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SPECIALISTS IN SECURE SHREDDING
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HEALTH AND SAFETY POLICY

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HEALTH AND SAFETY POLICY

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Rev 2	Legislation update	04/04/2014
Rev 3	Policy Review Amendments to the RIDDOR section and Employment Medical Advisory address update	20/11/2014
Rev 4	Section 3.19 - Vehicle Safety Changes to Driver License Checks	09/10/2015
Rev 5	Annual Review	03/08/2016
Rev 6	PAT testing changed to every 3 years	23/09/2016
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Rev 8	Annual Review – Update Organisation chart	05/10/2018
Rev 9	Mental Health First Aid Policy Update to Organisation Structure and Responsibilities Added Duty to Manage under Section 28 - Asbestos	09/10/2019
Rev 10	Annual Review & COVID -19 Section	14/12/2020
Rev 11	Annual Review	14/12/2021
Rev 12	Annual Review – Removal of COVID-1 Section as this is no longer a government requirement.	24/01/2023
Rev 13	Annual Review Update to Fire Regulations under Section 3.6 and Family Tree	08/01/2024
Rev 14	Amendment to Section 3.7 – First Aid Arrangements	08/02/2024
Rev 15	Annual Review Update to Family Tree	08/01/2025
Rev 16	Annual Review	11/12/2025

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HEALTH AND SAFETY POLICY

GENERAL

1.1 Policy Statement

The Company Health and Safety Policy is based on an absolute conviction that all types of accidents and ill health can be prevented. Accidents not only cause injury to people, leading to personal suffering, but they also cause damage to plant, property and product.

The Company will take reasonable measures to ensure that we conduct our business in a safe manner. Our aim is to implement a health and safety management system, which is based on achieving compliance with our legal requirements as a minimum.

The management of health and safety is a fundamental part of our business and our systems are designed to contribute in improving business performance. All employees must ensure that all aspects of our business are managed in a safe manner and must take practical measures to ensure that our activities do not harm our employees, customers, contractors and members of the public.

In order to achieve good health and safety performance, adequate resources will be provided to implement this policy and associated improvement programmes. The Company will ensure that safe and healthy working conditions are provided and maintained in an efficient order. Risk assessments will be undertaken for all of our hazardous operations and safe systems of work; safe plant and equipment; instruction and training will be provided in order for our employees to work safely.

The Company also recognises our responsibility towards the environment and will ensure that our activities are carried out without detriment to the environment.

Directors and Managers must be conversant with the contents of this policy and must plan, regularly review and develop this policy. All employees are required to comply with this policy and must understand their specific responsibilities. These are outlined in the organisation responsibilities and arrangements sections and include co-operating with the Company on safety matters and taking care of their own health and safety and the safety of others affected by their work activities.

Every employee has the right to raise health and safety concerns with a Manager. Effective two way communication and consultation of health and safety is essential and will be achieved by health and safety being a set agenda item at meetings and during employee consultations.

The policy will be brought to the attention of all employees through induction training and a copy will be displayed on the health and safety notice board at our site. Furthermore each employee will be provided with a copy of the policy.

This policy will be reviewed annually or more frequently as necessary in the light of legislation requirements or significant changes to the way we operate our business.

Signed

Managing Director

Date: 11th December 2025

1.2 Objective of the Health and Safety Policy

The objective of this Policy is to establish a health and safety management system which provides the effective planning, organisation, control, monitoring and review of preventative and protective measures in order to comply with legislation and minimise risks to health and safety. We also aim to comply with the principles of ISO 45001:2018 and are committed to implement, maintain and continually improve our health and safety management system.

This will be achieved by the following:-

Planning

Adequate planning will ensure that the health and safety policy is fully implemented using a systematic approach for identifying priorities and setting health and safety objectives to eliminate hazards and reduce risks.

This will include a programme, with deadlines for the completion of risk assessments, safe systems of work and the implementation of control measures. Wherever reasonably practicable, risks should be eliminated through selection and design of facilities, equipment and processes.

Organisation

The organisational structure identifies individual health and safety responsibilities for implementing health and safety. Training will be provided in order for individuals to carry out their responsibilities. We recognise that a competent workforce is a safe workforce and the competence of our employees will be under continual assessment.

The Depot Manager will provide the overall co-ordination and implementation of the health and safety management system. Our appointed external Health and Safety Consultant (Ranmoor Health and Safety Ltd) will assist with all aspects of implementing the health and safety management system.

Health and safety will be an agenda item at meetings and an effective means of communication and consultation will be established so that employees are provided with adequate health and safety information.

Adequate resources will be provided so that those with responsibilities are able to discharge them effectively. Standards will be set by measuring the performance of those with responsibilities to ensure that they are met.

Control

The control of risk will be determined by the identification and assessment of hazards and implementation of suitable control measures. Every effort must be made to control risks by the implementation of a hierarchy of controls which include:-

1. Elimination of hazards (where reasonably practicable);
2. Reducing hazards and the potential to cause harm;
3. Preventing contact;
4. Safe systems of work; and
5. The use of personal protective equipment.

Risk control measures, which control the risk at source, are preferred; these provide protection for larger numbers of people and are less reliant on people doing something, e.g. control measures as above (1, 2 and 3).

Managers, employees and safety representatives will be involved in carrying out risk assessments and the selection of suitable control measures.

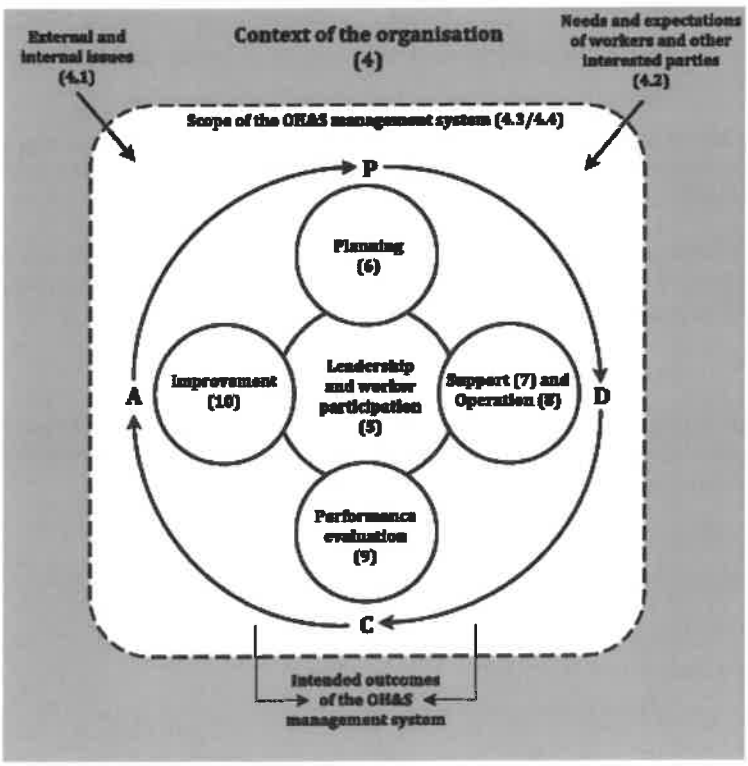
Safe systems of work will be implemented in order to provide employees with the significant findings of risk assessments. As part of the safe system of work all employees will receive information, instruction, training and supervision in order for them to work safely.

Review and Monitoring

In order to measure the implementation of the health and safety policy and its objectives, the safety management system will be monitored to assess how effectively the risks are being controlled.

Active and reactive monitoring systems will be fully utilised. Active monitoring is designed to provide feedback on health and safety performance before an accident, incident or ill health. It includes the monitoring of health and safety objectives; routine inspections of work areas; safety audits and safety observations. Reactive systems are triggered after the event and include; injuries and cases of ill health; losses such as damage to property or equipment; incidents with the potential to cause injury, ill health or loss; hazards; weakness or omissions in the safety management system. The results of monitoring will be fed back into the safety management system in order to ensure continual improvement.

Ranmoor Health and Safety Ltd will assist by carrying out an external audit of the management system so that we have an independent assessment of our health and safety performance.



2. ORGANISATION (RESPONSIBILITIES & ACCOUNTABILITY)

2.1 General

The Managing Director is ultimately responsible for the application of health and safety legislation and for achieving the objectives of the Health and Safety Policy. It is the aim of the Company to create a positive health and safety culture with an effective framework for the full involvement of all employees.

This responsibility is accepted and adequate resources will be provided with key people nominated with responsibilities and accountabilities identified to ensure that business functions are managed safely. Responsibilities and accountabilities are defined on the following pages in order to ensure that all employees fully understand their own contribution in creating and maintaining a safe working environment.

All employees, regardless of position, are reminded of the legal obligation placed upon them, which includes a duty of care to all other people. This liability cannot be passed on to anyone else. There is also a responsibility to observe and comply with sites rules; procedures; safe systems of work; safety equipment and personal protective equipment.

2.2 All Employees

All employees are held accountable at law, not to commit acts in breach of legislation and must not wilfully, and without reasonable cause, do anything likely to endanger themselves or others.

The Company undertakes to provide full instruction, training, supervision and information to enable all employees to fulfil their duties expressed in this section.

All employees must:-

a) Demonstrate their commitment to health and safety through their own attitude and behaviour and promote health and safety in the way they carry out work activities.

b) Co-operate with the Company in the implementation of all aspects of health and safety.

c) Conform to rules, procedures and instructions regarding safe working in any workplace or on any job.

d) Report to a Director, Manager or Supervisor unsafe plant, tools and equipment, unsafe practices or methods of work and any other hazards.

e) Use correct methods of work, as per the relevant safe working procedure and not improvise by using methods, tools or equipment, which entail unnecessary risks.

f) Assist in the maintenance of good housekeeping standards.

g) Report any accident or near miss incident to a Manager immediately.

h) Assist in the investigation of accidents and incidents.

i) Wear and use the necessary protective clothing and equipment specified in risk assessments, safety method statements and site rules.

2.3 Managing Director

The Managing Director is ultimately responsible for achieving the objectives of the Health and Safety Policy within the Company. He must: -

a) Take responsibility for, lead and promote the Safety Culture within the Company.

b) Ensure that Directors and Managers know and accept their responsibility for the Health and Safety Policy and the requirements for the implementation of the policy.

c) Provide adequate resources in order to fully implement the objectives of the policy.

d) Monitor the effectiveness of the policy by reviewing safety performance at health and safety meetings.

e) Fully investigate any health and safety implications when investing in new plant, processes, products and services.

f) Make health and safety targets and actions an agenda item at meetings.

g) Set health and safety objectives for Directors and Managers and review their performance against these objectives.

h) Take practical measures to ensure that business decisions do not harm our employees, contractors, customers and members of the public.

i) Obtain specialist advice when required.

2.4 Directors

Directors are responsible for ensuring that the organisation and arrangements for carrying out the policy are adhered to; as part of the Senior Management team they will: -

a) Lead by example and promote health and safety.

b) Operate within all legal and Company requirements applicable to the work in their area of control.

c) Provide adequate resources in order to fully implement the IMS and its objectives.

d) Ensure that Staff know and accept their responsibility for the IMS and the implementation of the policy.

e) Monitor the effectiveness of the IMS via Management Review.

f) Fully investigate any health, safety, environmental implications when investing in new plant, processes, products and services.

g) Set health, safety and environmental objectives for Staff and review their performance against these objectives.

h) Take practical measures to ensure that business decisions do not harm our employees, contractors, customers and members of the public.

2.5 Managers

Managers are responsible for ensuring that the organisation and arrangements for carrying out the policy are adhered to; as part of the management team they will: -

i) Lead by example and promote health, safety and environmental standards.

j) Ensure that hazards and risks are identified, assessed and controlled within their work area through the completion of risk assessments and safe systems of work.

k) Operate within all legal and Company requirements applicable to the work in their area of control.

l) Ensure that Staff know and accept their responsibility for the IMS and the implementation of the policy.

m) Monitor the effectiveness of the IMS via Management Review.

n) Clearly define safe operating procedures and ensure that they are known and observed by employees through the provision of suitable information, instruction, training and supervision.

o) Ensure that safety receives full consideration in:-

1. current work activities;
2. planning of new operations and methods of work;
3. designing new plant and equipment; and
4. emergency preparedness and response.

e) Ensure that employees are properly trained and, in particular that they receive adequate induction training, job specific training and supervision.

f) Take reasonable steps to ensure adequate control of contractors, their employees and sub-contractors, whilst at work on our site.

g) Take reasonable steps to ensure that all plant and equipment for use at work is adequately maintained, checked on a daily basis and tested to ensure its safety.

h) Ensure that all incidents accident / near miss / emergency situations incident reporting and investigation procedures are carried out. Examine all accident reports and implement any remedial action and monitor accident statistics.

i) Carry out workplace monitoring and inspections and use the findings to improve health, safety and environmental standards.

j) Ensure that IMS records and documentation are completed, maintained and kept up to date, e.g. training records, workplace inspections, equipment checklists, maintenance and examination.

k) Seek consultation with and contribution from employees.

l) Work closely with the Ranmoor Health and Safety Ltd to ensure that the health and safety management system is fully implemented

2.6 Supervisors

Supervisors are responsible for maintaining health and safety in the absence of a Manager.

In the unique position to influence Company / employee relationships, they have the following important duties as well as the shared responsibilities as detailed above for Managers:

a) To understand and operate within all legal and Company requirements applicable to the work and ensure that these are adhered to in practice.

b) To take immediate action to stop any unsafe practice or procedure.

c) Ensure that all personnel have the skills to carry out the tasks required.

d) Ensure that all plant, tools and equipment are available and safe to use and that there is safe access to all places at work.

e) Ensure that all rules, safe working procedures and instructions are applied in practice, and report to Managers and the Health and Safety Co-ordinators the need for revision of such procedures and where further training needs are identified.

f) As part of the normal routine, maintain the highest standard of housekeeping.

g) Implement the accident / incident reporting and investigation procedures and conform to agreed Company practice.

h) In certain emergency or unforeseen circumstances where close supervision is required, in the absence of a Manager, they will take all possible steps to minimise health and safety risks.

i) Ensure that protective clothing and equipment is worn and used.

j) At all times set the example for all employees to follow.

k) Bring to the attention of a Manager, Health and Safety Co-ordinators or our Health and Safety Consultants any unsafe acts or conditions.

2.7 Health and Safety Co-ordinator

The Health and Safety Co-ordinators is responsible for ensuring that all aspects of health and safety are planned, implemented and monitored to ensure overall effectiveness. Together with our consultants Ranmoor Health and Safety Ltd, they will provide advice and assistance in order for the Company to comply with health and safety legislation. In general health and safety duties will include: -

a) Co-ordination of health and safety activities by: providing safety information, communicating safety issues, and assisting to identify safety priorities.

b) Advise Directors on health and safety requirements.

d) Work closely with Ranmoor Health and Safety Ltd to ensure that the health and safety management system is fully implemented.

e) Co-ordinate the completion and implementation of the risk assessment programme.

f) Carry out workplace inspections and internal audits, review findings and implement corrective actions in order to improve health and safety performance.

g) Carry out accident / near miss incident investigations and prepare accident statistics for review at health and safety committee meetings.

h) Carry out safety inductions for new starters.

i) Cause work to cease where unsafe conditions or unsafe work practices are identified until the situation is rectified.

j) Ensure that the activities of contractors are controlled and issue as appropriate site rules and procedures, permit to work and relevant information on the hazards and risks which contractors are exposed to.

k) Responsible for organising the health and safety notice board, ensure that up to date minutes of meetings and health and safety information is displayed.

l) Challenge unsafe behaviour of employees and generally promote safe methods of work.

2.8 Health and Safety Committee

a) A Joint committee is established for the purpose of communication and consideration of all aspects of the Company's Health and Safety Policy and the implementation thereof. Matters for consideration will include, but not be limited to:-

- Health and Safety Policy;
- IMS Objectives;
- Statutory Legislation and Codes of Practice;
- Training and Instruction;
- Accident / Incident Statistics;
- Safety inspections and audits of the health and safety management system;
- Effects of changes in working practices or equipment.

b) Membership of the committee will be drawn from nominated employees from different departments of the Company, and the committee will be chaired by the Health and Safety Co-ordinator. The committee will meet bi-monthly. Present membership of the committee is shown in Appendix 2.

2.9 Safety Responsibility (Family Tree) Appendix 1
Note: All employees Section 7 HASAW Act

It shall be the duty of every employee while at work: -

(a) To take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions at work.

(b) As regards to any duty or requirement imposed on the employer or any other person by or under any of the relevant statutory provisions, to co-operate with them so far as is necessary to enable that duty or requirement to be performed or complied with.

3. ARRANGEMENTS

3.1 Risk Assessments

a) In order to control hazard and risk in the workplace, the Company will comply with the provisions of the Management of Health and Safety at Work Regulations and other regulations where there is a requirement to carry out a risk assessment.

b) The general principles of a risk assessment are to ensure that all relevant hazards and risks are assessed with the appropriate control measure in order to eliminate or reduce the risk.

c) Risk assessments must be undertaken by a team, which should consist of a manager; safety representative and the employee(s) who are familiar with or who are carrying out the task. Using a team approach will make the risk assessment more effective and a consistent approach should be achieved.

d) A six step approach to risk assessments can be used which includes:-

1. **Identify** the work activity, including the location; people; plant and equipment in use.
2. **Identify** the hazard, e.g. substances; machinery; work processes; working environment and who might be harmed. Refer to Acts or Regulations relevant to the work activity or seek specialist advice.
3. **Assess** the risk from the hazards identified. Consider existing control measures, which are in place to control the risks, whether they are deliberate measures or by the circumstances in which they are found. The effectiveness of the risk controls will need to be taken into account in assessing any remaining risks, e.g. residual risks.
4. **Evaluate** the risk using the following risk evaluation:

   Low risk – Acceptable (minor injury requiring first aid treatment which is unlikely to occur), no further action required but ensure controls are maintained

   Medium risk – Tolerable (major injury requiring hospital treatment where there is a possibility it could occur), look to improve

   High risk – Unacceptable (major injury, death, asphyxiation, serious health condition which are highly likely to occur), take immediate action to prevent a loss.

   This will allow you to make a judgement on the level of risk and the action, which is required to eliminate or reduce the risk. Apply the likelihood of a hazardous event occurring with the consequence/severity of harm to establish the risk rating. For example if a trailing cable is the hazard, a person tripping on the cable is the hazardous event and the consequence/severity of harm could result in loss time and medical treatment.

   From this determine the action level which is required to control the risk; decide on what control measure, considering the hierarchy of risk controls: -

   - **Eliminate** – avoid a risk altogether, e.g. by not using a particular hazardous substance.
   - **Reduce the risk** – consider the design layout and method of work, e.g. by changing the way a process is carried out (using a mechanical lifting device as opposed to manual handling).
   - **Prevent contact** – control the risk at source, e.g. providing guards to the dangerous parts of machinery.

- **Safe systems of work** – agree and document safe working procedures by involving employees. Inform employees of the agreed safe method of work and carry out monitoring of safe systems of work.
- **Personal Protective Equipment** – although considered as a last resort the use of PPE may be critical in achieving risk control. The effectiveness of PPE is subject to the correct specification for the risk identified, correct use and maintenance.

5. **Record** the findings on Company standard risk assessment forms. The risk assessor must consider other reasonably foreseeable hazards, which are specific to the work activity or situation being assessed. A controlled copy of the risk assessments must be retained in the relevant health and safety file.
6. **Review** the risk assessment and where further controls are identified they must be monitored for completion. In addition risk assessments must be reviewed every 2 years or sooner following a new work instruction; accidents/incidents; changes in work processes or where they become no longer valid, e.g. changes in legislation.

e) The risk assessment will be communicated to all person(s) affected by the work activity, including employees, visitors and contractors. All affected personnel are required to read, understand and follow the control measures in order to safeguard themselves and others affected by the work activity. Risk assessment controls will also be documented in a safe working procedure. All affected employees will be required to sign a copy of the safe working procedure as acknowledgement that they have read and understand the risk assessment.

3.2 Emergency Procedures

a) In the event of an emergency situation where serious or imminent danger was to arise, e.g. a fire or explosion, all employees must ensure that they follow emergency procedures for which copies are displayed around the site.

b) Measures must be taken in order to minimise the severity of an incident, e.g. shutting down plant, isolating energy sources on equipment or closing fire doors.

c) Emergency procedures are documented and communicated to all affected employees. They include the details of when and how the procedures are to be activated so that employees can reach a place of safety in good time. All employees must ensure that they follow the procedure.

d) The company will also ensure that nominated employees are trained in the procedures necessary to bring an emergency event under control. Fire Wardens will be appointed and trained. Employees must understand their role and responsibilities for implementing actions. The appropriate preventive and protective measures must be in place to safeguard employees.

e) Following an emergency situation the affected area must be assessed to ensure that no serious danger remains. The Manager must liaise with the emergency services (where relevant) and be satisfied that the area is clear and safe to continue work activities.

3.3 Accidents and Near Miss Incidents

a) Accidents are undesirable and unwanted and can result from an unplanned event or a series of circumstances, which lead to an incident resulting in harm, injury or loss.

b) A near miss incident is a series of events which results in a situation where no harm or injury has occurred but could have other than chance. Often they are not reported which could be detrimental as immediate, underlying and root causes of the incident are not identified or corrective action taken to prevent the incident from reoccurring.

c) It is the Company's overall goal to ensure that all accidents and ill health is eliminated in order to benefit both the welfare and health of our employees and the Company.

d) The Health and Safety Co-ordinator must be notified of all accidents and near miss incidents at the earliest opportunity so that an investigation where necessary can be completed.

e) All accidents and near miss incidents must be reported and recorded in the Company accident/incident book, which is located in the office. Incidents must be recorded by a manager or the first aider; the injured or affected person is not permitted to make a record. The injured person must receive first aid treatment or medical attention as necessary. The details of the incident including any first aid treatment given must be recorded.

f) Where a major accident / incident occurs, e.g. a broken limb or collapse of machinery or a structure, the scene of the accident must not be disturbed nor evidence removed until a full investigation has been completed. A Director / Manager on site must be notified immediately of such incidents and where necessary the relevant enforcing authorities.

g) An accident investigation must be carried out for accidents and near miss incidents where a serious injury has occurred or where there was the potential for a serious injury or loss. The aim of the investigation is to learn when things go wrong and how to prevent similar incidents occurring. The investigation should focus on the immediate and underlying causes of the incident.

h) The investigation must be thorough and be completed as soon as practicable after the event, as conditions can change rapidly and people's memories and recollection can fade.

i) The Health and Safety Co-ordinator, Safety Representative, Technical employees and where possible the injured employee, must be involved in the accident investigation. As part of the investigation the team must: -

- Collect evidence; use photographs, sketches, measurements, equipment involved, substances, post event tests, checks and sampling.
- Interview the injured person and any witnesses to establish the causes of the incident (include those observing or involved before the incident e.g. inspection and maintenance employees).
- Review relevant health and safety documentation; safe working procedures, risk assessments, training records, workplace inspections, checks, tests and examinations.
- Consider all the evidence and findings draw conclusions and make recommendations in order to prevent a reoccurrence.

j) A good investigation will identify both the immediate and underlying causes of the incident. Immediate causes include the job being done and the people involved, whereas underlying causes are the management and organisational factors, which lead to the incident.

k) **RIDDOR** - In order for the Company to fulfil our obligations under The Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR), the local enforcement authority will be notified where applicable. It is the responsibility of the Health and Safety Co-ordinator / Representative to report RIDDOR's within the timescales set within these regulations.

l) Major accidents/illness (work related) involving 7 days' or more absence from work must be reported in writing to the HSE at Bootle using the online Form F2508 (Injuries or Dangerous Occurrences) or Form F2508A (Diseases arising from physical agents or physical demands of work) within 15 days of the incident occurring.

m) The incident can be reported online through the HSE Website www.hse.gov.uk/riddor/index.htm.

n) Postal reports can be made however the preferred method of notification is online via the website. Written notification can be made to:

RIDDOR Reports
Health and Safety Executive
Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS

o) If the work related accident has resulted in a fatality this can be telephone reported 24 hours a day on 0845 3009923.

p) The accident / incident book should be reviewed during health and safety review discussions in order to identify trends and take measures to reduce accidents / incidents.

3.4 Fire Prevention Procedures

a) A Fire Risk Assessment has been carried out for our premises in order to for the Company to fulfil our obligations under the requirements of the Regulatory Reform Fire Safety Order 2005.

b) Fire safety precautions comprising of a manual fire alarm, fire extinguishers, emergency lights and fire exit signs have been provided at our premises. In order to ensure that fire safety equipment is maintained in a safe and efficient working order, fire checks will be completed. Fire safety precautions, e.g. fire extinguishers; manual fire alarm and emergency light system are serviced and maintained by appointed contractors in order to ensure its effectiveness.

c) All testing, maintenance and repairs must be logged in a Fire Log Register, which is located in the main office.

d) All employees must receive fire safety training as part of health and safety induction training and during annual fire evacuation exercises. Fire wardens must be appointed for each operational area and trained in order for them to fully understand their roles and responsibilities.

e) During a fire evacuation exercise fire wardens are responsible for sweeping and checking the areas under their responsibility to ensure that the building is vacated by all personnel. Fire wardens will also make observations during evacuation exercises, which must be recorded in order to evaluate the overall effectiveness of fire safety procedures.

f) All employees are required to observe the positions of fire safety equipment available on site, including the means of raising the alarm, fire extinguishers, fire escape routes and fire assembly points. Employees must not interfere or recklessly damage fire safety equipment.

g) Fire action notices are displayed around our premises, which detail the action and responsibilities for safe evacuation during an emergency situation. On discovering a fire, operate the nearest manual call point, leave the building by the nearest fire exit, **DO NOT** stop to collect belongings and move quickly to the fire assembly point.

3.5 Safety Training

a) Health and safety training is provided for employees to ensure that the demands of the job do not exceed employee's ability to carry out the work without risk to themselves and others.

b) Health and safety induction training is provided for all new starters. Following induction training the new starter or employees transferring to different jobs will undergo job specific training, which will be carried out by a Manager.

c) All training must be recorded on standard Company training forms, which must be signed for by each employee; records must be kept for auditing purposes. A training record will be kept for each employee in order to record those tasks for which employees are competent to perform safely.

d) All safety training must include the relevant hazards and risks associated with risk assessments and the requirements of safe working procedures.

e) Directors, Managers and Supervisors must ensure that no employee is asked to do a job for which they have not received job specific safety training. Equally it is the responsibility of employees to not undertake a task for which they have not received training.

f) Directors, Managers and Supervisors must ensure that the competence of employees is assessed at a local level and on an ongoing basis by reviewing employee competence. Where necessary additional training, including refresher training must be arranged.

g) Safety training must take place before the implementation of new processes and equipment. Training will be provided on an ongoing basis through a series of safe working procedures, which focus on specific health and safety hazards and issues arising out of the operation of the Company. This will allow the Company to increase the awareness of employees on health and safety issues and provide refresher training and training appropriate to legislative changes.

3.6 Visitors and Contractors

a) All visitors attending our site must do so through the main office, where they will be signed in / out and given a copy of the site rules to read.

b) All visitors are required to comply with the site rules at all times including the wearing of personal protective equipment, safety instructions and signs posted around the site.

c) Where appropriate only contractors from the approved contractor list will be allowed to carry out work on behalf of the Company. Approval of a contractor will include an assessment of health and safety and be subject to the suitability of their safety arrangements.

d) Contractors are required to complete a Pre Qualification Questionnaire and will be subjected to ongoing assessments of their health and safety arrangements and performance. The Health and Safety Co-ordinator is responsible for collating and assessing, Pre Qualification Questionnaires and supporting documentation, e.g. contractors liability insurance; health and safety policy; risk assessments and safety method statements.

e) Contractors will be given a safety induction where they will be provided with safety information in relation to the hazards and risks and safety rules for the site. Contractors are required to work in a safe manner and must not carry out unsafe work activities, which place themselves and our employees at risk.

f) Where necessary contractors will work in accordance with permit to work systems, which is a requirement for high hazard activities, e.g. work at height; hot work; electricity and confined spaces. The Health and Safety Co-ordinators will issue the relevant permit to work and ensure that it is signed off on completion or elements of the work.

g) The activities of contractors must be monitored; Managers and Supervisors must take an active role in ensuring that the work being carried out is safe.

3.7 First Aid Arrangements

a) In order for the Company to comply with our duties under the Health and Safety (First Aid) Regulations 1981 a first aid box is provided in the office and warehouse. First aiders are appointed and trained and are responsible for administering first aid and ensuring that the contents of the first aid box are kept fully replenished.

b) As a general guide the first aid box must be stocked with the following as a minimum:

- a leaflet giving general guidance on first aid (for example, HSE's leaflet *Basic advice on first aid at work* 6);
- 20 individually wrapped sterile plasters (assorted sizes), appropriate to the type of work (hypoallergenic plasters can be provided, if necessary);
- two sterile eye pads;
- four individually wrapped triangular bandages, preferably sterile;
- six safety pins;
- two large sterile individually wrapped unmedicated wound dressings;
- six medium-sized individually wrapped unmedicated wound dressings;
- a pair of disposable gloves;
- a resuciade.

c) First aid provision is available for all employees, visitors and contractors; in the event of injury or if a person is taken ill at work it is important that they receive immediate help and an ambulance is called in serious cases.

d) A Defibrillator is provided on site, First aiders will be provided with training and instruction in conjunction with First Aid Training and refresher training.

e) First aid will be reviewed following any operational changes to ensure that provision remains appropriate.

f) All first aid treatments must be recorded in the accident book; including the details of the injury and the treatment given and the name of the first aider.

3.8 Hazardous Substances

a) The Company will comply with the provisions set out in the Control of Substances Hazardous to Health (COSHH) Regulations 2002. Our policy is to achieve the control of hazardous substances by using a hierarchy of controls which include: -

- Prevention of exposure through elimination or substitution;
- Minimising exposure through the use of mechanical controls;
- Provision and maintenance of PPE where appropriate; and
- Information, instruction, training and supervision of employees.

b) All hazardous substances purchased by the Company must be accompanied with the relevant Material Safety Data Sheet (MSDS) so that an assessment of the hazard and risks can be made to safeguard the health and safety of employees coming into contact with it.

c) A hazardous substance can enter the body by:-

- breathing in gases, fumes, mists, dusts or vapours;
- contact with the skin through absorption;
- swallowing;
- contact with the eyes; and
- skin puncture.

d) Hazardous substances can be identified by the labels below:

e) All hazardous products will be entered onto a hazardous substance list and a risk assessment will be completed. The Health and Safety Co-ordinator is responsible for maintaining and updating the list, therefore the purchase of hazardous substances must be co-ordinated.

f) Employees will be provided with safety information in relation to the correct use of substances and the preventative and protective measures, which are required to safeguard their health.

g) Employees must at all times follow safety information including the wearing of PPE; if in doubt seek advice from the Health and Safety Co-ordinator

h) Where employees are exposed to airborne contaminants, e.g. dusts, respiratory protection will be provided to prevent exposure.

i) Employees exposed to health risks will be provided with health surveillance in order to ensure that checks are completed for any early signs of work related ill health (see section 3.16).

3.9 Electricity

a) The Company will comply with the provisions set out in the Electricity at Work Regulations 1989 and The British Standard BS 7671 *Requirements for Electrical Installations* also known as the IET Wiring Regulations.

b) The Company will take reasonable practicable measures in order to prevent death or personal injury to any person(s) in conjunction with work activities involving electrical supplies, conductors, plant or equipment.

c) The hazards connected with the use of electricity could result in:-

- electric shock;
- electric burn;
- fires of electrical origin;
- electric arcing; or
- explosions initiated or caused by electricity.

d) All electrical work must be carried out by a competent electrician. Minor electrical repairs e.g. changing fuses, fitting light bulbs, can be carried out by nominated person(s), who have received electrical training. Electrical training must also include how to carry out electrical visual inspections.

e) All portable equipment must be checked and inspected; this will be achieved by a program of Portable Appliance Testing (PAT) every 3 years. PAT must be completed by a competent person; all electrical equipment must be individually numbered and placed on a register.

f) Employees are required to carry out pre user checks; any faulty or damaged equipment must be labelled, taken out of use and be either repaired or replaced.

g) All fixed electrical equipment must be adequately labelled, maintained and checked for electrical safety by a competent person. Fixed wiring electrical inspection and testing is carried out every 3 - 5 years.

h) It is the responsibility of employees to ensure that electrical equipment / tools are maintained in a safe condition, this must be facilitated by checks prior to their use. Any defects must be reported to a Manager immediately so that a replacement can be provided and the tool labelled and taken out of use until repaired.

i) Electrical work must only be carried out by competent persons.

3.10 Display Screen Equipment

a) The Company is committed to providing all employees with suitable working environments that are well maintained which do not affect their health and welfare. The main risks that may arise in work with DSE are musculoskeletal disorders such as back pain or upper limb disorders (sometimes known as repetitive strain injury or RSI), visual fatigue, and mental stress. While the risks to individual users are often low they can still be significant if good practice is not followed.

b) The requirements of the Display Screen Equipment Regulations 1992 are implemented to ensure the standards are effective and proactive in order to minimise the likelihood of habitual users suffering injury or discomfort. Furthermore the Company will provide employees with information and instructions on how to set up the workstation.

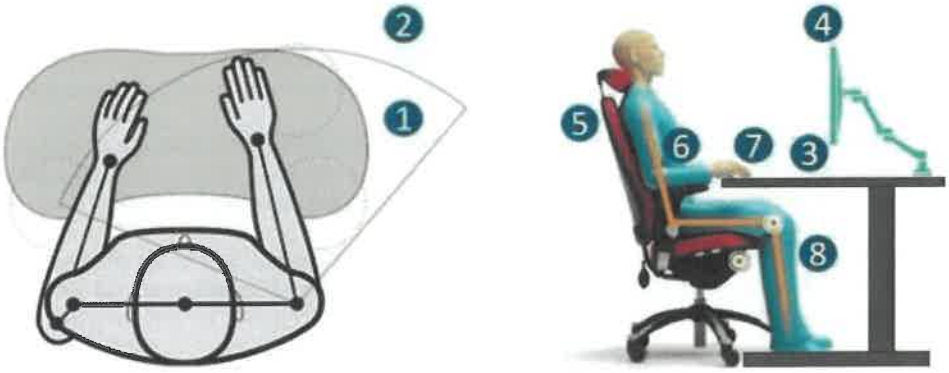
c) All workstations must be assessed. Employees using a visual display unit for a significant part of their working day are determined as a 'User' e.g. (an employee who habitually uses display screen equipment as a significant part of his normal work). Users are required to co-operate with the Company during the assessment, which will be conducted using a display screen equipment checklist.

d) The Company will address any reports of discomfort and provide the necessary adjustments and or equipment to reduce and control the risks.

e) The Company will ensure that the following requirements are implemented in order to ensure compliance with DSE regulations.

- Provide suitable ergonomic work equipment and ensure it is maintained.
- Provide suitable heating, lighting and ventilation.
- Provide all 'users' with suitable training on the software, equipment and DSE Policy.
- Ensure that regular observations of the workstations and users are conducted.
- Where the 'user' has discomfort, reasonable adjustments should be made to improve comfort for the individual.
- Make provisions for new or additional equipment, software and training.
- Ensure all users have appropriate breaks and off screen activities.
- Provide free eye tests for 'users' if requested for the purpose of display screen equipment and a contribution towards glasses if needed.
- Maintain all records relating to equipment, assessments and eye examinations.

All employees are responsible to ensure they adjust the work equipment to maintain a good ergonomic posture as below.



1. Neutral Reach Zone for commonly used items
2. Outer Reach Zone for items used infrequently or rarely
3. Place all the things you must easily see (display, source document, writing pad, template, keyboard)
    - directly in front of you at your best viewing/reading distance
4. Place the display
    - directly in front of you, at approximately arm's length from you and with a natural relaxed eye level at the top of the screen (an area approximately 15° below the horizontal plane)
5. Change your body posture often. Change helps avoid continued compression of tissues especially of the spinal column, facilitates blood circulation and counteracts muscle fatigue
6. Rest your arms and hands as often as feasible – but avoid hard surfaces, especially corners and edges
7. Keep the shoulders relaxed, the upper arms hanging down, the forearms horizontal and the wrists straight
8. Sit at a height where your hip is slightly higher than your knee joint - so that your pelvic angle is open more than 90 degrees. This is best achieved when sitting slightly reclined in your chair to take the weight backwards and prevent you from having to support your body in an upright posture.

3.11 Welfare Provision

a) The Company recognises our responsibilities for ensuring the health, safety and welfare of our employees as required under the Workplace (Health, Safety and Welfare) Regulations 1992. Our arrangements for welfare are designed to meet the requirements for all employees including those with disabilities.

b) Ventilation is provided in work areas through the opening of doors and windows.

c) The temperature of the workplace is regulated through the provision of cooling fans and heaters. A minimum working temperature of 16°C must be maintained in the office area Temperature gauges are provided in work areas in order to monitor temperatures.

d) Sufficient lighting must be provided throughout all working areas in order for employees to work and access the work area safely. Lights must be maintained, blown lamps must be changed by nominated competent persons.

e) Workstations and seating must be suitable and adequate space must be maintained in order for employees to move about with ease. A minimum of 11 cubic meters per person is provided in each work area, this must be maintained when storing equipment.

f) Suitable and sufficient sanitary conveniences and washing facilities are provided including separate toilets for male and female employees. Hot water, soap and towels are provided. Drinking water and facilities for preparing and heating food are provided.

g) Employees are required to keep all welfare facilities clean and in an efficient order, work surfaces, microwaves and fridges must be kept clean. The adequacy of welfare facilities will be monitored during workplace inspections.

h) Suitable floors and pedestrian routes are provided. Staff are responsible for monitoring good housekeeping practices.

3.12 Manual Handling Operations

a) The Company will comply with the provisions set out in the Manual Handling Operations Regulations 1992, as amended in 2002 in order to control manual handling activities which include the lifting, lowering, pulling, pushing or carrying.

b) The Company will consider the risks of manual handling to the health and safety of our employees. All manual handling activities must be planned and suitably controlled.

c) Managers are responsible for the implementation of manual handling assessments and must ensure that the following Hierarchy of Controls are implemented:

- Avoid the need for hazardous manual handling, so far as is reasonably practicable;
- Assess the risk of injury from any hazardous manual handling that can't be avoided; and
- Reduce the risk of injury from hazardous manual handling, so far as is reasonably practicable.

d) Employees also have a responsibility for ensuring their own health and safety and must:

- Follow appropriate systems of work laid down for their safety;
- Make proper use of equipment provided for their safety;
- Co-operate with their employer on health and safety matters;
- Inform the employer if they identify hazardous handling activities;
- Take care to ensure that their activities do not put others at risk.

e) The manual handling risk assessment process will consist of the following:

- Identify and list work tasks/activities involving manual handling actions.
- From the completed list, identify injury potential by reviewing workplace injury records, observing the workplace and consulting with employees.

- Complete a Manual Handling Risk Assessment for each work activity identified as having a risk potential.
- Implement the control actions and further actions required to reduce the risk.
- Monitor the effectiveness of risk controls including employee observations during manual handling activities.

f) The manual handling assessment must be conducted in order to consider the manual handling problem and the ways of reducing the risk of injury. A risk assessment template must be used to consider **T.I.L.E**:

- **T**ask – what is involved in the activity (physical demands during lifting, lowering, pushing pulling and carrying);
- **I**ndividual capabilities – does the job require unusual strength or issues for those with physical disabilities or health problems;
- **L**oad – is it bulky, heavy, difficult to grasp or does it pose an additional hazard e.g. sharp, hot or contain a hazardous substance;
- **E**nvironment – are there any constraints on the posture, slippery floors, variations in floor levels, poor lighting levels etc.

g) In order to reduce manual handling, mechanical handling aids are provided and consist of forklift trucks, bins and trolleys. Employees must make full use of mechanical handling equipment.

h) Employees will be provided with manual handling training which will include the following:

- Manual handling risk factors and how injuries can occur;
- How to carry out safe manual handling including good handling technique (see 'Good handling technique for lifting' and 'Good handling technique for pushing and pulling');
- Appropriate systems of work for the individual's tasks and environment;
- Use of mechanical aids;
- Practical work to allow the trainer to identify and put right anything the trainee is not doing safely.

i) Training will also include an assessment of employees' ability to perform safe lifting techniques and an understanding of the training received through a manual handling questionnaire.

3.13 Housekeeping

a) Slips, trips and falls can be prevented by good housekeeping and by maintaining the work area in a safe condition. Employees are reminded of their responsibilities in keeping their area of work safe and tidy. Access routes must be maintained to and from work areas by ensuring that materials and equipment are placed safely during the work process.

b) Employees must ensure that their activities do not place other employees, visitors, sub-contractors, customers and members of the public at risk; it is imperative that housekeeping is implemented as part of the work process.

c) Waste materials must be transferred to the relevant bins and waste skips provided.

d) Spillages must be dealt with immediately using spill kits and absorbent materials; warning notices must be displayed to highlight the hazard of slippery floor areas.

3.14 Work Equipment

a) The use of plant and equipment must be covered by documented Safe Working Procedures in order for the Company to comply with the provisions set out in the Provision and Use of Work Equipment Regulations 1998.

b) Work equipment must be:

- suitable for the intended use;
- safe for use, maintained in a safe condition and, in certain circumstances, inspected to ensure this remains the case;
- used only by people who have received adequate information, instruction and training; and
- accompanied by suitable safety measures, e.g. protective devices, guarding; markings, warning labels.

c) Work equipment includes **any equipment** which is **used by an employee at work** e.g. hammers, knives, shredders/balers, conveyors, photocopiers, computers, ladders, forklift trucks etc. Any equipment hire in by the Company e.g. cherry pickers is also included.

d) All plant and equipment operators must receive information, instruction and training in the safe use of plant and equipment. Information, instruction and training must include:

- All health and safety aspects arising from the use of the work equipment;
- Any limitations on the use;
- Any foreseeable difficulties that could arise;
- The methods to deal with them; and
- Using any conclusions drawn from previous experience using the work equipment so that all operators and affected employees are aware of them.

e) Managers must ensure that the use of work equipment is in accordance with:

- Suitable guards to prevent access to dangerous parts;
- Protective devices, e.g. interlock switches and trip wires;
- Provision of safety signs, labels and warning devices;
- Emergency stop buttons; and
- Covered by a safe system of work;
- Provision of information, instruction and training; and
- Provision of suitable personal protective equipment.

f) Employees must be familiar with the use of tools and equipment and must ensure that it is used for its intended purpose in accordance with manufacturer's instructions and safe working procedures.

g) Employees are responsible for checking and carrying out day to day maintenance on machinery. Where necessary competent contractors will undertake servicing and repairs. A maintenance log for plant must be completed and be kept up to date.

h) Work equipment must be safely isolated during maintenance and repairs. Energy sources must be safely isolated e.g. electricity, pressure (hydraulic or pneumatic). Safe isolation procedures (permit to work systems; captive key systems; multiple locking devices) must be implemented to ensure that maintenance employees and contractors are not put at risk.

i) Operators are required to carry out pre operation checks to ensure that plant and equipment is maintained in a safe and efficient working order. Any defects noted must be reported to a Manager in order for an assessment to be made to determine whether the equipment is safe or whether it must be taken out of use.

j) Formal examination, inspection and testing will be carried out for plant and equipment, as required, by statutory requirements; where there are safety critical parts or where the conditions of use could lead to deterioration and therefore give rise to significant risk, e.g. forklift trucks, balers and shredding machines.

k) All plant and vehicle operators must adhere to the site rules in relation to traffic routes, speed limits and procedures for the segregation of vehicles and pedestrians.

l) The purchase of work equipment must be co-ordinated to ensure that the equipment complies with EC Directive, which is relevant to the equipment. The specification of equipment must comply with current health and safety legislation and the equipment should bear CE marking and be accompanied with the relevant certificates or declarations.

m) Directors / Managers must ask for a copy of the EC Declaration of Conformity as required by relevant product Directives. Directors / Managers must also check that equipment is supplied with adequate operating instructions and that there is information regarding residual hazards such as noise and vibration.

n) New equipment must be checked for obvious faults; the supplier should be able to give further advice about what the equipment is designed for and what it can or cannot be used for.

3.15 Safety Monitoring

a) In order to assess the implementation of the health and safety policy and to measure the effectiveness for controlling risk, health and safety monitoring will be carried out.

b) Active safety monitoring will be carried out which includes a review of the health and safety policy; action plans; routine inspections and checks to ensure that preventative and protective measures are in place and effective. Active monitoring will reveal whether the health and safety management system is functioning correctly.

c) Reactive safety monitoring will be triggered after the event and includes; injuries and cases of ill health; losses such as damage to property or equipment; incidents with the potential to cause injury, ill health or loss; hazards; weakness or omissions in the safety management system. The results of monitoring will be fed back into the safety management system in order to ensure continual improvement.

d) Managers and Supervisors are responsible for carrying out the daily monitoring and observance of health and safety procedures and arrangements in their areas of control. This will include a daily floor walk of the area and taking the appropriate action where health and safety hazards or issues are identified.

e) Health and safety representatives will carry out routine inspections of their work areas and report the findings to Directors. They will also provide assistance and will be included in the investigation of accidents, near miss incidents, potential hazards and complaints by an employee relating to health, safety and welfare at work.

f) Safety monitoring will be recorded on relevant templates and will be analysed and discussed at health and safety committee meetings, in order to identify any underlying themes or trends, which may not be apparent for looking at events in isolation. Priorities will be established for necessary remedial action to ensure that safety issues are dealt with and completed within a reasonable time.

g) An audit of the health and safety management system will be completed by the Health and Safety Co-ordinators with assistance from Ranmoor Health and Safety Ltd.

3.16 Consultation and Communication

a) In order for the Company to comply with the provisions of the Health and Safety (Consultation with Employees) Regulations 1996 (as amended), employees will be consulted on matters, which affect their health and safety. Not only is consulting employees a requirement under law it is also good management practice. Employees are a valuable source of information and can provide feedback about the effectiveness of health and safety management arrangements and control measures.

b) All employees are encouraged to take part in two-way health and safety consultation. Health and safety committee meetings will take place where health and safety representatives will be invited to raise concerns / issues on behalf of employees. Committee meetings will be held quarterly.

c) Employees will be kept informed, by the Health and Safety Co-ordinator's, on health and safety matters, which affect their working activities. This will include the following:

- Health and safety action plans;
- Minutes from health and safety meetings;
- Accidents statistics; and
- Any changes in processes, e.g. risk assessments and safe working procedures.

d) Health and safety information will be provided to employees and will be displayed on health and safety notice boards in each department, safety messages in wage slips and toolbox talks.

3.17 Work at Height

a) Where Work at Height is required adequate arrangements must be in place to ensure that the risks to health are reduced to an acceptable level. Managers and Supervisors must be involved in the organising, planning and supervision of work at height and the use of access equipment.

b) A risk assessment and safe working procedures have been undertaken for work at height in order for the Company to comply with the provisions set out in the Work at Height Regulations 2005.

c) Employees are responsible for checking access equipment before use; any defects noted must be either rectified where possible or be reported to a Manager.

d) The following rules apply to the use of stepladders including aircraft style ladders and extension ladders.

- Stepladders must be positioned on steady ground, must be fully opened and locked in position
- Aircraft ladders must be positioned and the brakes applied to lock the wheels
- Ladders must be chained and locked when not in use; keys to locks must be signed out and be recorded in a book;
- Ladders should be secured so that they cannot slip either at the top or the bottom;
- Ladders should be angled to minimise the risk of slipping outwards, as a rule of thumb they should be positioned at a 75° angle or 'one out for every four up';
- Ladder should extend 1m above the working platform (this provides a handhold for people getting on and off);
- Do not overreach. The ladder must be long enough and positioned to reach the work safely;
- Do not climb or work off a ladder unless you can hold onto it.

e) Access platforms and walkways must be inspected as part of routine inspections in order to rectify any deterioration, which can be detected and remedied in good time.

f) Guardrails must be positioned to prevent a person falling from height. This will include the guarding of platforms; walkways; conveyors; floor openings; and access areas on machinery. They must be checked to ensure that they are safe and are of adequate strength and stability to prevent a person falling from height. Where barriers are removed for access or maintenance and repairs they must be replaced.

3.18 Health Surveillance

a) The Company will ensure that we comply with the provisions set out in the Management of Health and Safety at Work Regulations 1999 and the Control of Substances Hazardous to Health (COSHH) Regulations 2002, in relation to health surveillance. Employees will be provided with appropriate health surveillance based on the outcome of the risk assessment(s) associated with work activities.

b) Health surveillance is provided in order to assess the health of employees and watch out for any early signs of work related ill health in employees exposed to certain risks. The Company will make provisions for health surveillance (where necessary) through the appointment of a Doctor or Occupational Health Practitioner.

c) Where necessary, a record of health surveillance provided for each employee will be kept and maintained by the company, these records will be kept as long as the employee is under health surveillance and or as required in line with COSHH requirements, which can be a period of up to 50 years.

d) Health surveillance can be beneficial as it will:

- Provide information so the Company can detect harmful ill health effects at an early stage, thereby protecting employees;
- Check that control measures are working well in conjunction with risk assessments;
- Provide data (health records) to detect and evaluate health risks;
- Provide an opportunity to train and instruct employees further in safe and healthy work practices, e.g. use of personal protective equipment; and
- Give employees the chance to raise any concerns about the effect of their work on their health.

e) Employees are required to co-operate with the Company during any health surveillance program. The information input from employees is vital in ensuring that work processes are controlled to reduce the risk to health. Employees are encouraged to report any symptoms of ill health as soon as they notice them so that the Company can take prompt action. Where health issues are identified the Health and Safety Co-ordinator and Safety representatives will be involved in order to decide how best to manage change to work practices.

f) Managers must ensure that all new starters complete a medical questionnaire in order to ensure their fitness for work relative to the work area and the environment where they will be placed.

g) All medical information and discussions regarding health issues will be treated in confidence so that employees' rights are protected; the Company will observe the requirements of the Data Protection Act.

3.19 Vehicle Safety

a) In order to ensure the safety of our employees who have occasion to drive on Company business the Company will comply with the provisions of the Health and Safety at Work Act 1974; Road Traffic Act and the Road Vehicle (Construction and Use) Regulations.

b) The company has developed a Driving Policy, which sets out the requirements of the Company, for the safe use of vehicles used on company business.

c) As well as safeguarding the health and safety of our employees we also recognise the risk to other road users and pedestrians out of and in connection with our work activities.

d) The Company will carry out a risk assessment in relation to driving at work and will implement suitable control measures in order to minimise the risks. The personal responsibility placed on employees cannot be ignored; employees have a responsibility to ensure that they are fit to drive and that the vehicle is maintained in a safe road worthy condition. Many accidents happen due to inattention and distraction as well as failure to observe the Highway Code.

e) Only authorised employees are permitted to drive Company vehicles. All drivers must ensure that vehicles are safe to drive and are regularly inspected and serviced in accordance with the manufacturer's instructions. Drivers are required to carry out a daily walk around check of the vehicle completing a vehicle defect report. The Company will ensure that Company vehicles are serviced and inspected to ensure that they are safe.

f) All drivers must hold a full, current UK driving license. Employees who are entitled to drive a company vehicle are required to co-operate with the company during 6 monthly DVLA licence checks. The employee is required to have their driver licence number; national insurance number and postcode information in order to facilitate the check through the DVLA online checking facility. A driving licence register will be maintained by the company.

g) All drivers must adhere to the Highway Code, in particular the laws regarding speeding, drinking / drugs and driving, loading of vehicles, and the use of mobile phones. Under no circumstances must hand held mobile telephones be used whilst driving. Where hands free kits have been provided the use of phones should be kept to a minimum. In these circumstances the driver is advised to inform the caller that they are driving and or pull over to take or make a call.

h) Drivers must ensure that their eyesight satisfies the requirements set out in the Highway Code. Drivers must not drive when taking medication, which may impair their judgement.

i) Drivers carrying goods must ensure that the vehicle load weight limits are observed and the load is properly secured on the vehicle.

j) Managers must ensure that route planning is undertaken to ensure that delivery and collection schedules are organised for efficiency and safety. Consideration must be given so that undue pressure is not placed on driver's which ultimately may encourage them to take risks, e.g. driving at excessive speeds because of agreed arrival times.

k) Drivers must adjust driving in accordance with weather conditions; journey times and routes may have to be rescheduled due to adverse weather conditions.

l) It is the responsibility of employees to report all accidents or damage, however minor to a Manager. Any traffic violations, which result in a prosecution, must also be reported to a Manager.

3.20 Noise at Work

a) Where noise hazards are identified at work, the Company will ensure that we meet our obligations under the Control of Noise at Work Regulations 2005.

b) A risk assessment will be undertaken to establish the noise levels in relation to the 'daily or weekly personal noise exposure' levels, which are a lower exposure action value of 80dBA; an upper exposure action value of 85dBA and a exposure limit value of 87dBA. The findings of risk assessments will determine the measures needed to reduce the noise hazard.

c) Where work processes are assessed at 80dBA and below 85dBA, employees will be provided with hearing protection where requested.

d) Where work processes are assessed at or above 85dBA a 'hearing protection zone' will be established for the mandatory wearing of hearing protection, marked by signage. Employees will be provided with hearing protection, which must be worn in these areas. It is the responsibility of employees to ensure that hearing protection is worn at all times during noisy processes.

e) The exposure limit value of 87dBA must not be exceeded. Where a work process is assessed at or above 87dBA hearing protection can be taken into account in order to achieve a reduction of noise at the ear.

f) The findings of the risk assessment will be used to create a noise control action plan, which must be implemented in order to control noise.

g) Where possible Directors / Manager must give consideration to noise during the purchase and hire of equipment. Choosing quieter equipment and machinery will assist the Company in achieving the control of noise and therefore reduce the costs of introducing noise control measures. Ensure that manufacturers and suppliers of machinery and equipment provide information on noise output levels.

h) Employees likely to be affected by noise will be provided with information, instruction and training, which will include the correct use and care of hearing protection. Managers / Supervisors must ensure through observations that where required, employees are wearing hearing protection.

i) Audiometric testing will be provided for relevant employees where it is likely that they will be exposed to levels of noise, which are at or above the upper exposure action values of 85dBA. Audiometric testing will also be provided for other employees who are occasionally exposed above the upper exposure action values and who are particularly sensitive to noise induced hearing loss.

3.21 New and Expectant Mothers

a) In line with the Management of Health and Safety at Work Regulations 1999, the Company will ensure the safety of workers at our premises, who are pregnant, those who have just given birth and those who are breast-feeding.

b) In order to comply with the above Regulations the Company will:

- Assess the risks to health caused by the normal work activity of these employees;
- Ensure that these employees are not exposed to a health risk during the course of their work activity; and
- Take suitable and preventative action to ensure the well being of these employees.

c) Managers must carry out a risk assessment to ensure that the worker is not placed at significant risk; take into account the work process; environment; conditions and any hazardous substances, which could affect the pregnant worker; unborn child; or any cross contamination through breast feeding.

d) Where necessary and in conjunction with risk controls, necessary adjustments will be made to ensure the safety of the worker; the unborn child and a breastfeeding child.

e) As well as hazards and risks arising from the work, Managers must also consider other factors of the pregnancy that may affect work (see Table below). The impact will vary during the course of the pregnancy and the effects to the pregnant worker will be under review, e.g. the postural changes as the expectant mother copes with increasing size.

Aspects of pregnancy	Factors in work
'Morning' sickness Headaches	Early shift work Exposure to nauseating smells
Backache	Standing / manual handling/posture
Varicose veins	Standing / sitting
Hemorrhoids	Work in hot conditions
Frequent visits to the toilet	Difficulty in leaving job / site of work
Increasing size	Use of protective clothing Work in confined spaces Manual handling
Tiredness	Overtime and evening work
Balance	Problems of working on slippery, wet surfaces
Comfort	Problems of working in tightly fitting work uniforms

f) New and expectant mothers are required to:

- Notify the Company that they are pregnant or breast-feeding (this must be in writing in the form of a certificate from a registered midwife or registered medical practitioner);
- Co-operate with the Company to ensure that a risk assessment is undertaken and reviewed at regular intervals; and
- Keep the Company informed of any significant changes in their health or the pregnancy.

g) The risk assessments must be reviewed at regular intervals to ensure that risk control measures remain effective. Managers should undertake a review every 4 – 6 weeks during the pregnancy or sooner as required where safety or health issues are identified.

3.22 Young Persons

a) In line with the Management of Health and Safety at Work Regulations 1999, the Company will ensure that no young person is allowed to start work unless a risk assessment has been undertaken. We recognise that a young person may be vulnerable in the workplace as a result of inexperience, lack of maturity, and a general absence or awareness of existing or potential risks.

b) For the purposes of the regulations a Young Person (YP) is categorised as follows:

- A Child under the Minimum School Leaving Age (MSLA)
- A Young Person between the age of 16 - 18

c) The risk assessment should take into consideration the increase in hazards and risks to the YP and the control measures, which are required to safeguard them. Risk assessments will take into consideration any work which.

- is beyond their physical or psychological capacity;
- exposes them to substances chronically harmful to human health, e.g. toxic or carcinogenic substances, or effects likely to be passed on genetically or likely to harm the unborn child;
- exposes them to radiation;

- involves a risk of accidents which they are unlikely to recognise because of e.g. their lack of experience, training or attention to safety;
- involves a risk to their health from extreme heat, noise or vibration

d) Where necessary and in conjunction with work requirements the items listed in c) may be carried out by the YP as follows:

- where it is necessary for their training;
- where the YP will be supervised by a competent person; and
- where risks have been reduced to the lowest level that is reasonably practicable.

A child under the MSLA must not be employed to undertake any work listed in c).

e) Managers and Supervisors must ensure that an assessment of the risks that the YP is exposed to is undertaken before the work commences. The YP must be informed of the risks to health and safety from the assessment and the control measures put in place to protect them. Where a YP under the MSLA is employed, the parent or carer must be informed of the key findings of the risk assessment and the control measures taken.

f) In addition a young person in the workplace must receive a safety induction; adequate information, instruction and a higher level of training and supervision to take into account their inexperience and unfamiliarity of the working environment.

3.23 Personal Protective Equipment (PPE)

a) The Company recognises our responsibilities under the Personal Protective Equipment (PPE) Regulations 1992. These regulations seek to control the provision, maintenance and use of PPE in the workplace.

b) In order to secure compliance with the above regulations the Company will provide PPE when the risk presented by a work activity cannot be adequately controlled by other means. Risk assessments and safe working procedures will be undertaken to determine the requirements for PPE and types of PPE most suited to the job.

c) Managers are responsible for overseeing the issue and implementation of PPE. When assessing the suitability of PPE, Managers must ensure that that the assessment takes into consideration:

- The prevention and adequate control of the risk without increasing the overall level of risk;
- The adjustment of PPE to fit the wearer correctly;
- The state of health of workers using the PPE is taken into account;
- The needs of the job and demands on the wearer, e.g. length of time PPE is worn, physical effort required to do the job, visibility and communication;
- Compatibility of PPE if more than one item is worn e.g. does a type of respirator make it difficult for eye protection to fit properly.

d) In selecting PPE we will: -

- Identify tasks that require the employee to use PPE.
- Select and issue the correct type and standard of PPE.

- Maintain the PPE and replace it in the event of its failure.
- Provide suitable storage for PPE.
- Train the employee in the correct use of PPE.

e) Employees must: -

- Wear all appropriate PPE provided by the Company.
- Ensure that equipment is suitably maintained and looked after.
- Use the lockers provided for storing PPE.
- Report any defects or problems with the PPE as soon as practicable.

f) No charges will be levied for the issue of PPE or for replacement of equipment that has failed due to normal wear and tear. On the receipt of PPE employees will be required to sign a PPE issue form.

3.24 Smoking

a) In order to ensue that our employees, customers, contractors and members of the public are protected from second hand smoke, our premises are smoke free. Smoking is prohibited in all enclosed and partially enclosed premises, this includes Company vehicles and the yard areas.

b) All employees are obliged to adhere and support this requirement; therefore the Company will ensure that all employees are informed of their role in the implementation and monitoring of this policy.

c) Appropriate 'No Smoking' signs will be clearly displayed at the entrances to and within the premises and in Company vehicles.

d) Disciplinary procedures will be followed if an employee chooses not to comply with this policy. Those who do not comply with the smoke free law may be liable to a fixed penalty fine and possible criminal prosecution.

e) If an employee requires help to stop Smoking, the NHS offers a range of free services, to help you to give up call the NHS Smoking Helpline on 0800 1690169.

3.25 Stress at Work

a) The Company is committed to protecting the health, safety and welfare of employees and in doing so we recognise the hazard of workplace stress. We also understand that the HSE define workplace stress as; "the adverse reaction people have to excessive pressure or other types of demand placed on them" and therefore an occupational safety and health issue.

b) The importance of identifying and reducing workplace stressors is acknowledged. This policy will apply to everyone. Managers will be responsible for its implementation and for providing the necessary resources.

c) Workplace stress where relevant will be identified in our risk assessments including the identification of workplace stressors and the controls required to eliminate stress or control the risks from stress. These Risk Assessments will be reviewed regularly.

d) If an employee believes that they are suffering from stress or are struggling with their work based activities then they have the facility of being able to contact their Manager / Director to discuss the issues. If employees are feeling under Stress, they are encouraged to get help and not wait for the problem to build up. Employees are therefore urged to talk to someone immediately.

e) **Employee Responsibilities**

If it is a work problem or a home problem affecting an employee's work, then they are encouraged to discuss it with a Director / Manager. The Director / Manager will then know the situation and treat the matter in confidence, wherever possible. On occasions, the Manager may recommend the involvement of an Occupational Health Practitioner.

f) **Management Responsibilities**

- Conduct and implement recommendations from risk assessments.
- Ensure good communication between management and employees, particularly where there are organisational and procedural changes.
- Ensure that all employees are fully trained to discharge their duties.
- Ensure that employees are provided with meaningful development opportunities.
- Monitor workloads to ensure that people are not overloaded.

3.26 Alcohol and Drugs

a) The Company will not tolerate any employee under the influence of or in possession of alcohol or an illegal drug whilst at work. Any employee who is found in such situations will be removed immediately from Company premises and / or areas of work under the Company's control and will be subjected to appropriate disciplinary measures, which could include dismissal.

b) Employees are reminded of their duty in relation to their acts or omissions and their responsibility to safeguard themselves and others who may be affected by their actions.

c) If an employee suspects that a colleague or subcontractor is at work under the influence of alcohol or drugs this must be reported immediately to a Director / Manager.

d) The Company reserves the right to carry out spot checks to ensure that all employees are complying with this policy.

3.27 Environment

a) The Company is committed to minimising the impacts of our activities on the environment and to preventing pollution.

b) The Company is also committed to the continual improvement of our environmental performance and undertakes to achieve this by:

- Implementing and operating an environmental management system in accordance with the requirements of ISO 14001:2015 Environmental Management System
- Complying with all relevant legislation from our operations.

- Reducing polluting emissions from our operations.
- Minimising waste and recovering or recycling waste wherever possible.
- Reducing energy and raw material use and considering the use of more sustainable materials.
- Raising environmental awareness of all employees, suppliers and contractors.
- Undertaking regular reviews of the environmental management system to ensure the requirements of the Company's environmental policy, objectives and targets are met and remain appropriate.

c) This policy will be communicated to all employees and interested parties; a copy of the policy will be displayed on notice boards.

3.28 Asbestos

a) An asbestos survey has been undertaken for the site in order for the Company to comply with the provisions of the Control of Asbestos at Work Regulations 2012.

b) Asbestos will be monitored under the 'Duty to Manage' and will undergo monitoring to ensure that its condition does not pose a risk to health through damage or deterioration which could release fibres into the air.

c) A survey will be conducted prior to any construction or demolition work to assess the risk and control exposure to airborne asbestos fibres. Employees are forbidden from carrying out work on Asbestos Containing Materials (ACM).

d) Maintenance workers and contractors must read a copy of the asbestos register prior to work being undertaken. Furthermore employees and contractors must be informed of the location of ACM and the precautionary measures which must be taken to avoid exposure to asbestos.

e) Contractors who are likely to be exposed to the risk of asbestos due to the nature of the work, e.g. maintenance activities, must have received asbestos awareness training.

f) Where ACM is damaged or disturbed work must cease immediately and this must be reported to a Manager or Supervisors so that an assessment of the risk can be undertaken. An external licensed asbestos contractors will be informed so that corrective action can be taken immediately; this may involve evacuating and isolating the immediate area.

3.29 Mental Health First Aid Policy

a) The Company seeks to promote good mental health within the workplace. In line with our duty of care we will promote mental health awareness to ensure that any staff member experiencing poor mental health is provided with access to mental health support.

b) We will produce, implement and communicate a mental health at work plan. We will also develop mental health awareness amongst employees through the provision of information displayed on noticeboards in welfare areas including toilets and the sharing of information through Toolbox Talks and briefings. In addition to this, we aim to provide employees with a good working environment and the promotion of good employee wellbeing.

c) We encourage any staff member who is experiencing poor mental health to notify either the Mental Health First Aider or their Line Manager in the first instance.

d) We will provide trained Mental Health First Aiders who will assist the company in providing the following:

- Spot the early signs of a mental health issue
- Provide initial help to any staff member experiencing a mental health issue
- Preserve life where a staff member may be at risk of harm to themselves and others
- Assist in preventing mental health issues from getting worse
- Promote recovery of good mental health
- Guide a staff member towards appropriate treatment or other sources of help
- An understanding of the stigma that exists around mental health

e) **Confidentiality**

The company will respect the privacy of information relating to staff who are experiencing a mental health problem or who have received mental health first aid.

Mental Health First Aiders must confidentially log the support conversations they have with colleagues. Support conversations should have a recommended duration of up to 30 minutes. Below is the format which the Mental Health First Aider must take to collect useful but anonymous information:

Date of conversation:	
Department/Team:	
Theme of conversation: (e.g. work-related or personal life)	
Signposting recommendations given:	
Length of conversation:	

However, if at any time, the Mental Health First Aider assesses a potential risk of harm to the individual receiving mental health first aid or other, the matter must be shared with the Managing Director

If the individual receiving mental health first aid is at urgent risk, emergency services must be contacted immediately.

f) **Supporting tools and information**

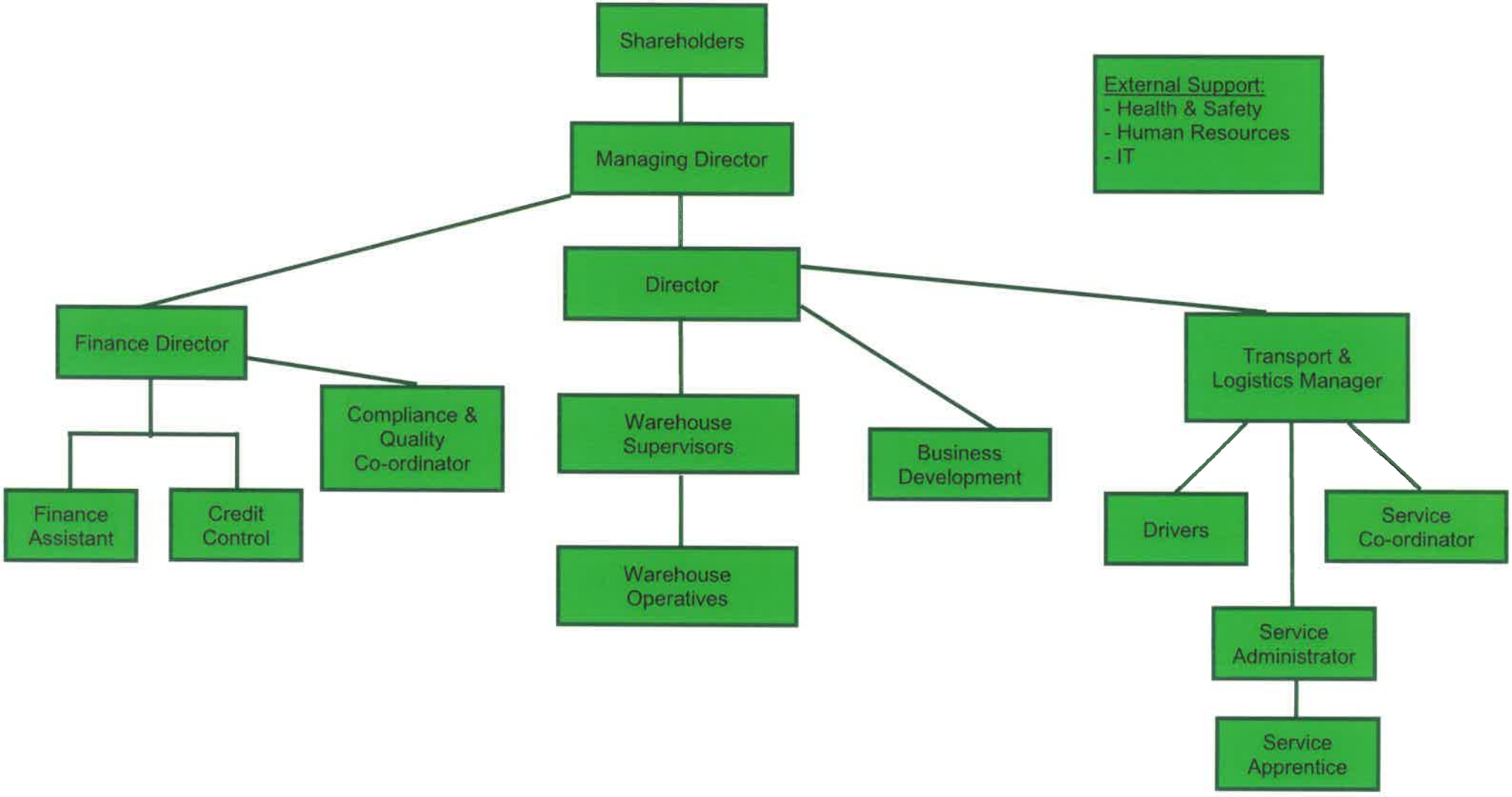
- All information included in this Mental Health First Aid policy, plus additional resources can be found by visiting MHFA England's website (mhfaengland.org).
- Contact Numbers:

  -Samaritans – 116 123

  -SANE - 020 3805 1790

4 APPENDICIES

APPENDIX 1 - SAFETY RESPONSIBILITIES (FAMILY TREE)



APPENDIX 2 - SAFETY COMMITTEE

Committee shall consist of: -

- Directors
- Health and Safety Co-ordinator
- Supervisors
- Employee Representatives
- Specialists; e.g. Ranmoor health and Safety Ltd (as and when required)

Meetings to be held quarterly, additional meetings may be convened at the request of management.

APPENDIX 3 - ADDRESSES

Factory Inspectorate:

Health and Safety Executive
Foundry House
3 Millsands
Riverside Exchange
SHEFFIELD
S3 8NH

Tel 0203 0285001

Employment Medical Advisory Service

Health and Safety Executive
Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS

Tel: 0300 0031747

Local Fire Authority:

South Yorkshire Fire & Rescue Service
Command Headquarters
Eyre Street
Sheffield
S1 3FG

Tel: 0114 272 7202