance Craftsperson

Ensure all windows and glazing complies with the external window maintenance requirements of this policy.

Ensure all windows are maintained following planned preventative maintenance regime, work instructions for windows provided through the PLANET system.

3.11 Trust Staff and Contractors

As section 8 of the HSWA 1974, not to disengage, interfere with, misuse or in any way override window restrictor hardware provided in the interest of safety, except under a safe system of work.

3.12 Window Cleaning Contractor

Ensure all window cleaning work activities comply with the Trust Window Management Policy and safe systems of work, listed in section 4.5 of the policy – External Window Cleaning Requirements.

Ensure a procedure/process is incorporated into the safe systems of work for disengaging and re-engaging window restrictor hardware when undertaking window cleaning duties as listed in section 4.5 of the policy – External Window Cleaning Requirements and is included in all RAMS provided to the Trust.

Ensure all procedures listed and associated documentation (Estates and Facilities Window Cleaning Checklist, [Appendix 1](#)) are fully complete, following completion of the works and passed to the Trust Service Manager.

4 PROCEDURE

4.1 Risk Assessments

Reference: Policy CORP/RISK 30 - Risk Identification, Assessment and Management Policy and H&SRAF - Health and Safety Risk Assessment Form.

The Responsible Person shall instigate and conclude a review risk assessment of the following hazards. This shall be done as a minimum annually but always following any related accident or incident. The conclusion of these assessments shall determine a management action plan for the implementation and monitoring of all and any control measures prescribed by the assessments.

Windows and Glazing

- Falling from vulnerable service users climbing through open windows
- Falling out of open windows from slips, trips and falls
- Falling out of open windows from sitting on a windowsills
- Falling through glazing from slips, trips and falls
- Impact with glazing
- Strangulation from looped cords and chains on window blinds

Specific Locations/Openings

There may be need to carry out specific risk assessment and control measures for the likes of Mental Health Units or individual window openings.

4.2 Safety Control Measures - Window Restrictor Hardware

Where an opening window light requires restriction, this shall be achieved with a mechanical restrictor and associated hardware that fulfils the following:

- Conform to BS EN 14351-1 + A1 and BS EN 13126-5.
- Be fitted to limit the movement of an opening light so that an opening of not more than 100 mm is achieved at any point, this may require multiple restrictors.
- Be internally surface mounted cable type with key operated override to disengage and be visible when the opening is closed.
- Be suitably robust to prevent vulnerable and determined adults from forcing them open beyond the 100 mm restriction or defeating with the use of simple tools, e.g., cutlery.
- To exceed the test requirements of BS EN 14351-1, to hold a window in place for 60 seconds when a static load of 350 newton's is applied to that window.
- Be of the appropriate design and type to match the window style and construction materials.
- Be mounted with tamper proof fixings.
- Only be disengaged by means of a removable key.

For existing window openings where this can't be fully achieved, e.g., critical windows, then the use of a permanently fitted non removable internal or externally mounted block fixed to the building structure can be used that limits the swing of the opening to not more than 100 mm.

For Mental Health Units there shall be consideration of possible ligature points created by fitting window restrictor hardware. If required a specific risk assessment can be carried out for the Mental Health Unit detailing the specific hazards and alternative control measures to prevent people from climbing or falling out of window openings. This assessment shall be sent to the Director of Estates for inclusion in the review process under section 4.1.

4.3 Safety Control Measures - Impact with Glazing

All glazing in external walls to windows and curtain walling below 800 mm from floor level shall be full height guarded. Robust glazing shall not be used as guarding. All guarding shall be constructed with consideration to children & vulnerable adults and the high usage of mobile equipment, wheeled beds/trolleys, and powered tugs.

All glazing in critical locations in internal and external walls is to be impact safe for people moving in or about buildings. Critical locations are as shown in diagram 5.1 of Building Regulations Approved Document K. Impact safe glazing shall be achieved in one of the following ways.

- Break safely
- Robust
- Small panes
- Permanent Screen Protection

All control measures shall comply as a minimum to Building Regulations Approved Document K.

4.4 Safety Control Measures - Window Blind Controls

All new window blind controls in patient or public areas and family accommodation shall be wand or motorised types with no loose cords or chains.

All existing window blind controls in patient or public areas and family accommodation with loose cords or chains are to be fitted with a gather or tension devices to prevent any strangulation risk to children or vulnerable adults.

4.5 External Window Cleaning Requirements

Disengaging Window Restrictor Hardware - Safe Systems of Work-Do Not Leave Windows Unattended Whilst the Hardware is Removed

Regarding section 7 of the HSWA 1974, general duties of employees at work and section 8 of the HSWA 1974, all window restrictor hardware is provided in the interest of safety.

All window cleaning contractors shall incorporate a procedure/process into their safe systems of work for the disengaging and re-engaging of window restrictor hardware for window cleaning activities. Details of this procedure/process or subsequent revision shall be submitted to the Trust for their records prior to any work.

If cleaning of windows requires the disengaging and re-engaging of window restrictor hardware the cleaning contractor shall sign out keys from the Estates department for the duration of the cleaning works and sign these back in with the completed form as Appendix 1 to show all window restrictor hardware has been re-engaged and checked.

4.6 External Window Maintenance Requirements

Planned Preventative Maintenance Regime

Estates Managers shall set up a regime to inspect and repair external windows for the following:

- General condition
- Operation, manual and automated
- Draught seals
- Condensation drainage
- Window restrictor hardware and restriction gaps
- Lubrication

Annual window inspections shall be carried out under the above regime to all external windows. Each inspection and findings shall be recorded on the Estates Asset Management System: PLANET.

Reported Defects

Defects relating to window restriction hardware shall be given priority and resolved within 24 hrs. Windows that can't be resolved at first attendance shall be securely shut until the defect is resolved.

Defects relating to external glazing shall be given priority and resolved within 24 hrs. Glazing higher than the ground level storey (internal sill below 1200mm) that can't be resolved at first attendance shall be made safe until the defect is resolved.

All other reported defects shall be attended to and resolved as normal reactive maintenance items.

Disengaging Window Restrictor Hardware - Safe Systems of Work Do Not Leave Windows Unattended Whilst the Hardware is Removed

Regarding section 7 of the HSWA 1974, general duties of employees at work and section 8 of the HSWA 1974, all window restrictor hardware is provided in the interest of safety.

If through maintenance activities window restrictor hardware is disengaged or replaced, then a safe system of work must be established to prevent people from climbing or falling out of window openings during the activity.

5 TRAINING/SUPPORTMaintenance Staff

All maintenance staff shall be briefed by their supervisor/manager on the Planned Preventative Maintenance Regime/Safe Systems of Work and demonstrated a normal window inspection including disengaging and re-engaging window restrictor hardware.

6 MONITORING COMPLIANCE WITH THE PROCEDURAL DOCUMENT

What is being Monitored	Who will carry out the Monitoring	How often	How Reviewed/ Where Reported to
Risk Assessments	Estates Managers/Officers	Annually or after accident/incident	Document review. It will then be passed to the Head of Compliance, the Estates and Facilities Health and Safety (H&S) Committee, Estates and Facilities Committee (EFC) and the Trust H&S Committee for verification/approval.

Maintenance Regime	Head of Estates	Annually or after verified complaint/incident	Review Schedules/Areas & Checklists
All window or blind installations, new or existing	Capital Design/ Project Managers	On project completion	Project hand-over checks of new and existing

7 DEFINITIONS

Window Restrictor - As Health Building Note 00-10 Part D: Windows and associated hardware, paragraph 2.23 Terminology.
Else as normal dictionary definitions.

8 EQUALITY IMPACT ASSESSMENT

The Trust aims to design and implement services, policies and measures that meet the diverse needs of our service, population, and workforce, ensuring that none are disadvantaged over others. Our objectives and responsibilities relating to equality and diversity are outlined within our equality schemes. When considering the needs and assessing the impact of a procedural document any discriminatory factors must be identified.

An Equality Impact Assessment (EIA) has been conducted on this procedural document in line with the principles of the Equality Analysis Policy (CORP/EMP 27) and the Fair Treatment For All Policy (CORP/EMP 4).

The purpose of the EIA is to minimise and if possible, remove any disproportionate impact on employees on the grounds of race, sex, disability, age, sexual orientation, or religious belief. No detriment was identified. ([See Appendix 2](#))

9 ASSOCIATED TRUST PROCEDURAL DOCUMENTS

CORP/HSFS 1 - Health and Safety Policy Plus H&SRAF - Health and Safety Risk Assessment Form

CORP/RISK 30 - Risk Identification, Assessment and Management Policy Estates and Facilities Window Risk Assessment Portfolio

CORP/EMP 4 – Fair Treatment for All policy CORP/EMP 27 – Equality Analysis policy

10 DATA PROTECTION

Any personal data processing associated with this policy will be carried out under 'Current data protection legislation' as in the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR) 2021.

For further information on data processing carried out by the trust, please refer to our Privacy Notices and other information which you can find on the trust website:
<https://www.dbth.nhs.uk/about-us/our-publications/information-governance/>

11 REFERENCES

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<http://shop.bsigroup.com/ProductDetail/?pid=000000000030194015>

BS 6262-4:2005. Glazing for buildings —Part 4: Code of practice for safety related to human impact.

BS 6375-1:2015. Performance of windows and doors Part 1: Classification for weather tightness and guidance on selection and specification.

BS 8213-1:2004. Windows, doors, and roof lights —Part 1: Design for safety in use and during cleaning of windows, including door-height windows and roof windows — Code of practice.

BS 6375-2:2009. Performance of windows and doors – Part 2: Classification for operation and strength characteristics and guidance on selection and specification.

BS 6375-3:2009+A1:2013. Performance of windows and doors Part 3: Classification for additional performance characteristics and guidance on selection and specification.

BS EN14351-1:2006+A1:2010. Windows and doors —Product standard, performance characteristics —Part 1: Windows and external pedestrian door sets without resistance to fire and/or smoke leakage characteristics.

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APPENDIX 1 – WINDOW CLEANING CHECKLIST

To Include Post Clean Window Restrictor Check

AREA	CLEANED	WINDOW LOCK CHECK	COMMENTS	NAME	SIGNATURE	DATE

ESTATES ADVISED – PASSED TO ESTATES -----

APPENDIX 2 - EQUALITY IMPACT ASSESSMENT PART 1 INITIAL SCREENING

Service/Function/Policy/Project/ Strategy	Division	Assessor (s)	New or Existing Service or Policy?	Date of Assessment
CORP/HSFS 28 v.3 - Window Management Policy	Estates and Facilities	Mr S Tyler	Existing Policy	10 Apr 2022
1) Who is responsible for this policy? Name of Division/Directorate: Estates and Facilities				
2) Describe the purpose of the service / function / policy / project/ strategy? Who is it intended to benefit? What are the intended outcomes? To ensure external windows and internal glazing perform safely, securely and for the comfort and benefit of service users. NHS Requirements: NHS 'No Never Event' 15. Falls from unrestricted windows. Health Building Note 00-10 Part D: Windows and associated hardware. Health and Safety at Work Act 1974, Management of Health and Safety at Work Regulations 1999, Construction (Design and Management) Regulations 2015				
3) Are there any associated objectives? Legislation, targets national expectation, standards: Trust Wide Staff . Specific objectives to fulfil the NHS Requirements: NHS 'No Never Event' 15. Falls from unrestricted windows. Health Building Note 00-10 Part D: Windows and associated hardware				
4) What factors contribute or detract from achieving intended outcomes? – N/A				
5) Does the policy have an impact in terms of age, race, disability, gender, gender reassignment, sexual orientation, marriage/civil partnership, maternity/pregnancy and religion/belief? No				
<ul style="list-style-type: none"> If yes, please describe current or planned activities to address the impact [e.g. Monitoring, consultation] – N/A 				
6) Is there any scope for new measures which would promote equality? [any actions to be taken] N/A				
7) Are any of the following groups adversely affected by the policy?				
Protected Characteristics	Affected?	Impact		
a) Age	No			
b) Disability	No			
c) Gender	No			
d) Gender Reassignment	No			
e) Marriage/Civil Partnership	No			
f) Maternity/Pregnancy	No			
g) Race	No			
h) Religion/Belief	No			
i) Sexual Orientation	No			
8) Provide the Equality Rating of the service / function / policy / project / strategy – tick (✓) outcome box				
Outcome 1 ✓	Outcome 2	Outcome 3	Outcome 4	
*If you have rated the policy as having an outcome of 2, 3 or 4, it is necessary to carry out a detailed assessment and complete a Detailed Equality Analysis form – see CORP/EMP 27.				
Date for next review: April 2022				
Checked by: Gary Hewit			Date: 10 Apr 2022	