

## OT-EI-SD-002 On Tower UK Ltd Site Access Standard

### 1. Purpose

The purpose of this document is to set out the On Tower UK strategy for controlling and managing access to its operational sites to ensure the safety of visitors.

As a site owner, On Tower UK recognizes its duty of care to all visitors to its sites whether they be employees, customers, contractors or others. It recognizes that work activities undertaken by the site visitors may potentially impact On Tower UK neighbours and the general public outside a site boundary. It also understands that in allowing visitors to access its sites there is a risk to On Tower UK and its customers', assets and operations.

The nature of On Tower UK business is the transmission of Radio Frequency (RF) signals and providing site share facilities including the use of masts towers and rooftops as a platform from which customers transmit RF signals. These operational activities are supported by equipment installation and removal, fault response and maintenance activities which are undertaken by or on behalf of On Tower UK and its customers.

These activities may present a number of hazards to individuals accessing On Tower UK sites and to the wider public outside its site boundaries. On Tower UK recognises that as the owner of these premises it holds the primary responsibility for putting in place controls to ensure that the risks to staff visiting site, other site visitors and the public are minimized.

### 2. Scope

This policy applies to all On Tower UK employees, customers, contractors and all other persons undertaking visits to On Tower UK owned and managed sites.

### 3. Overview

The following Statement is intended as a high-level summary outlining On Tower UK position for this standard:

Aims:

- To ensure the safety of all persons accessing On Tower UK operational sites
- Providing a structured system of control for access to minimise the risk of injury to persons by limiting access to those who are competent
- Providing a process by which all visitors to On Tower UK sites can be advised of all known permanent and temporary hazards present on site
- To set out the processes to be followed which will ensure that all competent and

- legitimate visitors to On Tower UK sites can obtain safe access with minimal delay
- To provide a single point of reference for all persons wishing to access On Tower UK sites

On Tower UK is committed to ensuring that risks: to its neighbours and the wider public; to both On Tower UK employees and its customers; to assets and operations, are controlled as far as is reasonably practical. To meet our commitments, we will apply the following principles:

- Take all realistic steps to meet reasonable access requests in line with contractual Service Levels
- Protect our environment through the employment of considerate working methods
- Set clear standards and measuring subsequent compliance
- Work closely with site providers to maintain a productive and harmonious relationship
- Assess visitor competence and provide accreditation to ensure they can safely complete the tasks they have been set
- Provide attendance at sites with significant hazards which cannot be reasonably mitigated by other means
- Deconflict site activities to ensure a safe working environment
- Document residual hazards and make available via the Access Request Portal
- Management of breaches to understand and take the actions necessary to prevent reoccurrence

On Tower UK actively promotes continual improvement by:

- Continuous review of its policies, processes, rules and procedures; identifying areas of potential improvement and putting in place changes to affect those improvements
- Actively seeking alternative, more effective and efficient methods by which it can reduce risk to site visitors
- Implementing periodic audits that ensure breaches of access arrangements are identified, subsequently investigated and where necessary, further steps taken to ensure compliance in the future

#### **4. Access Standards - Summary**

- All site visitors must be pre-accredited through the On Tower UK Accreditation process
- On Tower UK will make reasonable endeavours to provide timely access to site for its customers and their approved contractors.
- All visits to all On Tower UK sites must be supported by an approved access permit
- All access to site must be in accordance with the site access provisions for the site
- On Tower UK will manage the timely resolution of any site access issues which prevent an accredited company or persons with an approved access permit to access site

- Any works undertaken on site must be in accordance with the relevant Agreement
- All site visits are to be planned to take account of the published residual hazards for the site.
- All site visits for structures and rooftops are to be carried out in accordance with On Tower UK SHE rules and requirements
- All potentially overlapping site activities will be identified, and risks mitigated.
- On Tower UK will provide site attendance to oversee higher risk site visits or operations.
- All site visitors will ensure that the site environment and relationships with neighbours and local site providers are protected.
- All work undertaken on On Tower UK sites or Managed sites will be undertaken against On Tower UK SHE rules and requirements
- Any accidents, incidents or near misses at site must be reported to On Tower UK at the earliest opportunity
- All visits to On Tower UK to portfolio sites will be made aware of the site status and act strictly in accordance with the access rules that apply to those specific portfolios
- Non-compliance with the above will be dealt with using the process for the management of site access breaches

## 5. Accreditation Process

### 5.1. Overview

The Access Accreditation Process ensures as far as is reasonably practical that visitors to On Tower UK sites hold appropriate training and can demonstrate that they understand and can implement On Tower UK access requirements. Entry to On Tower UK sites is permitted by pre-accreditation of their company and all persons who require access to On Tower UK sites.

In order to achieve this, On Tower UK will require both companies and individuals to become accredited through the Access Accreditation Process prior to accessing an On Tower UK site. Different levels of assessment will be required dependent on the work types to be undertaken, for example, ground or structural based work and/or the site types to be visited. In addition, further accreditation such as security vetting will be needed if access is required to certain portfolio types, for example, MOD.

Access Accreditation Process:

The process is operated by a two-tier system:

- Companies
- Individuals

It is mandatory for all persons requiring access to a site to complete the online Site Access Induction Course to ensure that they are familiar with On Tower UK regulations for accessing site and the importance of having safe access to site.

Accreditation in both tiers will be valid for a period of two years and individual accreditation will only be possible for direct employees of accredited companies. Site activity is defined as one of six generic types:

Access Level	Description of activity
Structure work	Any activity which involves the climbing of a mast, tower, stub tower or climbable pole on a roof, a pylon or any similar structure
Rooftop work	Any activity which involves work on a roof
Rooftop- cabin	Any activity which involves working within a sharer’s cabin on a rooftop
Satellite Antenna Field	Access to or in close proximity to ground mounted satellite dishes
Ground – other	Any activity which involves working outside of a building without working at height. e.g. grass cutting, trenching, fence repairs, etc.
Ground – cabin	An activity which involves working inside the Site Sharer’s equipment building/cabin.

Each accredited company, and its employees, must be accredited to the appropriate level for the work they wish to carry out. All persons visiting site must be registered by the accredited company with the exception of any site activity which is categorized as “ground - cabin”.

On Tower UK recognises that there may be occasions where a company may be required to attend a site as a one-off visit only and therefore it is not practical to undergo the accreditation process.

Where a MEWP or scaffolding company is required to attend site, On Tower UK appreciates that these companies may be sourced locally or on an ad-hoc basis and therefore accreditation is not practical. A one-off permit request must be completed and the company instructing this activity must be sufficiently accredited, will be required to arrange the access and take ultimate responsibility for the company being used. RAMS must be supplied and Site Attendance that may be required under the site access provisions.

## 5.2. Accreditation Process for Companies

A company wishing to either apply to On Tower UK for or renew its accreditation to become an approved access company will need to fully complete the relevant application form, available on the On Tower UK website under the Code of Practice. A fee will be charged for this accreditation by On Tower UK and a purchase order must be supplied with the completed application form. Please refer to Appendix A for charges. On Tower UK will then review and

assess the information provided, along with any history of activity where a previously accredited access company is applying for re-accreditation.

Following successful assessment by On Tower UK, a two-year accreditation to the company shall be granted. At this point On Tower UK will request details of persons who require an Access Request Portal login. This will allow the company to submit requests for access through the Access Request Portal. Logins are issued per individual and are not permitted to be shared – each login expires after 3 months and will need to be renewed. Accounts will be deleted following a period of 6 months inactivity. Any breaches in the use of logins shall result in their termination.

### **5.3. Merger/Amalgamation of Companies or Transfer to Employees from Two Accredited Companies**

In the event of companies merging or employees being transferred from one accredited company to another, On Tower UK shall require written confirmation from both companies, detailing the required transfers and effective date. Any access requests and Post Work Reports must be completed in the Access Request Portal prior to completing the transfer. The individual accreditation fees are not transferable and a new PO for the accreditation fee would need to be supplied from the new company. On Tower UK does not accept third party purchase order numbers.

### **5.4. Accreditation Process for Individuals**

All individuals who require access to site for anything above Ground-Cabin level access must be accredited. The engineer application form must be completed and returned with the supporting information requested and a valid purchase order number. Please note that access rooftops, satellite dishes or structures for engineers under between the age of 18 and 21 will be subject to additional approval, engineers between the age of 16-17 are not permitted to access rooftops, satellite dishes or structures. Once accredited, all registered individuals will be required to complete the Site Access Induction course. The accreditation for accredited access individuals will be valid for two years.

If a mandatory certificate of competence expires within the two-year accreditation period, in order to ensure accreditation continues, evidence of re-certification must be supplied to On Tower UK. Please refer to the On Tower UK website under the code of practice for a list of accepted training providers. As a prompt, the Access Request Portal will issue an automatic notification to the accredited access company to warn of the imminent expiry of an individual's certificate. For certain site activities for example; abseiling, additional evidence of competency must be supplied to On Tower UK

An individual may only be accredited to one company at any one time.

Please contact the Accreditation team for relevant application forms.

## **6. Access Standards – Detailed**

### **6.1. Use of Temporary Resource/Agency Employees**

On Tower UK recognises the requirement for temporary resource to be used from time to time. On Tower UK will permit an accredited company to use temporary employees providing the below conditions are satisfied:

- The accredited company assumes responsibility for the induction of the individual and ensuring they work in accordance with their companies' policies and procedures,
- The accredited company provides all relevant PPE such as RF monitors.

Where an accredited company requires the use of temporary resource for works greater than Ground-Cabin, individuals must become accredited and will be subject to the standard accreditation fee.

Should an accredited company wish to use the resource of another accredited company or agency in conjunction with their own access request, then this must be stipulated in both parties' access requests. The company supplying the temporary resource must include the Access Request ID of the accredited company to which they are supplying the resource.

There is a possible exception to this. On managed site portfolios there may be circumstances in which employees of the portfolio owner require access into the On Tower UK managed demise. This eventuality will be managed on a case-by-case basis. The granting of access for non-accredited persons will be approved on a case-by-case basis by On Tower UK.

### **6.2. Providing Timely Access**

On Tower UK access process is designed to ensure that an access authorization can be issued to a customer with minimal delay. The access requests portal differentiates between fault response and more routine visits, On Tower UK ensures that priority is given to the processing of fault response access requests. All requests for access must be made via the Access Request Portal by the accredited company requesting the access.

All access requests will be approved according to the access provisions detailed in the site lease agreement and access portal, all access requests must be submitted in accordance with these provisions. It should be recognized that sites have varying access restrictions e.g. site opening hours, safety restrictions, site attendance requirements, notice period requirements, and that approving access for these sites may take longer due to adherence to these access provisions.

Any block bookings with the exception of Principle Contractor should not exceed 5 days unless a valid reason is provided.

This policy recognizes that at times access to some sites may be restricted for long periods due to major re-engineering works being undertaken. During these construction periods the access

control of some sites may be handed over to delivery partners. On Tower UK will take all reasonable steps to negotiate access particularly for customers with services affecting faults during the restricted period. If not successful and the Requester believes that access is being unreasonably denied, then the matter can be escalated following the escalation process set out in Appendix B.

On Tower UK operates a Site Access team responsible for processing access requests through the Access Request Portal, during working hours site access requests are reviewed regularly. Any requests for site access submitted outside of Monday to Friday 09:00 – 17:00 for urgent access must be called through to the Site Access team as per Appendix B.

### **6.3. Site Access Permits**

Access to site is not authorised without a valid approved access permit in the name of the persons and company undertaking the works on site, this must be available on site by the person accessing site as either a hard or soft copy.

Access to an On Tower UK site without a valid approved access permit will be deemed as unauthorised access and a breach of this Policy. On Tower UK will investigate any instances of unauthorised access, if an accredited company is found to be taking access without a valid approved access permit then On Tower UK will take action, which may include revoking accreditation.

Access to site is permitted solely for the purpose detailed in the job description details on the approved access permit, no other works should be undertaken on site. Any works undertaken on site not detailed in the approved access permit will be deemed as a breach of the access permit and will be investigated by On Tower UK and action taken in line with the Site Access breach process.

### **6.4. Site Access Provisions**

Site access must only be taken in accordance with the access provisions detailed on the access permit, following the designated access route, all visitors are expected to take a common-sense approach to changing conditions at site e.g. weather, seasonal crops or moving of livestock, visitors should use the Post Works report to provide feedback.

On Tower UK will investigate any instances of access taken at site outside of the access provisions detailed on the approved access permit, if an accredited company is found to be taking access to sites without following the access provisions set out on the approved access permit then accreditation can be revoked.

Access keys or cards provided from an authorised On Tower UK source must be kept safe and secure at all times and returned within the relevant requested time scales. Keys and access cards must only be used by the person to whom they have been issued. Where non-On Tower UK locks are fitted, it is the responsibility of the visitors on site to ensure that they do not impede other

users, and that where required, padlocks are fitted in a way to allow all locks to be opened. Fences, anti-climbs and gates must not be climbed-over or removed under any circumstances. Site keys can be requested via the Accreditation team, notice periods are required to allow for keys to be sent prior to the site access.

OBASS cards must be used in accordance with BT's terms and conditions, including only being used by the person to whom the card is registered, also ensuring the PIN number is kept confidential.

On Tower UK operates CCTV on some sites, the approved access permit will detail the process upon entering site and advising the CCTV operator that persons are entering site with an approved access permit.

#### **6.5. Site Access Issue Resolution**

On Tower UK will endeavour to work with the site provider, landlord, portfolio owner and/or agent to resolve site access issues preventing an accredited company or persons carrying out works in accordance with an approved access permit.

#### **6.6. Site Share Agreements**

On Tower UK will provide authorisation to access site in accordance with the access provisions on site. Prior to accessing a site, it is the responsibility of the site sharer to ensure that On Tower UK has confirmed any relevant third-party consents have been obtained and the sharer will ensure it has the necessary rights and/or consent from On Tower UK under the relevant Site Share Agreement before carrying out any works on site. An approved access permit does not provide confirmation that the proposed works are permitted under the relevant Site Share Agreement.

For project works the On Tower UK Project Team undertaking the works will ensure that consent has been granted by the Site Provider to undertake the works.

Anyone accessing a site shall not carry out any unauthorised works or otherwise tamper with or cause any damage to any Site or Mast or Other Sharer's equipment:

- physically disrupt, interrupt or interfere with the emissions of any other sharer.
- permit any act at any Site which causes or is reasonably likely to cause any nuisance, annoyance, disruption, loss or damage to the On Tower UK, Other Sharers and any Landowner or Owner or Occupier of any property adjoining or nearby

#### **6.7. Published Residual Site Hazards**

On Tower UK will collate information relating to residual hazards that exist on its sites, these will be listed in the approved access permit. On Tower UK encourages all site visitors whilst on site to note and pass back to On Tower UK any additional residual hazards that they encounter whilst on site. All urgent hazards should be escalated following Appendix B, all non-urgent hazards this



should be reported by completing a post works report. The On Tower UK Access Request Portal is the central repository of residual hazards will be updated as new information is provided.

All visitors to On Tower UK sites are required to ensure that the Residual Hazard information provided with the approved access permit is used in the detailed planning of the work to be undertaken on site.

For site access requiring site attendance the representative will hold a site safety meeting before the work starts, this will record the condition of the site and all relevant safety matters that have been discussed and agreed.

Method Statements (RAMs) and Risk Assessments may be requested as part of the access request process if required by the site access provisions or if a special activity is due to be undertaken on site.

Special activities include:

- lifting and lowering of dishes which have a diameter of 1.2 metres or more;
- use of derricks;
- use of a crane;
- use of a helicopter for installation activities;
- use of an erection and man riding winch;
- use of a capstan winch for lifting and lowering Equipment at a height of 100 metres or more;
- excavations at the [Key Broadcast Sites];
- hot works on structures;
- installation of generators (whether temporary or permanent);
- removal of a structural member;
- electrical works which impact distribution boards or circuits owned by the Site Provider; and
- installation of scaffolding at a Site

If applicable a purchase order will also be requested to cover any Site Attendance fees. The release of the approved access permit may become delayed if the Risk Assessment and Method Statement (RAMs) are incomplete/unsatisfactory or not submitted in a timely manner. In addition, On Tower UK may supply these documents to a Site Provider or Landlord may require these documents. These documents must be made available on site by the accredited access company/persons for a site inspection by the site attendance.

## **6.8. Structures and Rooftops Visits**

All site visits for structures and rooftops are to be carried out in accordance with On Tower UK SHE rules and regulations. For further information refer to the On Tower UK website under Code of Practice.

### **6.9. Identifying and Mitigating Overlapping Site Activity Risks**

Often, due to the nature of the work carried out with respect to installation, maintenance and fault response, the coincidence of activities being undertaken by different parties at the same site may present significant hazards. It may not be practical for On Tower UK to permit more than one party to undertake work at a site, simultaneously. On Tower UK will review overlapping access requests and attempt to deconflict, if the activity is low risk On Tower UK may allow multiple activities to be undertaken at the same time on the same site by different accredited access companies ensuring all parties are be informed in advance. Where one or more of the activities are higher risk, it may be possible for the overlapping activities to proceed, as long as all parties on site work together to mitigate risks and ensure works are delivered safely. The first company on site is deemed as responsible for coordinating and cooperating with subsequent parties

Overlapping activities are often required due to access requests for urgent fault works, On Tower UK will to the best of its abilities coordinate the access requests to ensure that higher priority works are able to go ahead as requested through the Access Request Portal.

On Tower UK will provide an online site diary for each site, visible to all accredited companies when requesting site access through the Access Request Portal.

If persons are encountered on site unexpectedly then the escalation process as detailed in Appendix B must be enacted immediately.

### **6.10. Site Attendance - Higher Risk Site Visits or Operations**

The majority of access to On Tower UK sites can go ahead without requiring site attendance, however On Tower UK requires site attendance if the planned site works present significant risk or if the site access provisions require.

To manage an elevated level of risk access will be provided in the form of site attendance by a competent person, this ensures that On Tower UK mitigates the risk to persons on site during the access period.

On Tower UK may require site attendance for the following activities:

- Managed portfolios
- High levels of RF present (red structures) and/or sites where antenna shut downs or reduced power is required
- MF sites
- Power lifting:
- Use of cranes
- Use of MEWPs
- Lifting large items (including dishes of 1.8m or greater)
- Use of winches

- Site activities requiring man riding
- Lifting by Derrick or Helicopter
- Self-installation of Antennas, Feeders and Ancillary Equipment
- Unaccredited companies
- Priority broadcast transmitters and the link sites which feed them
- Other hazards or abnormalities
- Community relations issues
- Site type and site provider requirements
- Site security
- Excavation on all MF and Platinum classified sites, or where deemed necessary by On Tower UK
- Hot works
- Structure painting

In addition, site attendance can be requested via the access request process for reasons such as not holding keys or security clearance.

Site attendance shall be charged to the accredited company requesting access and a valid purchase order number must be supplied in order for the site attendance to be booked, site attendance charges are listed in Appendix A. The method of invoicing will be agreed between On Tower UK and the accredited access company through the accreditation process.

An approved access permit requiring site attendance can be cancelled without incurring a charge, provided that one clear working days' notice is given between cancellation and commencement of the access. If the approved access permit is cancelled due to inclement weather or other safety concern outside of On Tower UK control, any site attendance fees will be charged in full.

#### **6.11. Environment, Neighbours and Local Site Providers**

On Tower UK is fully committed to maintaining good relations with its site portfolio owners, site owners, landlords and neighbours. In order to ensure continued good relations, all visitors are required to plan their visit, ensuring that it can be undertaken without causing unreasonable disturbance, damage or nuisance caused, including but not limited to:

- Straying from prescribed access routes, blocking access, speeding or driving discourteously.
- Physical damage or defecation to land either on the permitted access route or not.
- Littering, failing to remove materials, cable drums and packaging.
- Shouting and the use of offensive language.

All persons accessing a site must be sensitive at all times to local circumstances and the local environment and community. If visitors to a site are approached by neighbouring residents with

complaints, then dependent on the circumstances, they are to invoke the escalation process as detailed in Appendix B or if non-urgent, complete the relevant section on the post work report page through the Access Request Portal. Sites must only be accessed for the purpose detailed in the Access Permit.

It is the responsibility of the persons attending site to ensure that no damage is caused to the site or neighbouring area. Any minor damage found on site must be reported via the Post Work Report in the Access Request Portal, and photographs supplied where possible. Major damage, such as missing gates/fences must be reported to Site Access as soon as possible and a Near Miss raised as necessary.

Should any damage occur whilst on site then Site Access must be notified immediately for further guidance it is the responsibility of the accredited company to rectify or reimburse the portfolio owner, site provider, landlord or neighbour for the damage. On Tower UK advise that in the event that damage is caused at site the persons on site take an accurate record of the damage, including pictures of the damage.

#### **6.12. Works at On Tower UK sites or Managed sites**

All works at On Tower UK or Managed sites shall be undertaken in-line with On Tower UK SHE rules and guidelines. For further information, refer to the On Tower UK website under the Code of Practice.

#### **6.13. Accidents, Incidents and Near Misses**

Any accidents or serious incidents on site must be reported to Site Access at the earliest opportunity. All work must stop until On Tower UK have made any necessary enquiries and are satisfied that it is safe for the work to continue. Any accidents, incidents or near misses must be reported to the contact number in Appendix B.

Should any environmental hazards be found or suspected on site, then work must cease immediately and if requested by On Tower UK, the site vacated. A Near Miss must be raised following the process set out as above and Site Access must be informed immediately to ensure that any further access can be restricted until the issue has been investigated and resolved.

Any damage to fencing, buildings, or the structure, any evidence of trespass or theft at site must be reported to On Tower UK as a Near Miss following the process set out above. All visitors must ensure that they do not facilitate access to the site for any other individual either intentionally or by accident, and that the site is kept secure during and upon completion of all works. If any part of the site cannot be locked and secured, the Site Access Team must be informed before leaving the site; visitors may be required to remain on site until the site is secured.

#### **6.14. Strategic Sites – Specific Portfolio Rules**

The On Tower UK site portfolio is large and varied. Large elements comprise sites owned by landlords with whom On Tower UK has valued strategic relationships. Often, the core operations undertaken by landlords are not broadcasting or communications. Those landlord operations present residual hazards to site visitors over and above those related to dedicated communications sites. On Tower UK has committed to work with those landlords to put in place safeguards and processes to ensure that access restrictions to those sites are minimised for mutual benefit.

As part of its undertakings with its strategic landlords, On Tower UK is responsible for providing an approved access request via the Access Request Portal to be used by or on behalf of On Tower UK or its customers.

On Tower UK will work with site providers through its Portfolio Management team to ensure that in each case it agrees a procedure with the landlord for the granting of individual site access authorizations. This will also include details of the competences required by both individuals and companies requiring access and the definition of documentation to be presented to the landlord for approval, prior to the access commencing.

#### **7. Measures**

The effectiveness of and compliance with the Site Access Standard will be continuously assured and measured through the following activities:

- Access Breach Management
- Investigation of near misses
- Trend analysis of site access data

## Appendix A Site Access Rate Card

Please note that all purchase order numbers supplied must be that of the accredited company. On Tower UK do not accept third party purchase order numbers.

### Accreditation Fees

Category	Fee £	Renewal Period
Individual	250	24 months
Company	1,000	24 months

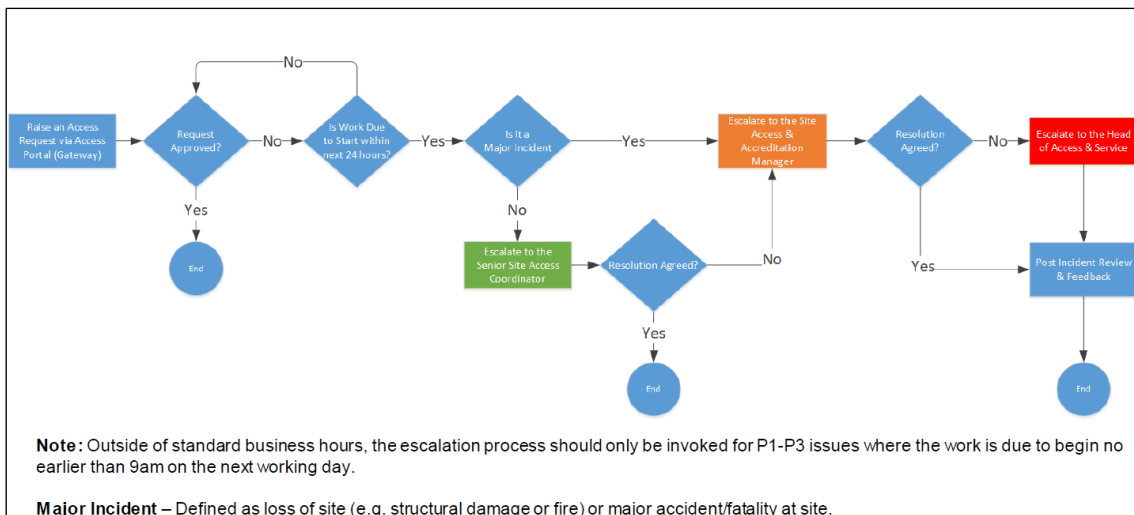
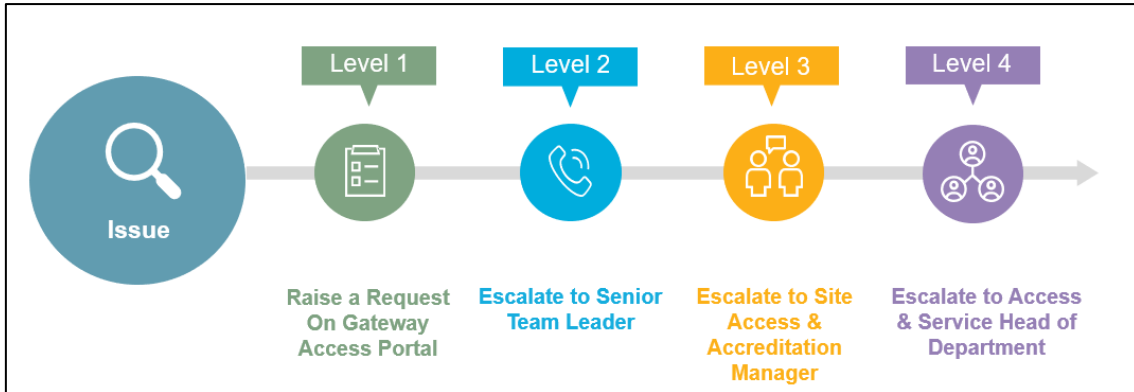
### Site Access Site Attendance Fees

Site Attendance will be provided in exceptional circumstances to manage site specific H&S risks, due to the nature of the work being undertaken, or to meet some site provider requirements.

Where an access request is cancelled, any Site Attendance fee will be waived providing more than one full working days' notice has been provided.

Category	Fee £	Period
More than 5 working days' notice	400	Per day
Less than 5 working days' notice	600	Per day

**Appendix B Access Escalation Process**



**Site Access Team Contact Details**

Telephone: 03330 150144  
Email: access@cellnextelecom.co.uk

**Site Access Team Leaders Contact Details**

Dave Hayes  
Telephone: 07812 460443  
Email: dave.hayes@cellnextelecom.co.uk

**Site Access & Accreditation Manager Contact Details**

Leanne Beswick

Telephone: 07811 652509

Email: leanne.beswick@cellnextelecom.co.uk

**Head of Access & Service**

Alex Barnes

Telephone: 07968 307367

Email: alex.barnes@cellnextelecom.co.uk

**Head of Estates & Infrastructure**

Mark Bartlett

Telephone: 07976 609533

Email: mark.bartlett@cellnextelecom.co.uk

**Accreditation Team**

Telephone: 03330 150145

Email: accreditation@cellnextelecom.co.uk

Email: Security.Vetting@cellnextelecom.co.uk

**IT Service Desk (for problems logging into Access Request Portal)**

Telephone: 08001 830048

**Incident Reporting Line (for accidents, incidents and near misses)**

Telephone: 03330 150272