

An Alternative approach to Education

Health and Safety Management System





Introduction

The main purpose of health and safety law is to prevent unsafe acts or situations which may arise, thus reducing the likelihood of accidents occurring and preventing injury or loss of life. Safety legislation provides clear information and guidance for us, it has been formulated to assist and protect us all. Risk occurs, it is an inevitable factor, but it must be managed to create a safe working environment.

We take health and safety seriously and we understand our duties as an employer. It is our intention to fully embrace all aspects of health and safety law applicable to us.

We intend to manage and conduct our activities safely to avoid any harm to persons who may be affected either directly or indirectly by our activities.

Our Health and Safety Management System and documentation has been prepared following the Health and Safety Executive defined guidelines as set out in the guidance note 'HSG65' and utilises agreed principles to achieve our intentions: a safe place of work. It follows the Plan, Do, Check, Act, concept of risk management.



Health and Safety Management System

Our Health and Safety Management System consists of the following elements:

Our Health and Safety Management System is provided to state our intentions and set a clear direction for people to follow. We expect all our employees to understand and comply with our arrangements.

We have ongoing commitments to achieve our intentions and maintain high standards. To help us meet these commitments employees will be empowered to assist with certain tasks. Information is provided to employees describing responsibilities and duties of key people. We will provide training where it is required.

To ensure our workplace is safe and risk is managed effectively we have devised safety arrangements. It is important that we fulfil our duties with respect to legislation and guidance that applies to us. We recognise that continuous improvement is vital to help us maintain our standards and achieve compliance.

An amendment status record is included at the end of this section. This information helps us to manage and control our documentation ensuring it remains current.

The Health and Safety Management System will be reviewed at least annually. The date of review will be indicated on the Health and Safety Statement of Intent.

Overview

There is a moral obligation on us to take care of everyone at work and those who might be affected by the work we undertake. This is reflected in Common law, in Statute law and enforced by the regulatory authorities. Health and safety legislation goes further than just 'common sense' or 'reasonable care' and places duties of absolute, practicable or reasonably practicable care.

We have a clear understanding of the duties placed on us and ensure that we have 'suitable and sufficient' assessments, systems, and control measures in place.

This Health and Safety Management System and guidance written form the basis of our intentions. This will be supported with training for employees at the appropriate level and detail.

Identifying the relevant legislation and implementing safety systems is the first step to our compliance – maintaining standards with regular checks and audits is also required. The enforcement agencies expect compliance, and this is the best way to avoid accidents and incidents occurring.

Regardless of whether there has been an accident or incident it can result in enforcement action and fines, especially following the implementation of Fee for Intervention (FFI) which allowed the Health and Safety Executive to charge for their visits when a breach is noted.

Copies of the key pieces of legislation (acts and regulations) are freely available online and this is supported with more user-friendly publications in the form of 'approved codes of practice' and 'guidance notes' from the website www.hse.gov.uk. We will obtain copies in the first instance of the legislation of most relevance to us. These documents provide information on the fundamentals for establishing a sound Health and Safety Management System. A summary of the key legislation is provided below – for our information. We have identified legislation that we consider is applicable to us. The following list has been compiled to help draw our attention to this information and to our duties.

- The Health and Safety at Work etc. Act 1974
- Corporate Manslaughter and Corporate Homicide Act 2007
- Employers' Liability (Compulsory Insurance) Act 1969
- Management of Health and Safety at Work Regulations 1999 (as amended)
- The Regulatory Reform (Fire Safety) Order 2005
- Workplace (Health, Safety and Welfare) Regulations 1992
- The Control of Substances Hazardous to Health Regulations 2002 (as amended).
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- The Manual Handling Operations Regulations 1992 (as amended)
- Health and Safety (First Aid) Regulations 1981 (as amended)
- Personal Protective Equipment at Work Regulations 1992 (as amended)
- Personal Protective Equipment at Work (Amendment) Regulations 2022
- Health and Safety (Display Screen Equipment) Regulations 1992 (as amended)
- Health and Safety (Safety Signs and Signals) Regulations 1996 (as amended)
- Electricity at Work Regulations 1989
- Health and Safety (Consultation with Employees) Regulations 1996 (as amended) and Safety Representatives and Safety Committees Regulations 1977 (as amended)
- Control of Vibration at Work Regulations 2005
- Control of Noise at Work Regulations 2005
- Health and Safety Information for Employees Regulations 1989 (as amended)
- Provision and Use of Work Equipment Regulations 1998
- The Working at Height Regulations 2005 (as amended)
- Control of Asbestos Regulations 2012
- Dangerous Substances and Explosive Atmospheres Regulations 2002
- Employment of Women, Young Persons and Children Act 1920
- Equality Act 2010
- Furniture and Furnishings (Fire) (Safety) Regulations 1988 (as amended)
- Gas Appliances (Safety) Regulations 1995 (as amended)
- Health and Safety Offences Act 2008
- Health and Safety (Training for Employment) Regulations 1990
- Working Time Regulations 1998 (as amended)
- Public Health (Control of Disease) Act 1984

Management of Documentation We will ensure that all amendments are incorporated, and that each revision or re-

issue is recorded.

Issue Number	Reason for Issue / Amendments	Name	Date
1.	Initial	Wirehouse ES Ltd	June 2023
2.			
3.			
4.			
5.			
6.			
7.			
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Issue Details

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Implementation Guide and Record

Our Safety Management System is a key tool for us to use to help educate employees on their responsibilities and safe ways of working and to manage risk effectively and proactively. We will use the record below to record the key stages of the implementation of our Health and Safety Management System and to track progress towards compliance. We will amend this as required.

Date Started	Key Activity	Evidence - Location of the Records, Documents
01/09/2023	Initial Audit and Action Plan	
01/09/2023	Statement of Intent Signed	
07/09/2023	Employee Handbooks Issued	
	Employee Handbook	
	Acknowledgement Form Returned	
01/09/2023	Fire Risk Assessment	
	Completed	
01/09/2023	Fire Marshals Appointed	
01/09/2023	Fire Log Book Established and	
	Evacuation Drills Scheduled	
01/09/2023	PEEPs Documented	
01/09/2023	Legionella Risk Assessment	
	Completed	
01/09/2023	Legionella Controls	
	Documented	
01/09/2023	Risk Assessment Index	
	Compiled	
01/09/2023	Risk Assessments Completed	
01/09/2023	Specific Risk Assessment	
	Completed for:	
	Home Working	
	Lone Working	
01/09/2023	Hazardous Substances	
	Inventory Sheet completed	
01/09/2023	Hazardous Substance Risk	
	Assessments Completed	
01/09/2023	Training Matrix Established –	
	Needs Analysis Compiled	
OCT 2023	Workplace Inspections Started	
01/09/2023	Health Surveillance	
01/09/2023	Review Action Plan	





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Chapter 1. Statement of Intent



Health and Safety Statement of Intent

It is the Plan B Community Interest Company policy to ensure, so far as is reasonable, the health and safety of all persons affected by our work activities. The minimum standard we will adopt will be compliance with legal requirements and the associated appropriate codes of practice. However, our aim is not to only fulfil the spirit of the law and comply with technical requirements, it is to uphold the highest of health and safety standards. We will assess the risks from our activities and will operate according to the procedures that best promote health and safety at work.

We accept our responsibilities for health and safety and are committed to giving health and safety equal importance with other business matters. We will ensure that the resources necessary to achieve the objectives of this Health and Safety Management System are made available to all. We require cooperation from all employees to enable us to fulfil our legal duties and the objectives of this Safety Management System. To promote co-operation, procedures for consulting employees are built into this Health and Safety Management System. They have a duty to follow the standards and procedures laid down by us.

Equipment that enables tasks to be carried out safely will be provided and maintained to ensure their safe operation. Employees will be provided with appropriate training and instruction considered necessary to ensure that they know how to work safely. Risk assessments will be documented for significant tasks and where exposure to hazards cannot be prevented by any other means, appropriate personal protective equipment will be provided and instruction in its use and maintenance given.

We will maintain our premises in a safe manner and suitable facilities for welfare will be provided and maintained, as will arrangements to ensure access to first aid.

The Directors have ultimate responsibility for health and safety and will nominate a competent person to manage operations day to day. Other responsibilities for health and safety matters have been assigned as appropriate and are described in our 'Responsibilities' section of the Health and Safety Management System.

The Directors and Managers will oversee an annual review of this Health and Safety Management System and associated procedures to ensure their continued effectiveness. Where necessary to ensure legal compliance and promote continuous improvement, the Health and Safety Management System and associated guidance will be amended and communicated.

Signed: *VMGillard* Director

Date:01/09/2023.....



Environmental Policy Statement

The Plan B Community Interest Company will help to sustain natural resources and protect the environment. We are committed to ensuring the health, safety and welfare of any person who may be affected by the waste materials that result from our work.

Whilst the environmental obligations and responsibilities fall to all of us, management are primarily responsible for ensuring our environmental implications are inherent considerations in all our business decisions. Management are ultimately responsible for the implementation and promotion of this policy.

We will arrange for the disposal of our waste products regularly, safely and in accordance with the statutory requirements. We will actively re-use packaging materials wherever possible, including folders and documentation.

Our waste disposal arrangements will be regularly reviewed and will ensure that our paper and cardboard waste is recycled wherever possible and disposed of responsibly where not. Recycling initiatives will be taken where possible to help protect the environment and make better use of our resources. Our employees are asked to consider the environment when printing.

Where possible the most environmentally friendly equipment will be provided with due consideration to those employees who work from home, ensuring that the consumption and energy required is considered prior to purchases.

We recognise that the empowerment of our employees is our strongest weapon in the battle for environmental protection and will therefore arrange for suitable training and awareness where possible on environmental implications of our work activities and the controls that are within our control. We will encourage our employee's involvement in developing environmental improvements.

We seek excellence in every area of our work and are committed to continuing to improve our environmental performance by minimising our environmental impact and making resource efficiency the focal point and requirement of all our operations.

We will ensure that all company vehicles and vehicles used for work purposes where possible are designed and maintained to give the maximum fuel efficiency and minimum emissions. We will provide information on how to ensure maximum fuel consumption is met, such as the removal of unnecessary items in vehicles.

We aim to foster an understanding of environmental issues appropriate to and in the context of our business and those who work with us. Our intention is to ensure that we continually improve the environmental impact of our activities.

To achieve this commitment, we will:

- Strive to continuously improve our environmental performance, regularly reviewing our activities and policy and setting new targets to reduce any environmental impacts caused by our activities. This will include the consumption of energy within our premises, the reduction of waste materials including paper and cardboard through unnecessary printing.
- Comply with the requirements of environmental legislation and integrate approved codes of practice into our business operations.
- Reduce our consumption of resources and improve efficiency in the use of these resources.
- Ensure energy and water is used efficiently in all activities to minimise the consumption of natural resources and energy.
- Manage our operations and activities ensuring we reduce emissions, pollution and waste.
- Promote the reduction, reuse, and recycling of waste materials in all working activities to conserve resources and reduce waste disposal.
- Ensure all waste is disposed of in a safe and responsible manner through monitoring and taking necessary action where deemed appropriate,
- Procure goods and supplies which take environmental specifications into account, limiting the amount of waste products; we recognise that prevention is better than the cure.
- Raise awareness and encourage participation in environmental matters through discussions and training sessions for employees upon induction and at appropriate intervals.

We recognise our responsibility towards the protection of the environment and issue this statement as a commitment of both management and employees to minimising the environmental impact of our operations.

Signature: *VMGillard* Director

Date: 01/09/2023



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Chapter 2. Responsibilities



Duties and Responsibilities

We will ensure that employees are aware of their legal responsibilities whilst at work, the appointments forming our management structure and the duties and responsibilities allocated to respective employees.

We take seriously the health, safety and welfare of our employees and anyone else who may be affected by our work activities. We expect full cooperation from our employees to help us maintain safe working environments. It is our aim to create a positive safety culture and sustain high standards.

Employees empowered to organise, manage, and supervise work activities are instructed to ensure that our safety policies and procedures are followed always. Activities will be completed without significant risk of harm or loss and risks will be assessed and measures introduced to enable this.

Where employees have limited experience of activities involving risk, supervision will be afforded until such a time when satisfactory competence is deemed sufficient. Training needs will be assessed for all employees and the necessary training to enable them to work safely will be arranged.

Employees are instructed to refrain from using equipment likely to cause harm. If they notice any unsafe equipment, acts or situations they must act and report this.

We have in place a system for periodic monitoring. The purpose of this task is to continually assess our performance with respect to health and safety. People have been nominated with specific monitoring responsibilities, from time to time they may be requested to aid.

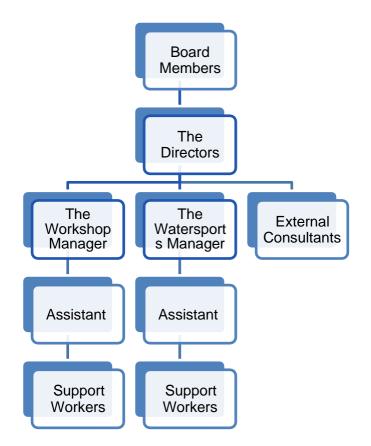
The Health and Safety at Work Act places duties on employees to:

- Take reasonable care of their own health and safety and that of anyone else affected by what they do.
- Cooperate with us, enabling us to comply with our statutory duties.
- Refrain from intentionally or recklessly interfering with or misusing anything provided in the interest of health, safety and welfare.

Employees are instructed to understand that failure to act and comply with legal duties may result with disciplinary action being taken against them, possibly by an enforcing authority.

Health and Safety Management Structure

This diagram is a representation of our management structure and strategy for health and safety responsibilities.



The Directors have ultimate responsibility for health & safety. At any time when an employee assigned with responsibilities is absent from work employees are instructed to consult a manager and raise any concerns regarding health and safety.

The Directors

The Directors have the overall and final responsibility for safety, health, fire and welfare. Contribution however is needed by all employees, to achieve a safe working environment.

Responsibilities include, but are not limited to:

- Understanding the Health and safety at Work Act and any other Acts, legislation or Approved Codes of Practice that apply to us and ensuring these are observed.
- Initiating our Health and Safety Management System for the prevention of injury, damage, and waste.
- Carrying out an annual review of the Health and Safety Management System.
- Ensure that we are supported and suitably advised on matters relating to health and safety.
- Setting objectives in relation to health and safety matters.
- Arranging adequate funds and facilities to meet requirements of our Health and Safety Management System.
- Ensuring that any inspection, testing, and certification is carried out to comply with relevant regulations.
- Ensuring that appropriate insurance cover is in place and maintained.
- Ensuring that suitable risk assessments are carried out by competent personnel and suitable records are maintained.
- Ensuring that risk assessments are reviewed regularly.
- Ensuring that all employees receive adequate and appropriate training.
- Ensuring that necessary health and safety inspections are undertaken within those areas and that prompt remedial action is taken when any unsafe practice or condition is apparent.
- Ensuring that suitable written records are kept and maintained of such inspections.
- Making reasonable enquiries to ensure that subcontractors engaged to work on our behalf and contractors engaged to work on our premises are competent to do so.
- Ensuring that disciplinary procedures are adequate to act against those who breach the Health and Safety Management System, rules or safe practices.
- Setting a personal example.

The Managers

Responsibilities include, but are not limited to:

- Familiarising themselves with our Health and Safety Management System.
- Ensuring that employees are adequately trained in proper and safe working methods and are fully aware of any hazards.
- Identifying training requirements of individuals and reporting this.
- Co-operation in releasing employees for training courses.
- Ensuring that all employees are aware of the fire procedures and first aid facilities.
- Seeking to develop safe practices and encourage suggestions from employees.
- Carrying out safety inspections in those areas under their control.
- Ensuring that necessary health and safety inspections are undertaken within those areas and that prompt remedial action is taken when any unsafe practice or condition is apparent.
- Ensuring that suitable written records are kept and maintained of such inspections.
- Ensuring that all safety rules are observed, and protective equipment is worn or used when appropriate.
- Ensuring that all safety devices are fitted, properly adjusted and maintained.
- Ensuring that all hazardous defects in the workplace are reported and subsequently rectified.
- Completing accident reports for all accidents involving injury, damage or lost time. Reports are to be completed as soon as possible.
- Ensuring that good housekeeping standards are maintained.
- Carrying out risk assessments to identify all hazardous activities and the risks associated with such activities.
- Bringing to the attention in writing of those concerned, the significant risks identified because of any such assessments.
- Stipulating safe systems of work, so that all work is carried out in accordance with Statutory and in-house regulations and Codes of Practice.
- Ensuring that all employees are effectively instructed in safe systems of work and that records of instructions are kept.
- Ensuring that risk assessments are reviewed regularly, particularly in respect to any new or proposed activities or processes.
- Ensuring that all visitors are made aware and comply with all aspects of health and safety legislation.
- Setting a personal example.

The Assistants to the Managers

Responsibilities include, but are not limited to:

- Familiarising themselves with our Health and Safety Management System.
- Ensuring that employees are adequately trained in proper and safe working methods and are fully aware of any hazards.
- Identifying training requirements of individuals and reporting this.
- Co-operation in releasing employees for training courses.
- Ensuring that all employees are aware of the fire procedures and first aid facilities.
- Seeking to develop safe practices and encourage suggestions from employees.
- Carrying out safety inspections in those areas under their control.
- Ensuring that necessary health and safety inspections are undertaken within those areas and that prompt remedial action is taken when any unsafe practice or condition is apparent.
- Ensuring that suitable written records are kept and maintained of such inspections.
- Ensuring that all safety rules are observed, and protective equipment is worn or used when appropriate.
- Ensuring that all safety devices are fitted, properly adjusted and maintained.
- Ensuring that all hazardous defects are reported and subsequently rectified.
- Completing accident reports for all accidents involving injury, damage or lost time. Reports are to be completed as soon as possible.
- Ensuring that good housekeeping standards are maintained.
- Carrying out risk assessments to identify all hazardous activities and the risks associated with such activities.
- Bringing to the attention in writing of those concerned, the significant risks identified because of any such assessments.
- Stipulating safe systems of work, so that all work is carried out in accordance with statutory and in-house regulations, and Codes of Practice.
- Ensuring that all employees are effectively instructed in safe systems of work and that records of instructions are kept.
- Ensuring that risk assessments are reviewed regularly, particularly in respect to any new or proposed activities or processes.
- Ensuring that all visitors are made aware and comply with all aspects of health and safety legislation.
- Setting a personal example.

The Employees

Responsibilities include the following, but are not limited to:

- Understanding and complying with any rules, policies and procedures introduced for health and safety and to comply with legislative requirements.
- Cooperate with the Management Team and other employees to create and maintain a safe working environment.
- Assisting us with the preparation of risk assessments or safety checks after suitable training.
- Co-operating with any risk assessments and control measures introduced.
- Not intentionally interfering with or misusing any safety devices or arrangements introduced in the interest of health and safety.
- Refraining from actions which are likely to cause harm to themselves or others.
- Keeping any work equipment in good condition.
- Assisting with workplace assessment activities upon request.
- Reporting any accident, unsafe act or condition.
- Ensuring that they understand our first aid arrangements and know where to seek assistance.
- Complying with our fire safety arrangements and participating with any evacuation drills.
- Informing us of any complaint, injury, illness or disease that they believe has been caused at work.
- Informing us of any personal circumstances, illnesses that may affect their safety or the safety and health of others whilst at work.
- Cooperating with us where an accident or incident is being investigated.
- Operating only items of equipment for which they have been trained, deemed competent and authorised to use.
- Helping us achieve and maintain good housekeeping standards.
- Setting a good example for others to follow.

Communication and Consultation

Health and safety arrangements, rules and procedures have been introduced to prevent accidents occurring thus protecting people against harm, however effective communication is vital to ensure these measures achieve their desired intentions.

We aim to consult with employees and others and will involve them in the decisionmaking process and development of our safety arrangements.

This Health and Safety Management System is made available to all employees, all employees will be made familiar with the contents.

The Employee Safety Handbook provides general safety information and refers to where further information can be obtained. It also provides details of our rules, procedures and arrangements. Employees will be made familiar with the handbook content.

We have devised our policies and guidance to ensure safe working practices are documented. Information relevant to each job or employee role will be communicated.

We have appointed various levels of management to implement, manage and assist with safety arrangements and procedures daily. Their duties include the communication of safety information to employees and others to ensure our policies, procedures and rules are being followed and standards are being maintained.

We will arrange the necessary training to ensure work is carried out without risk of harm. The management team are responsible for identifying any shortfalls with competence and consequent training needs. We will use credible and competent training providers for delivery of any external training.

It is inevitable that visitors and contractors will spend time at our premises. It is our intention to communicate any rules or procedures relevant to their safety to these persons. This we will do either whilst deciding for their visit or upon arrival.





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Chapter 3. Arrangements



Arrangements

Arrangements are the systems we have introduced to deal with our fundamental health, safety, fire and welfare needs. We have reviewed our work and considered what arrangements are necessary. Our arrangements have been introduced for the good and benefit of employees and others and to comply with legislative requirements.

We have considered the activities we expect employees to participate with and the environments where work takes place.

We ask that you speak to the Directors if there is anything you do not understand or believe could be improved.

Subject Area	Persons Responsible	Date Accepted
Instruction in safe working practices	The Directors and	01/09/2023
	Managers	
Training	The Directors and	01/09/2023
	Managers	
Health and Safety Inspections	The Directors and	01/09/2023
	Managers	
Office Safety	The Directors and	01/09/2023
	Managers	
Accident Investigation	The Directors and	01/09/2023
	Managers	
In house equipment	The Directors and	01/09/2023
	Managers	
Services (gas, electric etc)	The Directors and	01/09/2023
	Managers	
First Aid Provision	The Directors and	01/09/2023
	Managers	
Fire Equipment	The Directors and	01/09/2023
	Managers	
Fire Evacuations	The Directors and	01/09/2023
	Managers	
Housekeeping	The Directors and	01/09/2023
	Managers	
Risk Assessments	The Directors and	01/09/2023
	Managers	
Contractor Management	The Directors and	01/09/2023
	Managers	
Welfare	The Directors and	01/09/2023
	Managers	

Summary of responsibilities for key arrangements:

Accident Investigation

It is our intention to prevent all accidents occurring however we have systems in place to manage any such events. The Directors and Managers are nominated as the person(s) responsible for ensuring accident investigation is completed.

It is imperative that the scene of the accident is isolated to facilitate investigation. It is important that information relating to any accident or incident is collected as soon as possible following the event. The following is a list of evidence that will be considered. This list is by no means exhaustive.

- Witness statements.
- Photographs.
- Sketches.
- CCTV data.

- Damaged equipment.
- Maintenance records.
- Previous accident reports.
- Training records.

The main purpose of accident investigation is to establish events leading up to the accident and/or any underlying circumstances that may have contributed to the occurrence. Ultimately the evidence will be used, and information evaluated to prevent reoccurrence.

The depth of the investigation will depend on the nature and severity of the accident. Where necessary other parties will become involved with the investigation.

If we require advice or assistance with this task we will liaise with our health and safety service provider Wirehouse Employer Services Limited.

Accident Reporting

We acknowledge our duty as stipulated by the Reporting of Injuries Diseases and Dangerous Occurrences Regulations (RIDDOR). We have suitable arrangements in place for all accidents and incidents to be reported. The Directors and Managers will ensure that all employees understand the basic requirements for accident and incident reporting and know how to report such an event and are encouraged and monitored to ensure this is done.

Any employee injured whilst at work are instructed to report and record the event. An accident book is kept and managed by the first aiders. Information referring to what needs reporting can be found at the start of the accident book. If an employee is in any doubt, they are to seek advice.

Each page is perforated enabling the record to be removed once completed. The person completing the report is to enter all relevant details in the required boxes then remove the page and return it to the nominated manager.

The Directors are responsible for complying with RIDDOR and reporting any relevant incidents, within 10 days of a specified or major incident occurring, 15 for over 7 days incidents. The list of reportable injuries, dangerous occurrences and diseases is lengthy and if any doubt exists regarding these procedures, we will contact our health and safety service provider for advice.

All reports will be treated with strict confidence and their security managed accordingly. If disclosure is necessary to authorised parties, this we will monitor and control.

All incidents can be reported online but a telephone service is also provided for reporting fatal and specified injuries only - call the Incident Contact Centre on 0345 300 9923 (opening hours Monday to Friday 8.30 am to 5 pm).

The Health and Safety Executive and the Local Authority Enforcement officers are not an emergency service.

More information on when, and how, to report very serious or dangerous incidents, can be found by visiting the HSE at <u>www.hse.gov.uk/riddor/report.htm</u>. If we want to report less serious incidents out of normal working hours, we can always complete an online form.

There is no longer a paper form for RIDDOR reporting, since the online system is the preferred reporting mechanism.

Aggressive Behaviour

It is possible that our employees will experience aggressive or violent behaviour. Such behaviour can result in injuries if not dealt with correctly. We have a duty for the safety and health of employees. Where necessary, we will provide employees with the necessary training to manage aggressive or violent situations.

Training will involve teaching employees to understand simple warning signs or "triggers" to help avoid aggressive behaviour. The term "trigger" is used to describe a situation that causes aggression such as making a person wait for an excessive time for something.

The key is to avoid aggressive or violent behaviour however we will ensure that employees have the competence to manage such situations.

If an employee has been harmed because of aggressive behaviour this is to be reported to the Directors and Managers and recorded in the accident book.

Alcohol and Drug Abuse

Alcohol and drug abuse have serious implications for users and for their work, particularly with machinery. Employees who are under the influence of alcohol and drugs can seriously affect their judgement and abilities whilst driving or carrying out their work activities.

Employees are encouraged to seek assistance in complete confidence from their manager if they believe that they have a problem with alcohol, drugs or other substances.

Managers are required to make a note of employees who show symptoms of alcohol or other intoxication when at work. These symptoms include:

- Smell of alcohol.
- Slurred speech.
- Unusual lack of coordination.
- Changes in behaviour, particularly aggressiveness.

No alcohol/or drugs are to be consumed on the premises unless they are prescription drugs from the employee's doctor. Employees are instructed to check with their doctor or pharmacist that the prescription drugs that they are taking will not impair their driving ability or when working with machinery.

Alcohol may only be consumed on our premises when authorised by the Managing Director.

Anyone found taking non-prescribed drugs on our premises is guilty of gross misconduct and will be disciplined accordingly.

Anyone found taking alcohol on our premises without prior authorisation is guilty of gross misconduct and will be disciplined accordingly.

Anyone found to be intoxicated by alcohol or drugs, appear to have been drinking or smell of alcohol on our premises, will be removed, deemed guilty of gross misconduct and disciplined accordingly.

Asbestos in our Premise

There are no health risks to people working in our premise, so long as any presumed asbestos containing materials (ACMs) remain in good condition and are not disturbed. However, if the materials are abraded, drilled or worked on with power tools the dust generated may contain asbestos fibres and there will be risks to anybody exposed. To ensure that risks from ACMs are reduced to the lowest reasonable level we will operate the following procedures:

- We will not allow work on a known ACM.
- An Asbestos Register listing the locations and conditions of all known and presumed ACMs will be kept.
- The Asbestos Register will be brought to the attention of any person who might disturb or work on or near to a known or presumed ACM.
- Before any work near to a known or presumed ACM can create risk, therefore an assessment will be carried out and a method statement written. We may refer the issue to our safety advisors. The risk assessment and method statement will identify how the work will be carried out without exposing any person to risks from asbestos fibres. Where necessary, arrangements will be made for additional samples to be taken and analysed.
- The persons who will be doing the work will receive suitable training. They will be informed about the hazards and the precautions they need to take to ensure their health and safety.

Any employee observing damage to any suspected Asbestos Containing Materials is instructed to report this to the Directors and Managers

If during work a person encounters a material that may contain asbestos and were not informed about it before work started, they are instructed to immediately stop work and take advice from the Directors. Work will not be allowed to recommence until the material has been identified and a safe system of work agreed.

Assessing Risks

We must deal with risk in every part of our lives; however, the acceptability of risk relates to the standards adopted by each person, the company, our stakeholders and the regulatory authorities. Essentially, risks that are acceptable are ones where no additional control measures may be necessary.

It is important that we identify and deal with 'significant risks' rather than trivial issues and concentrate on those that might cause 'foreseeable' harm or damage. Remember, not everyone will initially appreciate how they can be harmed, and everyone will have different opinions as to what constitutes 'safe' behaviour. It is therefore necessary for us to determine what is acceptable and what controls are required to be implemented to ensure a safe working environment and compliance with regulatory standards.

A risk management programme forms the basis of our Health and Safety Management System.

We will ensure that risk assessments are completed for significant activities. Some employees will also have a significant part to play in the writing, communicating and reviewing of assessments and will be given suitable training to do this effectively.

We have identified the key areas where assessments are required and outlined the main controls required to be in place. These can only be written as 'suitable and sufficient' assessments with the input of competent employees involved in the tasks.

We will ensure that:

- Assessments are carried out and records are kept.
- Control measures are introduced because of assessments and that they are implemented and followed with the most significant hazards having the greatest priority for action.
- Employees are informed of the relevant results and provided with necessary training.
- Any significant changes, injuries or change in legislation or guidance leads to a review of relevant assessments.
- Assessments are regularly monitored and reviewed, and a schedule established.
- Suitable information, instruction and training will be provided to all persons involved in the risk assessment process to ensure a suitable level of competence.

Wirehouse Employer Services has provided us with further guidance notes about risk assessment, these can be found within the online portal system - Guardian and they include:

- An explanation of terminology around risk assessments.
- Examples of some common hazards.
- Guidance on how to complete an assessment.
- Forms ready for use.

Some examples of key assessments required include:

- A fire risk assessment.
- Hazardous substances.
- Display screen working assessments.
- Occupational stress.
- Manual handling.

Others will be completed as and when required for example:

- New and expectant mothers.
- Under 18-year-olds.
- Lone working.
- Back to work situations.

A risk assessment involves identifying the hazards present in the workplace or arising out of any work activity and evaluating the extent of the risk involved to employees and others, considering the number and type of people exposed along with the duration and frequency of the exposure and the effectiveness of existing precautions.

A hazard is something with a potential to cause harm.

A risk is the combination of the likelihood of a hazardous event occurring and the consequence of the event.

Assessments can involve a quantitative evaluation of risk using numbers, e.g. 1-5 or 1-10, or a qualitative evaluation by using 'high, medium or low'. Some situations simply record a hazard and a control measure. There is no one correct method as to how to document assessments.

The Management of Health and Safety Regulations require that risk assessments be 'suitable and sufficient' in that they should identify all the significant hazards present within the business and its activities and that they should be proportionate to the risk. The assessment should cover all risks that are reasonably foreseeable.

The key to completing an assessment is therefore to be thorough by:

- Ensuring that we are properly trained and experienced to understand the hazards and activity being assessed.
- Involving colleagues and people familiar with the task, we recognise this is the best way of understanding the perception of risk.
- Ensuring employees familiarise themselves with our Health and Safety Management System, legislation, and guidance.
- Considering relevant inspections, audits and any historical accidents or incidents.
- Considering different times of the day and environmental conditions.
- Ensuring that we consider all the potential hazards and all the way that people might be harmed.
- Using the specified forms provided along with the preferred evaluation method for calculating risk.

If we feel that we are out of our depth – we will ask our consultants for help.

This guidance follows the Health and Safety Executive's own information outlined in the guidance note 'INDG163'. These are the instructions to follow when we complete an assessment:

STEP 1 – Identify the hazards.

We will look for hazards by walking around the workplace. List the hazards that could reasonably be expected to cause harm. Ask for the opinion of employees as they may have noticed things that are not immediately obvious to us. Consider all the various tasks undertaken by the business and consider the different locations where they occur. The most significant hazardous activities may not be immediately identified.

STEP 2 – Identify who may be harmed and how.

We will list groups of people and individuals who may be affected by the hazards e.g.:

- Employees.
- Contractors on the premises.
- Visitors.
- New and expectant mothers.
- Volunteers.
- Unauthorised persons.

We will pay attention to vulnerable persons, e.g. those with disabilities, employees who are pregnant or who have recently returned to work after having a baby, inexperienced employees, young persons under 18 years and children.

We will think about how they might be harmed; it is our duty to explain this to those exposed 'in a way they can understand'. We will consider different types of hazards, such as:

- Mechanical.
- Physical.
- Ergonomic.
- Physiological.
- Transport.
- Access.
- Hazardous substances.
- Fire, smoke and explosions.
- Particles, fumes, and dust.
- Biological.
- Lifting and handling.
- Environmental factors; lighting, temperature, etc.
- The individual.
- Organisational factors.
- Electrical.

This list is not exhaustive but indicates the detail required. The individual has a huge impact on the overall risk. We will consider their level of training, attitude, work rate and tendency to work in an unsafe manner.

STEP 3 – Evaluate risk and decide on precautions.

We will evaluate the risks arising from the hazards and decide whether existing precautions are adequate or if more needs to be done. When evaluating the risk, we will consider the chance of harm occurring (i.e. the likelihood), the severity (or consequence), the number of people affected and if relevant, the frequency.

Even after all precautions have been taken a residual risk is likely to remain. We will ensure the precautions in place meet regulatory requirements and best practice and that we have reduced the risk 'as far as is reasonably practicable'.

Where additional controls or further action are necessary to reduce the risk, we will decide what more could reasonably be done by adopting a hierarchical approach along the following principles:

- Eliminate the hazard.
- Reduce the hazard.
- Prevent contact with the hazard.
- Introduce a safe system of work.
- Increased supervision.
- Provide personal protective equipment.



STEP 4 – Record findings and implement them

Once the level of risk has been determined and the controls have been agreed, an action plan will be drawn up with timescales for implementation of the control measures.

The assessment will be documented since these provide evidence that something has been done. We will keep old assessments for future reference. We will communicate the findings to employees involved in activities and record this on a training matrix. We will then observe activities periodically to ensure that the control measures have been implemented and are being followed.

Information on assessments may also be required to be given to contractors, new starters, to employees changing roles or as part of on-going or developmental training. Records will be kept.

STEP 5 – Review the assessment and update it if necessary. A review will be required following:

- The results of monitoring (e.g. ill-health, accidents, audits) where results are adversely not as expected.
- A change of process, work methods, shifts or materials.
- A change of personnel.
- Changes in legislation or best practice.
- Introduction of new plant or machinery.
- Passage of time as set out in the review schedule.

Completion of risk assessments and the information collated because of this process can only be of benefit if communicated to the people who are likely to be affected by the hazards.

We will communicate the findings of risk assessments using the following methods:

- Induction we will make employees aware of our hazards and control measures during the induction process.
- Availability of information copies of risk assessments are readily available for all employees to read.
- Training assessments and control measures to manage risk will be communicated as part of on-going training.
- Contractors and visitors will be made aware of any hazards they are likely to encounter whilst at our premises prior to commencing work.

Review

All risk assessments will be subject to periodic review with a formal review taking place at least annually. Any changes will be communicated to those affected. Competent persons will be tasked with conducting the review.

Note:

Wirehouse Employer Services have provided us with guidance notes about risk assessment, these include:

- Example copies of risk assessments for common hazards.
- Forms ready for use.

Child Protection

The development, safety and welfare of children are of utmost importance to us and we will ensure that we uphold those values.

Our services will protect children from the risk of harm, and we have adopted the Child Protection Procedures produced by Ofsted. Please see Plan B Child Protection and Safeguarding policy

We will:

- Be alert to potential indicators of abuse or neglect.
- Be alert to the risks which individual abusers, or potential abusers, may pose to children.
- Share and help to analyse information so that an informed assessment can be made of the child's needs and circumstances.
- Contribute to whatever actions are needed to safeguard the child and promote his/her welfare.
- Carry out risk assessments to identify areas where children could be harmed and to implement control measures to protect children from harm.
- Regularly review the outcomes for the child against specific shared objectives; and
- Work cooperatively with parents/guardians unless this is inconsistent with the need to ensure the child's safety.

Civil Claims

We acknowledge that employees, visitors, and contractors who may be affected by our activities have the right to make claims for compensation, where they consider that an injury is the result of negligence on our part. Such claims will be dealt with on our behalf by our Employers' and Public Liability insurer.

Our insurer requires us to forward them any letters from a solicitor, alleging negligence on our part, within 21 days of receipt and providing evidence in our defence. The insurer then has 90 days to respond to the claimant's solicitor. To enable us and our insurer to comply with the requirements of the 'fast track procedure', the following procedures are to be followed:

- All incidents are to be recorded, investigated and, where necessary, under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations, reported to the enforcing authorities.
- Any person receiving a letter from a solicitor must forward this immediately to the Directors.
- The Directors will, unless they instruct someone else to act on their behalf, forward the solicitor's letter to our insurer along with any evidence in our defence.
- Direct correspondence with the claimant and their solicitor is strictly forbidden, as this may prejudice our defence.
- All correspondence relating to the claim must be forwarded to The Directors immediately following receipt.

It is our responsibility to provide evidence in defence. Therefore, the person responsible for investigating incidents is responsible for collating an 'Evidence File' for all reportable injuries and incidents and any other accidents where a claim is foreseeable. We may take a commercial view on minor accidents, balancing the possibility of a claim being brought against the cost of accident investigation.

Evidence may take the form of the following documents; however, this is not an exhaustive list:

- Entry in the accident book.
- Statements from the injured person(s), witnesses and first aider. These should be signed and dated and contain only statements of fact not supposition.
- Copy of the accident/incident investigation report, with any photographs and diagrams.
- Pre- and post-accident risk assessments.
- A copy of any written safety instructions given to the injured person(s).
- A record of any personal protective equipment issued to the injured person(s).
- Copies of any test certificates and/or records of maintenance and inspection of any equipment involved in the incident.
- Any disciplinary evidence relating to the occurrence.
- Copy of any statutory reporting document forwarded to the Enforcing Authority.

• Copy of any correspondence from the enforcing authority relating to the incident. No evidence may be sent to our insurers without the absolute permission of the Directors.

A claim may be brought by an employee whether the accident has been recorded in the accident book or whether he/she has taken time off work as a result.

Contractors

We are committed to ensuring the health, safety and welfare of any contractor carrying out work. To protect contractors so far as is reasonable it is our responsibility to make known to contractors any hazards that have been identified and may affect such persons. We will ensure that our control measures are communicated, understood and followed to prevent harm.

The person arranging work by contractors is responsible for communicating these rules:

- Fire safety arrangements.
- First aid facilities.
- Welfare arrangements and facilities.
- Details of our policies and procedures relative to any work taking place on our premises.
- Any permit to work system in operation or required.

Before contractors arrive, the Directors are responsible for communicating with contractors. This includes:

- Personal protective equipment.
- Vehicle movement.

Under the Health and Safety at Work etc Act we have a duty to protect our employees and visitors. We will ensure that by having contractors working that all risks have been assessed. We will produce a risk assessment for the proposed work that the contractors are undertaking and put in place control measures to reduce the risk to a safe and acceptable level.

When appointing contractors, we will confirm their competencies prior to any work commencing. We will select contractors based on their health and safety performance and competence for the required work.

We will obtain from the contractor before works are carried out:

- Their health and safety policy which will include their risk assessments, training and certification.
- A copy of their insurance certificate.
- Evidence of skills, knowledge, and experience; (membership of professional bodies and/or continuing professional development).
- Method statements.

We will then review the information that they have supplied us with to determine if they have planned the work carefully and considered all aspects of safety.

When the work is being carried out by the contractors, we will ensure that we monitor their work to ensure that they are working to a safe system of work and to the standard as agreed. If necessary, risk assessments will be reviewed if changes occur; accidents or incidents arise and changes to the workplace.

Contractors are responsible for using the controls described in the risk assessment to reduce risk. Any tools and equipment used by contractors are to be suitable for purpose, well maintained and deemed safe for use by a competent person. Tools, equipment, and material are to be managed by the contractor always so as not to create a hazard. Dangerous tools and equipment are not to be left unattended.

Dermatitis

Our aim is to prevent or control the risks to employees from Dermatitis that they may develop during their work. Dermatitis is a skin condition usually caused by contact with something that irritates the skin or causes an allergic reaction. Contact Dermatitis affects mainly the hands, but other parts of the body can also be affected. Dermatitis can be caused by:

- Wet work due to repeated and prolonged contact with water, e.g. by hand washing more than 20 times or having wet hands for more than 2 hours during a shift.
- Chemical agents, e.g. through contact with chemicals, including by direct contact, splashes, contaminated work surfaces and tools, airborne particles settling on the skin.
- Biological agents, e.g. through contact with plants, bacteria, spores, moulds, fungi.
- Physical agents, e.g. by vibration, radiation or low humidity from air conditioning.
- Mechanical agents, e.g. by abrasion.

The main categories relating to work-related Contact Dermatitis are classified as:

- Irritant Contact Dermatitis: mainly caused by chemical and physical irritants and is the most common form of Contact Dermatitis. Common chemical irritants include solvents, soaps, detergents, latex, cosmetics, metalworking fluids, oils and alkalis.
- Allergic Contact Dermatitis: common allergens include, UV cured printing inks, adhesives, wet cement, some plants, nickel, and chromium which can cause an allergic reaction, hours or days after contact. In rare cases a severe reaction can occur, known as an 'anaphylactic shock.'
- Photo Contact Dermatitis: is a reaction that develops where chemicals are applied to the skin, e.g. sunscreens, fragrances, creams, insecticides, disinfectants.

Symptoms of dermatitis generally include a localised rash and/or irritation of the skin and can develop into flaking, scaling, cracking, bleeding, swelling and blistering which can take days or even weeks to heal. To achieve these objectives the following arrangements will be followed:

- We will identify all substances likely to generate the risk of dermatitis and those persons who are at risk of work-related developing dermatitis.
- Where reasonably practicable, eliminate the use of substances that are likely to cause dermatitis.
- Where relevant, replace substances likely to cause dermatitis with less harmful Substances.
- Establish control measures and safe systems of work to prevent and/or minimise skin contact with hazardous substances.
- Provide suitable personal protective equipment (PPE), skin care products and adequate washing facilities.
- Provide suitable personal protective equipment storage and disposal facilities.
- Encourage workers to carry out regular skin checks to identify signs of dermatitis.
- Introduce health surveillance for all workers likely to be at risk of developing dermatitis.
- Provide workers with information, instruction, and training in relation to hazardous substances, use of PPE and skin care products.
- Consult with workers and their representatives in relation to skin care, skin care products and personal protective equipment.
- Record and investigate any diagnosed cases of dermatitis and follow RIDDOR reporting procedures, where appropriate.

Disability Compliance

Where we employ persons that are disabled, or where existing employees have become disabled, we have a duty to make reasonable adjustments so far as is reasonable, for example layout, to protect the health, safety, and welfare of the employee.

To ensure the health, safety, and welfare of employees with disabilities we will review our existing risk assessments to make sure that they reflect the disability of the employee. If necessary, we will carry out an individual risk assessment of the employee. We will consider that employees may not be able to assist in emergency situations.

Where it has been identified that employees have problems with their mobility, we will develop a personal emergency evacuation plan to cover their escape safely in the event of an evacuation. The personal emergency evacuation plan will be reviewed at frequent levels to reflect any changes in the employee's health condition. Equally, where employees must carry out lone working as part of their work, we will review the risk assessment to establish for example if a buddy system can be incorporated.

In cases where employees are temporarily disabled, such as a broken limb, adaptations may not be reasonably practicable. In these circumstances, we will offer the employee alternative work or if there is no alternative work to offer the employee, then we may consider excluding them from the workplace temporarily.

Display Screen Equipment

We will take all reasonable steps to secure the health and safety of those who work with display screen equipment (DSE).

We acknowledge that health and safety hazards may arise from the use of this equipment. It is our intention to ensure that any risks are reduced to a minimum. Whilst it is generally recognised that the use of DSE can be undertaken without undue risks to health, it is appreciated that some employees may have genuine reservations and concerns. We will give information and training to enable a fuller understanding of these issues.

We will:

- Carry out an assessment, or provide information for self-assessment of each workstation, considering the DSE, the furniture, the working environment and the worker.
- Take all necessary measures to remedy any risks found because of the assessment.
- Take steps to incorporate changes of tasks within the working day, to prevent intensive periods of on-screen activity.
- Review software to ensure suitability for the task.
- Arrange for the provision of eye and eyesight tests at regular intervals and where a visual problem is experienced.
- Contribute to any corrective appliances (glasses or contact lenses) where required specifically for working with DSE.
- Advise you, and all persons applying for work with DSE, of the risks to health and how these are to be avoided.

Where a matter related to health and safety in the use of DSE is raised, we will:

- Take all necessary steps to investigate the circumstances.
- Take corrective measures where appropriate.
- Advise employees of actions taken.

We will give sufficient information, instruction, and training as is necessary to ensure the health and safety of workers who use DSE. This provision also applies to persons not in direct employment, such as temporary employees and contractors.

The Directors are responsible for users of display screen equipment and will provide appropriate information.

Employees who are classified as a display screen 'user', they are entitled to an eye and eyesight test at intervals recommended by the person who carried out the previous test. All tests are specifically for users of DSE and are to be arranged through us.

Where employees experience visual difficulties and have reason to believe that these may be caused by working with DSE, we will offer an eye and eyesight test.

The costs of eye and eyesight tests will be met by us if testing has been arranged through us. Where employees obtain a test independently and without our knowledge, even if the test is specifically related to display screen use, we shall not be responsible for the costs incurred.

Where corrective lenses are found to be necessary, specifically for the use of DSE, we will pay towards the cost of the corrective lens. If employees prefer enhanced frames they will pay any balance of the cost. Evidence of purchase will be requested.

The purpose of a break from DSE work is to prevent the onset of fatigue. To achieve this objective, we will seek to incorporate changes of activity into the working day. Whilst on a break from DSE employees are recommended to avoid other screens and phones.

Employees are advised to take ten-minute breaks from DSE work every hour. Where possible, users will be given the discretion to decide the timing and extent of off- screen tasks. If employees know that their DSE workload does not permit adequate breaks they are to bring this to the attention of their Line Manager.

Employees are asked to undertake a self-assessment of their workplace using a simple-to-follow format. Most people do not have any issues using the equipment and so assessments are usually only repeated after two years, after office moves or other significant changes.

If employees require any specific assistance this will be considered in the assessment.

Electrical Safety

Electricity can kill, and the risk is often underestimated as it cannot be seen. It can cause burns, shock, fire and fatalities. We acknowledge our legal duties and will take the necessary precautions to prevent any accidents or incidents occurring.

Fixed electrical installations include the wiring, electrical sockets, switches, isolation boxes, fuses etc. that are installed in our building. Damage to any fixed installation is to be reported and a repair arranged with minimum delay. Remedial action will be required to be taken to restrict access use of damaged equipment until a repair can be arranged. The completion of any electrical work is only be conducted by a competent electrical engineer.

We will ensure fixed electrical installations are safe and we will accomplish this by ensuring installations, modifications, maintenance, inspection and testing are completed following relevant procedures established by the Institution of Engineering and Technology (IET) and their regulations.

We understand preventative maintenance is the key to help minimise accidents. We have in place an internal periodic monitoring system to identify electrical faults; all faults are to be reported, and the necessary action arranged for repair.

We will arrange for a competent electrical engineer to inspect and test our electrical installations at a period of every 5 years or less. Documentation will be kept reflecting the findings of this visit.

We understand preventative maintenance is the key to help minimise accidents. We have in place an internal periodic monitoring system to identify electrical faults; all faults must be reported, and the necessary action arranged for repair.

A portable appliance is generally any electrical equipment that has a plug. These are to be treated with the same respect as fixed installations. Plugs can get damaged, wires and pins can become loose, and leads can get split or flattened increasing the risk of a shock, burn or fire. Plugs that get hot, smell or spark are to be put out of use and a repair arranged.

To ensure appliances are safe to use we will ensure:

- A register of all equipment is maintained, this includes any home working equipment, mobile phone chargers, extension leads and any personal items that are permitted to be used at work e.g. radios.
- Periodic internal monitoring checks will be conducted that will include a review of electrical appliances.
- All employees are instructed to visually check equipment before use and report any defects.
- Portable appliance testing will be organised at appropriate intervals, the frequency of inspection and testing will depend on the equipment and the environment in which it is used.
- All inspections, testing, maintenance, and repairs will be conducted by a suitably competent person.
- The use of extension leads will be monitored and 'daisy chaining' will be avoided.

Any electrical or general contractor engaged to undertake work will be requested to prove competence and testing arrangements for their own equipment.

Under no circumstances is any employee to undertake any electrical work unless they are authorised and qualified to do so.

The Health and Safety Executive suggests a testing frequency for portable appliances in the guidance document HSG107 as follows.

Table 1 Suggested initial maintenance intervals

Type of business		User checks	Formal visual inspection	Combined inspection and test
Equipment hire		N/A	Before issue/after return	Before issue
Battery operated equipment (less than 40 V)		No	No	No
Extra low voltage (less than 50 V ac), telephone equipment, low-voltage desk lights		No	No	No
Construction	110V equipment	Yes, weekly	Yes, monthly	Yes, before first use on site then 3-monthly
	230V equipment	Yes, daily/every shift	Yes, weekly	Yes, before first use on site then monthly
	Fixed RCDs	Yes, daily/every shift	Yes, weekly	Yes, before first use on site, then 3-monthly (portable RCDs – monthly)
	Equipment site offices	Yes, monthly	Yes, 6-monthly	Yes, before first use on site then yearly
Heavy industrial/high risk of equipment damage (not construction)		Yes, daily	Yes, weekly	Yes, 6–12 months
Light industrial		Yes	Yes, before initial use then 6-monthly	Yes, 6–12 months
Office information technology rarely moved, eg desktop computers, photocopiers, fax machines		No	Yes, 2–4 years	No if double insulated, otherwise up to 5 years
Double insulated (Class II) equipment moved occasionally (not hand-held), eg fans, table lamps		No	2-4 years	No
Hand-held, double insulated (Class II) equipment, eg some floor cleaners, some kitchen equipment		Yes	Yes, 6 months – 1 year	No
Earthed (Class I) equipment, eg electric kettles, some floor cleaners		Yes	Yes, 6 months – 1 year	Yes, 1–2 years
Cables, leads and plugs connected to Class I equipment, extension leads and battery charging equipment		Yes	Yes, 6 months – 4 years depending on type of equipment it is connected to	Yes, 1–5 years depending on the equipment it is connected to

Fatigue in the Workplace

Fatigue is more than feeling tired and drowsy. In a work context, fatigue is a state of mental and/or physical exhaustion which reduces a person's ability to perform work safely and effectively.

It can occur because of prolonged mental or physical activity, sleep loss and/or disruption of the internal body clock.

Fatigue can be caused by factors which may be work related, non-work related or a combination of both and can accumulate over time.

We have introduced 11 tips to reduce the risk of fatigue in our workplace. We will use the following tips to reduce the likelihood of fatigue becoming a health and safety concern:

- Consult our workers about issues surrounding fatigue hazards and make sure they feel comfortable to share their concerns.
- Design jobs around controlling the mental and physical demands associated with the job, ensuring adequate personnel and resources to do the job without placing excessive demands on workers.
- Placing strong importance on job rotation and task variation.
- Leave enough time between tasks for workers to have the rest time they require to recuperate before their next task.
- Consider our workers' working environment, e.g. extreme temperatures, shelter for those outdoors, facilities, lighting etc.
- Educate our workers on fatigue management.
- Allow our workers sufficient rest periods and breaks during their shifts.
- Take an active role in encouraging our workers to take annual leave rather than accumulate it. Reminding them that leave is an important time to recuperate from stress and fatigue.
- Ensuring adequate amenities are provided, e.g. plenty of water is available.
- Ensuring our workers feel able to take advantage of their sick leave entitlement when they need it. (We will not create a workplace where our workers feel the need to attend work when they are ill. A worker believing the workplace cannot function without them or that their job is at risk if they do not attend can cause this.
- We will design work to reduce/avoid:
 - a. Overtime or encouraging extended.

Once we have identified high-risk workers and implemented measures to reduce the risk. We will monitor and supervise as appropriate. We will remain vigilant over our workplace and our workers and try to pick up on signs that a worker's performance may not be at its peak.

Fire Safety

Fire causes a significant risk to us, and all the persons affected by our activities. We acknowledge our duties as described by the Regulatory Reform Fire Safety Order and intend to fully comply with our duties.

Our fire risk is continually assessed, and a formal review arranged and documented at least annually. A Fire Risk Assessment is completed for each work area and fire training will be undertaken by all employees.

We will ensure that fire procedures are documented for each activity location and explained to employees.

Action will be taken to address the outcome and recommendations made because of any formal assessment. We will reduce the level of risk to prevent any likelihood of a fire occurring or harm to anyone because of a fire starting.

All employees have a duty to prevent fires. Information and training will be provided to help employees understand fire safety precautions and our procedures.

Designated employees have been assigned duties to help manage our fire safety arrangements. Our aim is to:

- Maintain good standards of housekeeping to minimise fire risk.
- Provide fire safety training for employees.
- Provide adequate and suitable fire information for visitors.
- Provide and maintain a suitable means of detection.
- Provide and maintain a suitable means of alarm system.
- Establish fire and emergency fire evacuation instructions and communicate these to employees and others and display instructions in suitable locations.
- Designate fire escape routes and exits.
- Identify a suitable location for assembly following evacuation.
- Provide and maintain suitable portable firefighting equipment.
- Keep records of inspections, tests, maintenance, evacuation drills and any other key fire safety issues applicable to us.
- Ensure visitors are informed of our fire safety arrangements.
- Take into consideration the risk from and to other businesses adjacent to our building or place of work and consult with such persons to reduce risk.

Our procedures take into consideration the needs of persons with disabilities, impaired senses, or people unfamiliar with the layout of our building.

We have responsibilities for fire safety and are responsible for ensuring any points identified because of completing the fire risk assessment are addressed. Our fire safety policy is prepared to ensure the safety of anyone at our premises.

The Regulatory Reform Fire Safety Order places specific duties on us. In the interest of fire safety, we must comply with our duties.

We will ensure our fire safety information is brought to the attention and observed by employees, contractors, and visitors. Every employee is to participate in fire safety training.

We rely on employees to help maintain our fire safety standards. Employees are to report any unsafe condition or damaged/missing equipment.

Our fire safety arrangements are continuously assessed to ensure these are satisfactory. Anything likely to have an adverse effect on our fire safety arrangements are to be reported and/or rectified immediately.

Automatic Fire Detection – (AFD)

The purpose of an audible alarm system is to warn all the occupants of a potential fire emergency. The simplest type of alarm is a shout, whistle or bell which is easy to arrange and low cost. The serious limitations of this are that it only works when someone is there to operate it, the alarm is only heard locally and the bell or whistle can be lost or removed.

The best alarm systems that can be designed and installed have:

- An electrical supply, independent of the building.
- A battery back up on a trickle charge from the mains.
- Hard wired cables protected from heat and potential damage.
- Call points to operate the alarm (red break glass boxes).
- An audible and visual signal, distinctive from any other sound in the building.
- A central panel or indicator board.

To classify the system as an automatic fire detection system it requires smoke or heat detectors that activate the system independently of people using the manual call points, providing the most reliable and earliest warning of a fire emergency to enable safe evacuation and to limit property damage.

The type of detector used is extremely significant and employees are to take advice from a competent person, usually the alarm installer who will follow and interpret the main guidance as set out in the guidance document 'BS5839'. This will usually be a combination of different types of smoke and heat detectors.

The number, type and positioning of detectors as well as the number and location of sounders, how loud they must be and how far apart they are all prescribed in the guidance.

We will consider additional sounders, strobe lights or vibrating alarms if we are responsible for permanent employees or vulnerable people who may not be notified by the existing alarms. If we receive visitors who have a disability we will make provision for their safe evacuation in an emergency. This could involve for example a pendent alarm or a buddy system.

Automatic systems are installed where the fire detection system is intended to protect life. This system is categorised as type 'L' and graded L1-5, L1 being total coverage in all parts of the building. An automatic system that is designed to protect property is

categorised as type 'P' and is rated P1-2. The system will be clearly identified and be suitable for the type of operation we have. The best advice is to consult our alarm installer to ensure this is achieved and we will comply with all aspects of the guidance document 'BS5839' which governs alarm installations.

Our system will be zoned, and employees will be trained to recognise the difference between and the importance of fire zones. Dividing the building into zones aids the quick identification of a fire and although these will follow compartment walls they may not have to be in line with the physical features of the building. There will be a list or map of the zones by the fire panel to help identify each area quickly and easily.

Alarm systems are either single-stage or two-stage systems. A single stage alarm will activate in the whole building as soon as a fire is detected. A two-stage system notifies of an alarm activation by an intermittent or local alarm, giving employees a chance to check the zone for a fire before either silencing or activating a full alarm. Fire training will reflect the type of alarm system we have, and all employees will be trained to react in accordance with the type of alarm installed.

False alarms influence how people behave and react to alarms and can pose a significant problem for wardens and those managing fire safety arrangements. All false alarms will be investigated and recorded. Common causes can be:

- Insects.
- Steam.
- Cooking.
- Dust.
- Hot work.
- Smoking.

If alarms are continually activated, then we will consult with our alarm company to decide what action to take, including changing the type of detectors. The Fire and Rescue service can act against us if multiple alarm calls are answered and of course may cause the delay of the service to a real emergency elsewhere.

The testing of all parts of the AFD system is a legal requirement and requires a planned and preventative maintenance schedule. If the system is directly connected to an alarm service or centre, then the testing sequence will be documented, and employees are required to undergo training. This includes isolating the system or taking it 'off-line' for the duration of the test and reactivating it after the test is completed.

A suitable schedule of testing and maintenance includes.

Daily Inspection				
Checking the fire panel is in normal operation				
Ensuring there is a monitored direct line				
Weekly Inspection				
Activating system from a call point in rotation (testing each unit over 13 weeks)				
Recording the activation in the fire log				
Visually inspecting the batteries				
Quarterly Inspection – Usually by Service Engineer				
Signing off any defects, checking the batteries and connections				
If applicable testing secondary batteries				
Checking alarm functions and control panel				
Checking all call points and detector positions are unobstructed and unaffected by				
structural changes				
Annual Inspection – By Qualified Person				
Repeating all quarterly tests				
Operating each detector				
Visually checking the cables and fittings				
Three Yearly				
Ensuring a service test is undertaken with regards to the regulations for Electrical				
Installations				
Following A Fire				
Testing each detector that may have been affected by the fire				

All these events will be recorded in the fire log.

First Aid

First aid at work covers the arrangements that need to be made to ensure the initial management of any injury or illness suffered at work. It does not include giving tablets or medicines to treat illness. The regulations do not prevent persons that are specially trained to act beyond the initial management stage from doing so.

We will provide or ensure that they are provided; such equipment and facilities that are adequate and appropriate in the circumstances for enabling first aid to be rendered to our employees if they are injured or become ill at work.

We will also provide, or ensure that there is provided, such a number of suitable persons as is adequate and appropriate in the circumstances for rendering first aid to our employees if they are injured or become ill at work. Such persons shall be deemed able to deliver first aid if they have undergone training, including any additional training where deemed appropriate.

Provision will also be made for appointing a person to take charge of any situation should the trained person be absent for any period.

To provide a suitable level of first aid we will:

- Nominate an employee to manage our first aid arrangements.
- Nominate and train appointed persons.
- Nominate and train sufficient persons to ensure employees receive immediate first aid attention: and / or
- Liaise with others to ensure first aid cover is available and provided by suitably qualified persons.
- Identify suitable facilities to administer first aid.
- Provide adequate and appropriate first aid equipment.
- Display notices providing information regarding first aid including where and how to obtain help.

We will assess first aid needs appropriate to the circumstances. The assessments will consider the following factors:

- The hazards and risks associated with the work. This is available from the general and specific assessments required under other health and safety regulations. Different work areas within any undertaking that may require separate assessments if the work activities vary significantly between the areas.
- The size and nature of the workforce. i.e. the number of employees, employment of young persons, disabled employees, etc.
- Accident statistics and trends. This information will be obtained from records, such as the accident book, Accident/incident report forms and records of accidents reported under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations.
- The distribution of the workforce. i.e. the size of the premises; accessibility to external emergency facilities and services.
- Contingency arrangements for covering planned and unplanned absences of trained and/or designated first-aid personnel.
- Any trainees counted as employees under the Health and Safety (Training for Employment) Regulations.

We will ensure that adequate provision is made to cover both planned and unplanned absences of first aiders. We will ensure that any trainees are considered as part of their assessment.

All first aid containers will be clearly marked with a white cross on a green background. They will contain suitable first aid materials, in sufficient quantities and nothing else. For most applications, sufficient quantities may be considered as:

- A general guidance card on first aid.
- Twenty individually wrapped sterile adhesive dressings (assorted sizes) appropriate for the environment. This may include detectable dressings for the food industry.
- Two sterile eye pads, with attachments.
- Four individually wrapped triangular bandages (preferably sterile).
- Six safety pins.
- Six medium sized individually wrapped sterile unmedicated wound dressings (approx. 12cm x 12cm).
- Two large sterile individually wrapped unmedicated wound dressings (approx.18cm x 18cm).
- One pair of disposable gloves.

Category of Risk	Number of employees at any location	Suggested number of first aid personnel
Lower Risk	Fewer Than 50	At least 1 appointed person
	50 – 100	At least 1 first aider
	More than 100	1 additional first aider for every 100 employed
Medium Risk	Fewer than 20	At least 1 appointed person
	20 - 100	At least 1 first aider for every 50 employed (or part thereof)
	More than 100	1 additional first aider for every 100 employed
Higher Risk	Fewer than 5	At least 1 appointed person
	5 – 50	At least 1 first aider
	More than 50	1 additional first aider for every 50 employed
	Where there are hazards for which additional first aid skills are necessary	In addition, at least 1 first aider trained in the specific emergency action

Suggested Numbers of First Aiders (HSE Guidance)

Appointed Persons

Where our assessment identifies that a first aider is not necessary, we will adopt the minimum requirement to appoint a person to take charge of the first aid arrangements, including looking after the equipment, facilities, securing the scene where appropriate and calling the emergency services when required.

The employee(s) nominated for management of our first aid arrangements are to ensure that:

- All facilities are clean.
- Items are well stocked.
- No equipment has passed its "use by" date.
- The accident book is kept up to date and is available.

First Aid – Mental Health

Mental health first aid is a training programme that teaches people how to help a person developing a mental health problem (including a substance use problem), experiencing a worsening of an existing mental health problem or in a mental health crisis. Like traditional first aid, mental health first aid does not teach people to treat or diagnose mental health or substance use conditions. Instead, the training teaches people how to offer initial support until appropriate professional help is received or until the crisis resolves. While first aid for physical health crises is a familiar notion in developed countries, conventional first aid training has not generally incorporated mental health problems.

Mental health first aid was developed and launched under the Department of Health: National Institute for Mental Health in England as part of a national approach to improving public mental health.

We can play a key role in improving mental health wellbeing in our workplace. Mental health problems affect one in four people at some point in their life. For example, mental health problems account for around 30 percent of sickness absence in the NHS, so we need to be aware of the different types of problems and how to deal with them.

While mental health can seem like a difficult topic to tackle, we do not need to be an expert in mental health to help others. We do, however, need to understand how to support our employees and have open constructive conversations with them.

This is where practical training can help.

Like a person's physical health struggles, mental health problems can also fluctuate so what may be minor one day could be a major problem the next day.

Our reaction should first be to listen and give them the information and support they need to plan and manage their work. We will support mental wellbeing in by:

- Encouraging open and honest communication.
- Monitoring workloads.
- Giving control over work, where possible.
- Keeping people informed of upcoming organisational or team changes.
- Knowing reasonable adjustment and phased return options.

Mental Health can be a real off-limits subject as it is sometimes seen as a challenging issue to talk about, but we do not need to be an authority on mental health to support people. However, we do have a key role to play in improving mental wellbeing.

Having open and honest conversations with people about their mental health, providing support and creating a culture of positive mental wellbeing in the team can make a big difference to how people are able to manage stress and other mental health problems.

Mental health can vary along a spectrum in a similar manner that physical health can and there are probably times when it is better than others. Mental health problems are to be supported in the same honest and consistent way that physical health problems are.

Sometimes, mental health conditions can be regarded as a disability, however it is not always black and white as to what does and does not fall into the definition of "disability". We will seek further guidance from the relevant bodies depending on the specifics of each individual case. If the mental health condition is likely to be regarded as a disability, then keeping in line with the legal requirements set out in the Equality Act which includes making reasonable adjustments where appropriate.

Reasonable adjustments will be made to enable employees to remain at work, or, if they are off sick, to return to work.

Reasonable adjustments will be made to help an employee to remain at work instead of taking sickness absence or return to work earlier after a period of absence.

We will need to work with the relevant bodies and the employee to discuss possible and practical adjustments, which could include allowing time for medical appointments, reduced or modified duties, extra training, or modified equipment. Where applicable, we may also consider phased return, part time working and extra support for the first few weeks our employee is back at work.

We will discuss any adjustments fully with the employee to see if it is suitable and would enable them to do the tasks and functions, they have agreed to without exacerbating their health complaint. We will approach all our employees in the same way and discuss adjustments openly.

Other points we will bear in mind may include:

- Carrying out risk assessments for the employees' work areas.
- Altering the job to remove the most physically (or mentally) demanding work until the employee is completely assimilated back into the workplace.
- Providing access to occupational health, counselling or physiotherapy.
- The effect on the employees' pay.
- Arranging extra support in the first few weeks back.

We remember that it is important that we obtain advice from the relevant bodies when determining whether any reasonable adjustments or modifications can be made to our existing workplace and/or duties.

A risk assessment and its subsequent control measures will be carried out as appropriate. Some examples include:

- Allowing an employee time off to attend medical appointments, as we are all probably aware, these appointments can sometimes take up a significant part of the working day and this can be stressful.
- Modifying or adapting a job description to take away tasks that cause difficulty.
- Offering flexibility in working hours/patterns, i.e. reduced hours, working from home or a phased return. Taking away the pressure of "rush hour" traffic could be beneficial.
- Transfer of workplace.
- Acquiring or modifying equipment and ensuring suitable access to premises for people using wheelchairs or crutches, providing travel to and from the workplace or giving access to on-site parking.
- Social or cognitive support.
- Extra training and refresher courses.
- Providing support to overcome barriers to returning to work.

The Health Safety Executive suggests that the following work adjustments can be made to assist an employee's return to work:

- Providing new or modified equipment and tools, including IT, modified keyboards.
- Modifying workstations, furniture, movement patterns.
- Modifying instructions and manuals.
- Modifying work patterns or management systems and style to reduce pressure and give the employee more control.
- Modifying procedures for testing, assessment, and appraisal.
- Providing the employee with a mentor or 'buddy' while they regain confidence in the workplace.
- Providing supervision.
- Reallocating work within the team.
- Providing alternative work.

Mental health problems cover a range of conditions, including depression, anxiety, panic attacks, obsessive compulsive disorder, phobias, bipolar disorder (manic depression), schizophrenia, personality disorders and psychosis.

Food Hygiene

We have a legal duty under food safety legislation to ensure that the food we are serving is always safe to eat. We have in place a Food Safety Management System to help us maintain high standards of food safety and our duty to comply with legislation.

Employees are expected to understand their responsibilities and follow procedures that we have devised to meet our statutory duties. All employees involved with the handling and preparation of food will receive food safety training appropriate to their role. When employees have been trained, we will ensure that we arrange for refresher training when their food hygiene certificate has expired.

Personal hygiene is important, we will keep our food safe for consumption and free from bacteria. We request that employees:

- Report any illness.
- Keep their hands and fingernails clean. Not wear nail polish.
- Remove items of jewellery when preparing food including watches.
- Wear protective clothing and headgear.
- Tie long hair back.
- Cover cuts, broken skin etc. with blue plasters.

Employment of good practice is essential to help prove due diligence. We will prevent food becoming contaminated. The following are examples of what we must look out for to prevent debris entering the food causing the food to become spoilt.

We will ensure that:

- Machine parts, insects from fly zappers, surfaces, ceiling or wall coverings do not enter food.
- Food is stored in suitable containers.
- Cold storage facilities maintain the correct temperatures.
- Cleaning detergents and other chemicals are kept away from food.

Employees who are responsible for purchases will ensure that food is received from only reputable sources. Deliveries will be arranged where possible to arrive at a convenient time.

We will consider the following:

- All goods will be inspected before accepting the delivery. We will examine goods or samples for broken or damaged packaging, spoiling, best before/use by dates etc.
- Goods will not remain unattended for lengthy periods; they will be stored correctly at the earliest opportunity.
- Chilled goods will be stored in transit at the correct temperature to avoid spoiling.
- All orders involving chilled foods will be checked.
- Request a temperature confirmation receipt from the driver and retain this for due diligence records.
- Store immediately in suitable fridges or freezers.

Foods will be stored correctly, and storage standards and facilities maintained to avoid spoilage and unnecessary waste. Dry goods will be stored off the floor and in sealed containers.

Chilled food will remain chilled until ready for use. Periodic temperature checks will be taken and recorded to confirm fridges and freezers are maintaining the desired temperatures (below 5°C for fridges and -18°C or below for freezers).

It is important that stock is rotated to avoid spoilage and waste. We have in place a reliable system to manage stock. Employees are to understand our stock rotation system and follow our procedures.

All food is to be prepared using best practice, procedures, policies and controls. Our standards are to be continuously monitored. Anyone preparing food is to be competent or under strict supervision of a competent person. The HACCP principles are always to be applied and followed.

Bacteria multiply and spread between temperatures of 5-63°C, this is classed as the 'danger zone'. We adopt good food safety practices to avoid accumulation of bacteria.

Knives and other kitchen equipment have the potential to cause cuts, lacerations, burns and other injuries. It is important that employees take charge of and use equipment correctly and responsibly. Employees will receive training on how to use kitchen equipment. Employees must not use any machine or equipment until training has been provided and this training has been recorded.

We have a duty to provide safe wholesome food. Some of our consumers may suffer allergies. To prevent the risk of a consumer suffering an allergic reaction we will ensure that we have clear written information available to all employees to identify which foodstuffs contain the 14 allergens listed in the EU Food Information for Consumers Regulations. To reduce the risk of cross contamination with food preparation and serving, all employees are instructed to follow the documented procedures stated with the HACCP as anaphylaxis can be fatal. If they do not understand they must ask.

Cleanliness is an essential part in helping us to ensure food is safe for consumption. We have devised cleaning schedules to cover all aspects of cleaning. This includes:

- Information of what is to be cleaned.
- Details of methods, equipment, and detergents to be used with appropriate cleaning materials.
- The recommended frequency for cleaning.
- Safety precautions.

All employees are to maintain good hygiene standards to prevent pests and we will maintain the premises in good repair and condition to prevent the entry of pests.

All stock is to be regularly rotated and any food that is no longer fit for consumption is to be disposed of correctly to prevent pest activity. Any spilled liquids or food debris is to be cleaned up immediately.

Hazardous Substances

A hazardous substance can present itself as a liquid, dust, fume, gas, powder, solid or as a bacteria, virus or bodily fluid. Injury or ill health can be caused through substances absorbed through skin or eyes, ingestion, inhalation, or skin puncture.

The Control of Substances Hazardous to Health (COSHH) Regulations requires that we assess and control exposure to hazardous substances.

We acknowledge our duty and will assess the risk from exposure to employees or other persons to substances we use, store, or create.

We will do this by adopting the following course of action:

- Maintain a hazardous substances inventory sheet.
- Evaluate the risk to health of each substance.
- Decide what precautions are required to be implemented.
- Record assessments.
- Provide information and training to those who are or may be at risk.
- Decide when the assessment needs to be reviewed.

When completing the risk assessment of the substance we will consider:

- The number of people affected.
- The risk to health, especially considering pregnant and young persons.
- How to prevent exposure.
- How to reduce the frequency or duration of exposure.
- What other steps might be required to achieve a suitable control of exposure
 - e.g. information, instruction, training, personal protective equipment.

For man-made substances, the material safety data sheets (MSDS) will be filed with the hazardous substances inventory sheet and used to complete the risk assessments. For other substances, such as bodily fluids, viruses, bacteria, and dusts more detailed assessments or monitoring techniques may be required to establish the level of risk.

Some substances present a low risk if used in isolation, however if combined with other substances they can create a significant hazard. Employees are to read and understand safety information provided on the product packaging and on the material safety data sheet.

We will ensure that anyone required to undertake assessments receives suitable training and instruction and has been deemed to be competent. In certain circumstances, the risk assessment may determine that employees require expert advice and monitoring. This may include:

- Sampling or personal monitoring to determine air quality.
- Health surveillance to establish any effects on personal health.
- Engineering controls such as ventilation systems.

Wherever this is the case, a policy and procedure will be prepared and communicated to those involved.

The assessments will be reviewed regularly, the intervals between reviews will be commensurate with the potential for harm, e.g. less harmful products will be subject to a formal assessment every 2 years, others more often. Records connected with ill-health will be kept for 40 years.

Following a standard hierarchy approach to control measures, personal protective equipment (PPE) will only be used as a last resort or as a back-up measure during testing or modification of other controls. Where it is used as a control measure – the type, design and the necessary standards will be recorded in an assessment.

Where we engage contractors, similar approaches to assessment and control of exposure will be expected, for example cleaners using their own chemicals are to be responsible for completing their own risk assessments and arranging for safe storage of any chemicals left within our premises.

Storage locations for hazardous substances will be suitable and information on safe storage obtained from the data sheet. Typically, chemicals will be kept with consideration to ventilation, temperature, spillage, security arrangements, away from food production and product and unauthorised persons.

Those using hazardous substances are to be familiar with the symbols used to identify the types of hazards associated with the products. Some substances can cause serious skin problems – such as dermatitis. These are always to be reported and investigated and may be reportable as occupational diseases under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations.

Substances are never to be decanted into unmarked containers and they should be stored with suitable caps and lids.

Further information can be found on the HSE website or in 'COSHH Essentials' – INDG136.

	COSHH Guide to Hazard Symbols			
Since 2009, new international symbols have been gradually replacing the European symbols. Some of them are similar to the European symbols, but there is no single word describing the hazard. Read the hazard statement on the packaging and the afety data sheet from the supplier.				
SYMBOL	MEANING			
	Toxic/Danger Can cause death or chronic damage to health if swallowed, breathed in or absorbed by skin Do not swallow the material, allow it to come into contact with skin or breathe it.			
	Warning May cause irritation (redness, rash) or less serious toxicity. May damage the ozone layer. Keep away from skin and eyes Avoid release to the environment			
	Sensitiser/Carcinogen/Mutagen May cause serious and prolonged health effects on short or long term exposure. Do not swallow the material, allow it to come into contact with skin or breathe it			
¥_2	Aquatic Toxicity Toxic to aquatic organisms and may cause long lasting effects in the environment. Avoid release to the environment			
	Corrosive Corrosive material which may cause skin burns and permanent eye damage. May corrode metals. Avoid contact with skin and eyes Do not breathe vapours or sprays Wear protective clothing Keep away from metals			
	Flammable Flammable if exposed to ignition sources, sparks, heat. Some substances with this symbol may give off flammable gases in contact with water. Avoid ignition sources(sparks, flames, heat) Keep your distance Wear protective clothing			
(19)	Oxidiser Can burn even without air, or can intensify fire in combustible materials. Avoid ignition sources (sparks, flames, heat) Keep your distance Wear protective clothing			
	Explosive May explode if exposed to fire, heat, shock, friction. Avoid ignition sources (sparks, flames, heat) Keep your distance Wear protective clothing			
	Compressed or liquefied gas Contains gas under pressure. Gas released may be very cold. Gas container may explode if heated. Do not heat containers Avoid contact with skin and eyes			

Health Surveillance

We acknowledge that some of our activities have the potential to cause work-related illnesses. Therefore, we will take all reasonable steps to monitor our employees' health. The aim will be to detect early signs of the onset of work-related illnesses so that suitable actions can be taken to prevent illnesses developing. All employees will be requested to complete a medical questionnaire upon employment with us.

Possible work-related conditions arising from our activities include:

- Hand-Arm Vibration Syndrome (HAVS) resulting from the use of vibrating hand tools.
- Noise induced hearing loss resulting from exposure to high noise levels from machinery.
- Contact or allergic dermatitis resulting from exposure to some substances.
- Work related upper limb disorders (WRULD) resulting from the use of computing equipment.

We will give sufficient information, instruction,

and training to ensure full understanding of the hazards to health posed by the identified activities and the importance of the control measures provided. Information will also be given to others who may be affected, such as temporary employees and contractors.

We will engage the services of a competent occupational health service provider to give advice and guidance in health surveillance where necessary. The service provider will carry out regular health examinations of employees and give guidance upon symptoms to be watched for so that any industrial illness can be identified at an early stage and steps taken to cure the condition or prevent it getting worse.

We have a continuous role throughout the health surveillance process to ensure that we protect people who may be affected by our work activities.

Home Working

Working from home has many benefits, particularly in reducing overheads, eliminating the need for commuting, offering flexibility in working hours and allowing employees to work when otherwise they might not be able. Home working can be everything from computer-based work (commonly referred to as 'teleworking') to assembling and packaging goods.

Home workers are subject to the same health and safety requirements as workers based on company premises and will be managed accordingly.

We will:

- Ensure that appropriate risk assessments are completed.
- Ensure that risk assessments are reviewed annually.
- Ensure home workers are provided with suitable induction training on commencement of employment.
- Ensure appropriate equipment is provided for the home worker's health safety and welfare.
- Ensure all equipment that is provided for use in the employee's home is properly installed and tested.
- Arrange for the maintenance of all electrical equipment supplied for use in the employee's home. The hard-wired electrical sockets and ring mains supplies are the employee's own responsibility.
- Provide, where practicable, scope for varying work patterns and to allow employee input in how the work is carried out to ensure home workers take periodic breaks during the working day.
- Ensure that home workers are kept informed of what is going on. Recognising and satisfying the need for social interaction will reduce stress.
- Encourage home workers to 'network' with colleagues.
- Issue all home workers are provided with health and safety guidance, such as 'INDG226' The Home Working Guide for Employees.
- Make the home worker aware of their duty to report any incidents or accidents that occur because of work related activities using the accident procedure.
- Ensure home workers are aware of the need to monitor their own working conditions and report any problems accordingly.

An assessment will be carried out in 2 stages:

- The first is to complete the General Assessment Pro-forma which is available from Wirehouse Employer Services.
- The second is to complete detailed assessments of each workstation using the services of a Health and Safety Consultant should this be necessary.
- All home workers are fully trained in the tasks that they are employed to do and the equipment they will be using.
- Home workers are trained in emergency procedures in case of an accident in the home.
- We are trained in how to deal with employees working off site e.g. prearranged regular contact, and how to recognise signs of stress in home workers.

Hot Water and Surface Temperature

We have a duty to protect people from the exposure of burns and scalds caused by hot water. Contact with hot water and with hot radiators or heating pipes pose a risk to our personnel and others.

Water which is supplied at a temperature above 43°C may cause heat injuries. The higher the temperature, the shorter the time this will take. At or below 43°C the risk of burning or scalding is substantially reduced.

The greatest risks of scalding occur when immersion of the whole body takes place such as in bathing or showering. Risks from the use of sinks or basins are less but measures to avoid scalding are still required in certain cases.

Risks from showers require two forms of control - engineering controls and management controls.

We will ensure that all training and supervision is given to ensure that they have a thorough understanding of the risks involved and what steps are required to control those risks. Trained employees are to use a thermometer to periodically check the temperature of the water. Records will be kept.

Where there are heated surfaces such as radiators or heating pipes in the vicinity, burning, due to contact with these surfaces, poses an additional risk.

As part of controlling the risk of burning, where the radiator surface is accessible, we will reduce the surface temperature to below 43°C, or we will provide guards to the radiators.

Knife Safety

We recognise that inappropriate use and storage of knives can present hazards and risks to all persons using them. We will therefore introduce controls to ensure that the risks associated with the use of the knives are minimised.

To ensure that we manage knife safety we will:

- Identify trained employees who are authorised to use knives.
- Provide knives for authorised employees which are suitable and safe for the tasks intended.
- Provide suitable storage facilities for knives to ensure that they remain safe when not in use.
- Provide employees with the means to maintain their knives in a good, safe condition.
- Arrange for the maintenance of knives where this cannot be undertaken by the authorised employee.
- Provide personal protective equipment where a risk assessment concludes that personal protective equipment is required.
- Ensure all personal protective equipment adequately protects the individual from the hazard, fits properly and is as comfortable as possible.
- Provide personal protective equipment that conforms to relevant standards.
- Provide employees using personal protective equipment with relevant information and training.
- Supervise and monitor employees to ensure the personal protective equipment is being used correctly.
- Keep a record of all personal protective equipment issued.
- Discipline employees who repeatedly refuse to use personal protective equipment in the correct way.

Ladders

We will ensure that only employees trained in the use of ladders and steps can use them and that all ladders and steps are regularly inspected.

All ladders and steps in use or belonging to us will be inspected for safety on an annual basis. Any equipment that does not meet the standard required to maintain safety is to be either repaired and tested or discarded.

The colour coding is as follows: -

- Blue Industrial
- Green Commercial
- Red Domestic

Training and supervision is given and records of this training and supervision will be maintained.

The training will include a demonstration of correct use of ladders and steps and cover the following points:

- Use of the correct type and height of ladder or steps.
- Placement of the ladder or steps on a safe, non-slip and level base and for ladders with the upper part of the ladder resting against a firm surface.
- Rungs/steps should be in good condition, clean and strong enough to bear the weight.
- Type of suitable footwear, which is to be worn.
- When to ask for assistance to 'foot' or hold the ladder or steps.
- Storage and handling: ladders and steps will be stored securely to avoid them falling on people or obstructing walkways or exits.

Before using steps or ladders employees are to inform us if they have:

- Any problems or worries that they may have about using either steps or ladders.
- Any medical problems or conditions that may affect their safe use of steps or ladders.
- Any history of accidents when using steps or ladders.
- Any doubts that they have regarding the condition or use of steps or ladders.

Legionella Management

We are responsible for the implemented arrangements to prevent the growth of legionella bacteria in water systems in accordance with the HSE's 'Approved Code of Practice (L8) – Legionnaires Disease: The Control of Legionella Bacteria in Water Systems' and 'HSG274 Legionnaires disease: Technical guidance' and Health Technical Memorandum 04-01: The Control of Legionella, Hygiene, "Safe" Hot Water, Cold Water and Drinking Water Systems.

These arrangements include:

- The assessment of Legionnaires' disease risk and preparation of a scheme for preventing or controlling the risk, conducted by a competent contractor.
- The appointment of a designated individual as the 'responsible person' with authority and responsibility for day-to-day implementation of the universal precautions and testing specified in the HSE's ACoP and any precautions specified in the risk assessment.
- The maintenance of records of all applicable maintenance and testing together with a copy of the risk assessment and details of the competent person who conducted it.
- Monitoring by a designated employee to check the records and confirm that the precautions have been implemented.

All plumbing alterations are carried out by trained plumbers to ensure compliance with water regulations and byelaws.

Local Exhaust Ventilation

Local exhaust ventilation (LEV) is an engineering control used to control the exposure to airborne contaminants in our workplace. A LEV system includes (but is not limited to) a hood, ducting, air clean or arrestor, air mover and a stack to discharge the contaminants into a safe place.

We have a legal duty under the Control of Substances Hazardous to Health Regulations to ensure that we control the exposure to employees so far as is reasonable and to protect the employees' health, safety, and welfare we have installed a LEV system.

As it has been identified to control the risk of exposure our LEV will be installed safely we will ensure that:

- The LEV is maintained in efficient working order.
- Employees are trained in how to use the LEV.
- That employees follow all instructions that have been given in relation to using the LEV.
- We check the system as required and recorded the details in the logbook.
- Repairs are carried out when they are necessary and not to wait for the 14month inspection interval.
- At every 14-month intervals or earlier as required the LEV system is tested and examined.
- The maintenance of LEV systems will be arranged with a competent person who has the knowledge, skills and experience to do the job properly.
- We carry out risk assessments for the testing and maintenance of LEV systems to ensure that the risks are properly controlled to reduce the likelihood of contact with moving parts; falls from height when accessing ductwork and other components and electrical shock.
- Test labels are attached to the LEV system.
- We will keep all test examination records for at least five years.

When we use LEV systems, we will consider the following points when choosing to install a LEV system:

- We will identify the jobs that need to have a LEV system installed and the types of contaminants that need to be removed from the air.
- We will establish what the LEV system needs to do to effectively protect the health and safety of our employees and others from exposure.
- We will ensure that when we purchase a LEV system that it only comes from a reputable and competent supplier.

We will ensure that the LEV system has airflow indicators or a test point, or equivalent. (See installation below for an example).

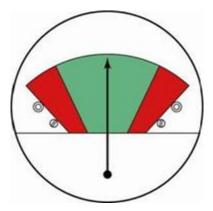


Figure 1. Simple air-flow indicator that can be fitted to LEV

We will ensure that all employees using the LEV system are informed on its design and have training on the use of the LEV system. All employees using the LEV system will be trained to:

- Understand how the LEV is working correctly.
- The consequences of the LEV failing.
- What to do when the LEV stops working correctly.
- How exposure may occur.

All training given will be recorded, including refresher training. We will provide toolbox talks as and when they are required, after each session employees will be asked to sign to say that they have attended.

The LEV system The hood has three basic types:

- Enclosing.
- Receiving.
- Capturing.

They are designed to contain the contaminants and prevent them from dispersing into the air. Once they have been captured the ductwork will be able to carry the contaminants away as efficiently as possible. The ductwork will have minimal bends to make the process more efficient and as smooth as possible.

The fans in the LEV system are to be carefully selected to allow air to be drawn through the system and not have excess noise produced. When selecting the fan, it is important to establish the volume of the air that is to be moved; the contaminants that the system is removing; the capital and running costs; the ease of maintenance; the operating temperature and the resistance that it must overcome.

Finally, once the contaminants have gone through the LEV system they are to be discharged through the stack to the outside of the building. The stack will be vertical, and the height and discharge velocity needs to be sufficient to allow any contaminants that have not been removed to be dispersed into the atmosphere. Further guidance can be obtained from the Environment Agency.

It is important to note that rain does not get into the system as this can cause damage and prevent the system from working efficiently.

When we have a LEV, system installed or is altered, we will ensure that we have a user manual which incorporates:

- A description of the system with diagrams.
- A maintenance parts list.
- Performance from commissioning.
- Description of the statutory thorough examination and test requirements and exposure targets.
- Signs of wear and control failure to look out for.
- How to use the LEV effectively.

A logbook which incorporates:

- Schedules for regular checks and maintenance.
- Records of checks, maintenance, replacement, and repairs.
- Checks that the LEV is being used in the right way.
- The name of the person who made these checks.

A commissioning report that incorporates:

- A description of the system with diagrams, including test points.
- Details of the LEV performance specification.
- Results such as pressures and air velocities at stated test points.
- Calculations made.
- Written descriptions of commissioning, the tests made and the outcome along with any air sampling results.
- A description of the how operators should use the LEV so that it works effectively.

If we do not have these three documents, we will request for the LEV to be recommissioned and if it changes in any to have it recommissioned.

Lone Working

Since we cannot be with them in an emergency, (they would not be lone workers if we were) we must go as far as we can in helping employees to help themselves.

We will consider protection, consisting of two components: prevention and response. Prevention is achieved by embedding ways in which employees avoid difficult situations in the first place. Response is there when protection fails. While prevention may reduce the number of occasions where a lone worker will get into a situation which will result in their harm, 'reduce' is not the same as 'eliminate', so there will always be a need for response services.

Response with prevention in isolation are still insufficient; adding training and management will result in a culture of safe working, in other words – protection.

Prevention starts with a well thought out policy leading to sensible procedures which are developed in consultation with the lone working employees and their managers.

Sooner or later prevention will fail, and an employee will need a response; and it must be fast and effective.

Training binds prevention and response together. Training will cover:

- The application of policies and procedures.
- How to make best use of lone worker response devices.
- Awareness and how to avoid potentially dangerous situations.
- How to manage dangerous situations.
- The role of personal responsibility for personal safety.

Good management will balance the needs of the organisation against the needs of the individual. Management will protect the organisation in law with its reputation and effectiveness intact, while protecting the individual employees out on their own in the community, other workplaces or in transit between them.

We have a responsibility for protecting lone workers and the needs to consider many factors; among them:

- How best to achieve protection for both the organisation and lone workers without jeopardising the work they are employed to do.
- What can be done in-house and what can be outsourced?
- How initial and follow-up training will be delivered, whether in-house or outsourced.
- How lone workers will be motivated to always follow the procedures laid down for them, including use of lone worker response services.
- What reports will help manage the contract and how will they be delivered.
- Regular reviews with lone workers.

Prevention and response without training and management is not an effective policy because when it is most required to work it will not keep people safe.

Prevention + Response + Training + Management = Protection

When putting the policy and risk assessment together we will pay consideration to:

- The remoteness or isolation of workplace areas.
- Any problems with communication.
- The possibility of interference, such as violence or criminal activity from other persons.
- The nature of injury or damage to health and anticipated "worst case" scenario.
- Vehicle and load hazards.
- Personal protective equipment required.
- Supervision and welfare.
- Portable first aid kits.
- Availability of a first aider.
- Means of summoning help.
- Means of raising an alarm.
- Firefighting equipment.
- Training and supervision.

Manual Handling

Statistics show that manual handling is one of the most common causes of absence through injury in the workplace. More than one third of lost time accidents are caused in this way. These injuries may often have long-term effects. We intend to reduce the risk of manual handling injuries and to provide guidance on the measures that are to be taken to ensure safe lifting and carrying in our workplace.

We will ensure that operations which involve manual handling are eliminated, so far as is reasonable. Measures to achieve this include ergonomic design of our workplace and activities and the provision of automated or mechanical aids such as trolleys, chutes and conveyors.

An assessment of manual handling activities will be carried out by competent persons. Risks which are identified will be reduced to the lowest level reasonable. The following factors will be considered during the assessment.

Bending and stooping to lift a load significantly increases the risk of back injury. Items will ideally be lifted from no lower than knee height to no higher than shoulder height. Outside this range, lifting capacity is reduced and the risk of injury is increased. Where items are required to be lifted from above shoulder height, a stand or suitable means of access will be provided. Items which are pushed or pulled should be as near to waist level as possible. Pushing is preferable particularly where the back can rest against a fixed object to give leverage.

Carrying distances will be minimised, especially if the task is regularly repeated. Repetitive tasks will be avoided wherever possible. Tasks which involve lifting and carrying will be designed in such a way as to allow for sufficient rest breaks to avoid fatigue. We will avoid tasks which require twisting the body wherever possible.

The load is to be kept as near as possible to the body trunk to reduce strain and should not be of such size as to obscure vision. An indication of the weight of the load and the centre of gravity will be provided where appropriate.

Unstable loads are to be handled with caution. The change in centre of gravity is likely to result in overbalancing. We will ensure that there is a secure handhold, using gloves where necessary to protect against sharp edges or splinters.

Consideration will be given to age, body weight and physical fitness. Regard will be given to personal limitation; employees must not attempt to handle loads that are beyond their individual capability. Assistance is to be sought where this is necessary.

Persons with genuine physical or clinical reasons for avoiding lifting will be made allowance for, as will pregnant women, who will not be required to undertake hazardous lifting or carrying tasks.

Sufficient knowledge and understanding of the work is an important factor in reducing the risk of injury. Individuals undertaking lifting or carrying will be given suitable instruction, training and information to undertake the task with minimum risk.

There will be adequate space to enable the activity to be conducted in safety and the transportation route will be free from obstruction. Lighting, heating and weather

conditions will be considered. Floors and other working surfaces will be in a safe condition and adequate ventilation will be provided, particularly where there is no natural ventilation.

Use of personal protective equipment may be necessary whilst carrying out manual handling activities. If the use of equipment restricts safe and easy movement, this is to be reported. Constant interruptions from other employees is to be avoided, as this can reduce the concentration of an individual.

We will ensure that:

- Manual handling assessments are carried out where relevant and records are kept.
- Employees are properly supervised.
- Adequate information and training is provided to persons carrying out manual handling activities.
- Any injuries or incidents relating to manual handling are investigated, with remedial action taken.
- Employees adhere to safe systems of work.
- Safety arrangements for manual handling operations are regularly monitored and reviewed.
- Employees undertaking manual handling activities are suitably screened for reasons of health and safety, before undertaking the work.
- Special arrangements are made, where necessary, for individuals with health conditions which could be adversely affected by manual handling operations.

Employees are to ensure that:

- They report (in confidence) any personal conditions which may be detrimentally affected by the manual handling activity.
- They comply with instruction and training which is provided in safe manual handling activities.
- Their own health and safety is not put at risk when carrying out manual handling activities.
- They use equipment which has been provided to minimise manual handling activities.
- Any problems relating to the activity are reported to a responsible person.

Suitable information and training is provided to persons who are required to carry out manual handling activities. Training needs will be identified and reviewed by a responsible person. Refresher training will also be given at reasonable intervals.

Employees will be informed of approximate weights of loads that are handled and objects which have eccentric weight distribution.

Poor lifting and carrying techniques can result in discomfort and increase the risk of injury. In extreme circumstances, these injuries can have permanent effects. These risks can be reduced by adopting the following simple precautions:

- Ensuring that formalised systems of work which have been designed for the work activity are complied with.
- Making full and proper use of aids to lifting and carrying, such as trolleys, chutes and access equipment.
- Storing heavy items between shoulder and hip height. Where possible only storing small, light items above shoulder or below knee height.
- Using the legs and knees to bend and lift, not stooping or bending the back.
- Avoiding tasks which require stretching or twisting.
- Ensuring that regular rest breaks are taken where manual handling activities are repetitive or to prevent the onset of fatigue.
- Ensuring that there are no sharp, hot, or cold edges which could cause injury.
- Ensuring that walkways are free from obstructions.
- Making full and proper use of personal protective equipment.

Employees are to report any problems or concerns associated with manual handling operations to their manager.

Monitoring

We have in place active monitoring systems to ensure any statutory duties applicable to us are complied with and to ensure our standards are being achieved. Monitoring activities will help us identify any issues that need attention.

It is important that any monitoring activity reports accurately reflect the conditions apparent at the time of the review. Completed monitoring documentation assists us with our intentions for continuous improvement. Documented findings and consequent follow-up action help us prove to any visiting authority that we take safety seriously.

Monitoring Events

We will also utilise the monitoring checks sheets to confirm we are achieving our intended standards and that employees are adhering to our rules, policies and procedures.

Any action raised because of completing monitoring will be addressed within a reasonable period. We will amend this list as required.

Activity	Frequency
Business Review and Health Check	Annually
 Review - Fire Risk Assessment Office Assessments Key Risk Assessments Method Statement Workshop Task Assessments Equipment Assessments Training Matrix 	Annually
 Display Screen Equipment Assessment Hazardous Substance Assessments 	Every Two Years
General Inspection – All Areas	Quarterly
Recorded Vehicle Checks	Monthly
Driving Licences	Six-monthly
Upkeep of Fire Log	Weekly

Near Miss

We have a procedure in place to provide a method for reporting 'near miss' incidents. The investigation of such incidents can help to implement procedures or control measures which will prevent a recurrence of the incident and therefore prevent potential accidents.

Often the difference between a 'near miss' and an accident resulting in injury is minimal a slight difference in timing, location, or personnel.

A 'near miss' is an unplanned event that did not result in injury, illness, damage, or product loss but had the potential to do so.

An 'accident' is an unplanned uncontrolled event that has led to injury, illness, damage, or some other loss.

All employees are to report 'near miss' incidents as soon as possible following the incident.

The near-miss form is to be used to report the incident. As much detail as possible is to be provided to ensure a thorough investigation can be carried out. When completed the form is to be returned to a manager.

We will collate the forms and carry out any required investigations. Completed forms will be retained for a minimum period of three years.

New and Expectant Mothers

We have a duty to protect new and expectant mothers from hazards that may be present. We will carry out risk assessments for each employee who is either pregnant or has recently become a new mother. We will continually review the risk assessments after 3 months or sooner if necessary to manage new risks that may be present.

To protect the health, safety, and welfare of our employees, we will assess the risks that we pose on the employee and decide on reasonable control measures.

We will:

- Consider any substances that they may be exposed to.
- Assess the set-up of their work area.
- Assess their manual handling.
- Look at their welfare arrangements.
- Look at their work activities.

Regular reviews are required. If it has been identified from a risk assessment that work activities could adversely affect a person's health, we will offer alternative work for them to do and if this is not possible, we will suspend them from work on paid leave.

Noise at Work

Noise at work can cause temporary or permanent hearing loss. People often experience temporary deafness after leaving a noisy place, but usually recover their hearing within a few hours. Permanent hearing damage can be caused immediately by sudden, loud, explosive noises, but hearing loss is usually gradual due to prolonged exposure to noise. People may only realise how deaf they have become when damage, caused over the years by noise, combined with hearing loss due to ageing. Hearing loss is not the only problem. People may develop tinnitus (ringing in the ears), a distressing condition which can lead to disturbed sleep.

The Control of Noise at Work Regulations lay down key limits to noise exposure. These are:

- Lower exposure action values
 - Daily or weekly exposure of 80 dB
 - Peak sound pressure of 135 dB
- Upper exposure action values
 - Daily or weekly exposure of 85 dB
 - Peak sound pressure of 137 db.

The steps we are required to take depend largely on the level and type of noise exposure. For example, a noise exposure of just over 80 dB-A may only require basic controls and recommended hearing protection for certain tasks. Over 85 dB-A would require more rigorous controls and the establishment of a mandatory hearing protection zone with appropriate health surveillance.

Noise sources more than peak sound pressure values will need specific assessment by a competent person and specific controls.

The aim is to ensure the health, safety, and welfare of affected persons, in relation to noise exposure and to comply with all relevant legislation, including:

- Health and Safety at Work etc Act.
- Management of Health and Safety at Work Regulations.
- Control of Noise at Work Regulations.
- Control of Vibration at Work Regulations.
- Personal Protective Equipment at Work Regulations.

To ensure that we prevent or reduce risks to health and safety from exposure to noise at work and that our procedure will be clearly understood throughout the company, we will:

- Assess the risks to employees from noise at work.
- Act to reduce noise exposure and the risks arising from noise at work.
- Provide employees with hearing protection, where required, if noise exposure cannot be reduced by other methods.
- Make sure that the legal limits on noise exposure are not exceeded.
- Provide employees with information, instruction, and training.
- Carry out health surveillance where levels indicate it is required.
- Review this procedure at least annually or more frequently if changes occur.

To fulfil our responsibilities as outlined above, we will:

- Identify all operations where there is a noise risk and who is likely to be affected.
- Carry out an initial noise survey.
- Ensure that the risks from noise at work are assessed by a competent person, where we have identified a potential problem.
- Take the necessary action to reduce the noise exposure that produces these risks, ensuring that the legal limits of noise exposure are not exceeded.
- Provide persons with suitable hearing protection where noise exposure cannot be reduced enough by using noise control techniques.
- Provide people with adequate information, instruction, and training to understand the noise risks that they may be exposed to and how to use noise control techniques and the hearing protection provided.
- Carry out health surveillance where the noise risk assessment has identified there is a risk to health.
- Review, and amend as necessary the noise risk assessment on an annual basis, when significant changes or accidents occur or when we have any reason to believe the assessment is no longer valid.

Non-Hazardous Waste

We have a duty of care to ensure that any waste which we produce is handled, stored, and managed safely in accordance with specific legislation. We will ensure that any waste which we produce other than hazardous is removed from our premises by a licensed waste carrier. To ensure that we are compliant with legislation we will ask from the waste carrier for an annual note as the waste will be regularly removed, and it also shows the enforcement officer from either the Local Authority or the Environment Agency that our waste is being removed legally; these will be kept for two years minimum.

We will ensure that the waste we produce is not placed in domestic bins, litter bins and at household waste recycling centres unless we have a waste carrier's licence and pay a charge for the removal of our waste, and we will request for a waste transfer note to prove that our waste disposal is compliant.

We will monitor and assess our waste and ensure that we are not overfilling bins. We will train all employees and inform them on where the waste goes and how to manage it.

Under no circumstances is an employee to climb into a bin or a skip to flatten the waste. If an employee identifies that the bin is full, they are to report this.

Occupational Road Safety

Health and safety law applies to work activities on the road in the same way as it does to all work activities and employers need to manage the risks to drivers as part of their health and safety arrangements. We follow a 'Plan, Do, Check, Act' approach to achieving work-related road safety.

Plan - This is how we manage health and safety in our organisation and plan to make it happen in practice by:

- Assess the risks from work-related road safety.
- Produce a health and safety policy.
- Make sure there is top-level commitment to work-related road safety.
- Clearly set out everyone's roles and responsibilities for work-related road safety. Those responsible will have enough authority to exert influence and be able to communicate effectively to drivers and others.

Do - Prioritise and control the risks we will consult with our employees and provide training and information.

- Make sure departments with different responsibilities for work-related road safety co-operate with each other.
- Make sure we have adequate systems to allow us to manage work-related road safety effectively.
- Make sure we involve our workers or their representatives in decisions. This is a good way of communicating with everyone about health and safety issues.
- We will provide training and instruction where necessary.

Check – Measure how we are doing.

- Monitor performance to ensure our work-related road safety policy is effective and has been implemented.
- Encourage our employees to report all work-related road incidents or near misses.

Act – Review our performance and learn from our experience.

- We will collect enough information to allow us to make informed decisions about the effectiveness of our existing policy and the need for changes, for example targeting those more exposed to risk.
- Regularly revisit our health and safety policy to see if it needs updating.

The nature of our work requires selected employees to use our vehicles. Only employees who have been granted our permission to drive company vehicles may do so. Before we authorise use, employees must provide us with their driving licence to help confirm driver competence. Employees must only drive the category of vehicle for which they hold a current valid licence. We will select the most suitable vehicles for tasks to be performed. Vehicles are classed as work equipment and will therefore be inspected and maintained at periodic intervals to ensure their roadworthiness and safety. We will follow manufacturer's recommendations for inspection, servicing and maintenance tasks. Other mandatory tests such as the Department of Transport MOT will be arranged at the frequencies stipulated. The nature of our work requires selected employees to use their vehicles for work purposes. Before we authorise an employee, employees must provide us with their driving licence to help confirm driver competence and copies of a current valid insurance certificate covering business use and a current MOT certificate (if relevant). Employees are only to drive the category of vehicle for which they hold a current valid licence.

In the interest of safety, employees are requested to keep us informed of any road traffic offences for which they have been convicted. Driving licences will be reviewed at least, on a six-monthly basis.

Drivers are responsible for conducting a pre-use check of the vehicle and for identification and reporting of faults (company vehicles). Where necessary training will be provided for conducting vehicle pre-use checks.

Drivers must:

- Only use the vehicle if they have our authorisation to do so.
- Read our risk assessment for driving activities and comply with any control measures we have introduced in the interest of safety.
- Have a current valid insurance certificate covering business use (own vehicle).
- Have a current valid MOT certificate (own vehicle if relevant).
- Check the vehicle before use.
- Act responsibly and abide by the Highway Code.
- Only use our vehicles for authorised journeys.
- Use the vehicle for its intended purpose only.
- Ensure all loads are safely secured.
- Take additional care in inclement weather conditions.
- Inform us if they are ill or taking prescription drugs that may have a detrimental effect on their driving ability, i.e. causing drowsiness.
- Focus their attention whilst driving.

Drivers must not:

- Use a vehicle if faults deem it unsafe for use.
- Under any circumstances drive vehicles if they are suffering the effects of alcohol or drugs.
- Overload any vehicle.
- Smoke in our vehicles.
- Carry unauthorised passengers in our vehicles.
- Adjust a satellite navigation aid whilst driving; or
- Partake in an activity distracting their attention from driving.

It is illegal to drive if either:

- They are unfit to do so because they are on legal or illegal drugs.
- They have certain levels of illegal drugs in their blood. (Even if they have not affected their driving).

Obviously, all drugs that are illegal are always banned, not just when driving. Legal drugs are prescription only medicines, or over-the-counter medicines. However, in certain quantities some prescription drugs that are perfectly legal to take can make it against the law to drive. Taking these drugs without a prescription is prohibited and would be treated the same way as taking illegal drugs. If drivers are taking them and are not sure if they should drive, they are instructed to talk to their doctor, pharmacist or healthcare professional or refer to the patient information leaflet, regarding the effects on driving.

The government's website (GOV.UK) advises drivers to consult their doctor about whether they should drive if they have taken any of the following drugs:

- Amphetamine, e.g. dexamphetamine or selegiline.
- Clonazepam.
- Diazepam.
- Flunitrazepam.
- Lorazepam.
- Methadone.
- Morphine or opiate and opioid-based drugs, e.g. codeine, tramadol or fentanyl.
- Oxazepam and temazepam.

If a driver is convicted of drug driving, the punishment includes:

- A minimum 1-year driving ban.
- An unlimited fine.
- Up to six months in prison.
- A criminal record.

Driving licences will also show that they have been convicted for drug driving. This will last for 11 years whilst the penalty for causing death by dangerous driving under the influence of drugs is a prison sentence of up to 14 years.

A conviction for drug driving also means:

- Car insurance costs will increase significantly.
- Persons will see the conviction on the driver's licence.
- Trouble travelling to countries like the USA.

Satellite navigation aids may be used in vehicles but are not to be adjusted whilst moving or in traffic. The device is to be programmed before starting a journey, alternatively pulled over to a safe place to adjust.

Drivers are instructed to concentrate on driving and avoid distractions. Answering and sending telephone calls, sending text messages, accessing the internet, etc. are all distractions and in certain circumstances could amount to an offence of driving without care and attention or even dangerous driving.

It is a criminal offence to use a hand-held mobile telephone or similar device while driving. The relevant regulations permit the use of hand-held mobile telephones while driving only in an emergency.

Any mobile telephone that is or is to be held at any time while in use is a hand-held telephone. The use of an earpiece does not make a telephone hand free. To be hands free the telephone must be fixed or in a cradle. (Two-way radios are not hand-held instruments and are exempt from the regulations.)

If the telephone or equipment is hands free it is permitted to press buttons to send and receive messages. However, even the use of hands-free telephones can be dangerous. Whenever possible drivers are to wait until the vehicle is stationary and in a safe place before using a hands-free telephone.

Driver fatigue is a major cause of accidents and can cause fatalities. If drivers are tired, they must park up, rest and recuperate. On long journeys they must take at least a 15-minute break for every two hours of driving.

It is our policy that all employees are to drive within speed limits and road restrictions. Therefore, we will not compensate employees for any speeding fines. Employees that are convicted of speeding fines whilst driving on company business may be subject to discipline.

In the event of a breakdown or an accident; drivers must act promptly to avoid further harm especially if they are on a fast-moving road, i.e. a dual carriageway or motorway. They are to:

- Assess the situation and decide what action is required.
- If the vehicle is at the roadside not to stay in the vehicle.
- Wear high visibility vests and move away from the vehicle and other traffic.
- Call the insurance/breakdown service helpline for assistance and be prepared to give them details such as:
 - Vehicle registration.
 - o Location.
 - Nature of the incident.
- If anyone is injured, then the emergency services are to be called.
- Wait in a safe place until help arrives; only help others if it is safe to do so.

In the event of an accident drivers must take details of other vehicles/drivers involved and record what happened. This should be done as soon as possible.

Any breaches of our driver safety rules will be considered as gross misconduct which may lead to summary dismissal.

Office Safety

The office areas do not contain the same hazards as the external areas but there are issues to address to ensure everyone's safety working in the office. Generally, office areas are a lower risk compared to other areas. Nevertheless, they still pose a risk of injury or ill-health to persons using and accessing the office space. An office risk assessment has been completed and it will be communicated to employees.

The assessment addresses issues such as:

- Manual handling.
- Display screen equipment.
- Fire and electrical safety.
- Chemicals.
- Temperature, lighting, and ventilation.
- Welfare facilities.
- Stress.
- Trips and falls.

Employees are responsible for ensuring that walkways are free from obstructions and that trailing cables are not creating trip hazards.

The office space has been designed to enable employees to work comfortably. People who have concerns over the office area are to report it accordingly.

Outdoor Activities and Trips

We recognise that outdoor activities and trips expose people to hazards, which are not present during normal activities and require specific controls. Outdoor activities and trips may also be residential and therefore we recognise that suitable accommodation should be used.

It is our policy to:

- Ensure that all trips will be thoroughly planned, and the locations vetted by employees or other agencies.
- Ensure that permission is obtained for the trips from the relevant persons and that they are kept fully informed where applicable.
- Ensure that the relevant ratios are maintained at a safe level.
- Ensure that all accommodation is suitable for the purposes of the trips.
- Carry out generic, site specific and on-going risk assessments as appropriate.
- Ensure any third party used has been thoroughly vetted and hold the appropriate qualifications.

Outdoor Activities

Health may be affected by working outdoors; appropriate measures are put in place to protect from the cold, the sun and other adverse weather conditions. Where rules are established for this purpose, they are there to protect the people affected.

Our key points to consider are:

- Working in intense cold can slow a person down physically and mentally. Reactions are slower and decision making even about simple things becomes harder. Hence accidents are more likely.
- In extreme weather conditions, if possible, arrange a work rota system so that regular periods are spent out of the cold and wind.
- Hypothermia usually occurs when a person can no longer maintain their body temperature at about 37°C. Shivering is usually the first sign, but some people do not seem to shiver. If a person begins to feel cold, they are to report this and take a short break in a warm place. Have a warm drink and a snack during breaks.
- Be aware of their colleagues and others around them as they may not notice the onset themselves.
- Chill Factor is the added effect of wind on the body, which makes it seem colder than the thermometer reads. At 0°C and 10mph wind, the chill factor may make it seem like minus 10°C, so extra protection is called for.
- Chilblains, Frostbite and Skin Damage are not confined to Artic explorers. They are extremely painful and disabling so prevention is better than cure. Warm gloves and socks are essential but if a person can feel their extremities getting cold, they are to change into a warm dry pair. Protective creams are available for face and wrists etc., to replace the natural oils dried up by the cold and prevent cracking and peeling.
- Long sleeved vests, long johns, thermal underwear etc., may be the butt of jokes, but if they keep a person warm it is better to be laughed at for a few minutes than unhealthy for the rest of their life.
- Cold weather may also bring about other hazards such as:
 - Frozen ground leading to ice and slip and trip incidents.
 - Frozen materials and equipment such as the metal scaffold poles leading to freeze burns to hands.
- Sunburn is very common, very painful but easily avoided. Glare from an overcast sky can also cause burns on sensitive skins. Ultraviolet light causes premature ageing (wrinkling) of skin and increases chances of skin cancer. (Malignant Melanoma).
- Sun blocking lotion is recommended but takes account of how long a person will be in the sun, a high protective index is probably required, we will ensure that it is applied often and after all breaks; The phrase 'Slip, Slop, Slap' is a good reminder. Slip on a t-shirt, Slop on some sun cream and Slap on a hat.
- Prickly heat is brought on by working in hot conditions. It causes groups of small itchy spots on the skin. Frequent washing to remove sweat, wearing loose cotton clothes and if possible. We advise our employees that periods of work out of the hot location area is recommended.

- Heat exhaustion is the combination of high temperature, exertion and loss of fluid and salt through sweating. It can be dangerous if not recognised and can lead to hypothermia. Fainting, cramp and nausea can overcome the unwary. Frequent rest and plenty of cool, but not iced drinks are necessary as this can result in cooling of the core of the body too quickly.
- Weather extremes may also exacerbate existing health conditions such as:
 - Rheumatism.
 - Bronchitis and other chest conditions.
- Prolonged exposure to conditions such as working in water can lead to conditions such as:
 - Trench foot.
- If an employee has an existing health condition that may be affected by working outdoors, they are to report it.

Racking

We recognise our duty to protect people from the risk presented by our racking storage systems.

We will ensure that:

- We carry out risk assessments regularly by a competent person.
- Employees have been given information on the safe working loads and signage is displayed on the racking.
- We provide the relevant personal protective equipment where necessary.
- We communicate with all employees the safe systems of work and procedures.
- We have nominated employees to identify hazards and risks and manage the racking storage system.
- We only buy racking from reputable companies and ensure racking is designed and constructed by a competent person.
- Employees are instructed not to climb on the racking to access items.
- We regularly inspect our racking systems and if necessary, provide racking protection.
- All employees are instructed to immediately report damage and defects.

Refusal to Work on the Grounds of Health and Safety

We have a commitment to health and safety, advising people of hazards, providing safety training and keeping the lines of communication open to encourage an atmosphere where people feel free to raise health and safety concerns at any time and provide the right to refuse work for health and safety reasons.

An employee may refuse to work or do work if he/she has reason to believe that:

- Any equipment, machine, device, or thing they use or operate is likely to endanger themselves or another person.
- The physical condition of the workplace or environment in which they work or where work is likely to endanger them.
- Any equipment, machine, device, or thing they operate or the physical condition of our workplace in which they work is in contravention and such contravention is likely to endanger themselves or another employee.

First Stage Refusal

- Upon refusing to do unsafe work, the employee is to immediately report the circumstances of the refusal to their Line Manager. The Line Manager is to inform the person in charge of health and safety.
- We will immediately investigate the report in the presence of the worker.
- During the investigation we will record as many details as possible regarding the refusal.
- The most senior person will only actively become involved if the refusal progresses to the second stage.

Second Stage Refusal

- If the employee is dissatisfied with the results of the investigation and has reasonable grounds to believe that the circumstances are still such that the work is dangerous, then they may continue to refuse to work.
- Upon the continuance of the employee's refusal to work, we will request the involvement of the Directors.
- The Directors will investigate the work refusal in the presence of the Manager and the employee.
- Pending the investigation and the decision of the Directors, the employee is to continue to remain at our workplace during their normal working hours unless The Directors assigns the employee reasonable alternative work during those hours, or, if such an option is not practicable, The Directors may give the employee other directions (which may include being sent home).
- No other employee is to be assigned to work that is being investigated unless that employee has been advised of the other employee's refusal and reasons for it and has signed a statement of being advised of the refusal.
- After the investigation, we will decide whether the machine, device, item, or workplace is likely to endanger the employee or another person. This decision will be given in writing, as soon as practical.
- If we do not consider the refusal to be based on reasonable grounds, the employee is expected to return to work. If, however, the employee maintains that they have reasonable grounds for refusing such work, we may seek further advice from our Health & Safety Advisors. If, however, no reasonable grounds exist for such further refusal, the employee may be subject to disciplinary action.

If an employee has acted in compliance with the refusal to work procedure, its regulations or an order made under them, they (or any person acting on their behalf) may not, because the employee so acted:

- Dismiss or threaten to dismiss the employee.
- Discipline or threaten to discipline the employee.
- Impose any penalty on the employee.
- Intimidate or coerce an employee.

If an employee complains that the manager (or a person acting on their behalf) has improperly taken any of these actions, he/she may file a grievance with another Director.

Respiratory Protective Equipment

Respiratory protective equipment (RPE) is designed to be worn in a contaminated atmosphere and to provide the supplier with a safe supply of air. The control of exposure to hazardous substances is to be achieved by means other than personal protective equipment where possible. Where this is not practicable and there is a likelihood of inhalation risks, suitable personal respiratory equipment will be provided.

There are two types of RPE.

- Respirators, which are designed to filter or clean contaminated air from the environment before it is inhaled by the wearer. These are not to be worn in environments which are immediately dangerous to life or health, including atmospheres where there is an oxygen deficiency.
- Breathing apparatus, which delivers breathable air from an independent source, usually bottles, to the wearer.

Personal protective equipment, including RPE, is to be a last resort for controlling exposure to hazardous substances, i.e. other measures to control exposure to hazardous substances are to be implemented where reasonable. One reason for this is that when RPE is used incorrectly or badly maintained, it may not provide the wearer with any protection at all.

Subject to a suitable and sufficient risk assessment, RPE will be used where:

- The level of exposure to the hazardous substance is likely to exceed the appropriate exposure limit.
- Emergency maintenance work requires employees to enter areas with high levels of contaminants or an oxygen-deficient atmosphere.
- Exposure is to be of short duration and other control measures are not reasonably practicable.
- Plant equipment fails and there is a need to escape.
- Rescue work by competent personnel is necessary.

The COSHH (Control of Substances Hazardous to Health) Regulations include a requirement that the initial selection process for all tight-fitting facepieces should include face-fit testing to ensure the wearer has a correctly fitting device. Fit Testing is also required under the Control of Asbestos at Work Regulations and the Control of Lead at Work Regulations.

RPE Fit Testing is required for all tight-fitting facepieces including all filtering facepieces (disposable face masks), half masks and full-face masks. This includes negative pressure full-face masks as well as power-assisted full masks, and both self-contained and air-fed breathing apparatus. We will ensure where applicable all employees receive a face fit test.

Safeguarding Children and Young People

Please also read Plan B's Child Protection and Safeguarding Policy. We have a duty of care to safeguard children and young people. A child or young person is anyone under the age of 18.

It is our policy to:

- Protect children and young people visiting; and
- Ensure that employees understand the overarching principles that guide our approach to safeguarding.

We aim to ensure that children and young people have a positive experience with us and that they do not experience abuse of any kind. We have a responsibility to promote the welfare of all children and young people and to keep them safe whilst in our care.

We recognise that the welfare of the child is paramount. We understand that there are four major types of abuse, these being:

- Physical.
- Sexual.
- Emotional and:
- Neglect.

Some children and young people may be particularly vulnerable because of past experiences.

We will put in place extra measures to safeguard children and young people who are disabled or from minority ethnic groups.

Everyone has the right to equal protection regardless of age, gender, disability, racial heritage, religious beliefs, sexual orientation, or identity.

To keep children safe whilst visiting we will:

- Recruit employees that have been vetted and have in place a valid up to date DBS certificate, which will be checked annually.
- Ensure that employees are informed about safeguarding arrangements and procedures.
- Ensure that we have whistleblowing procedures in place.
- Ensure that, where possible, no employee is left alone with a child or young person.
- Provide a safe physical environment for children and young people to be in.
- We will always listen to and respect children and young people.

Safeguarding is everyone's responsibility if an employee is worried about a child or young person, they are instructed to report their concerns. Doing nothing is NOT an option. If they believe that someone is in immediate danger, they are instructed to call the police (999).

NSPCC types of Child Abuse

- Domestic
- Sexual
- Neglect
- Online
- Physical
- Emotional
- Child Sexual Exploitation
- Female genital mutilation (FGM)
- Bullying and Cyberbullying
- Child trafficking
- Grooming
- Harmful sexual behaviour

Child abuse is any action by another person, whether adult or child, that causes significant harm to a child. It can be physical, sexual, or emotional, but can just as often be about a lack of love, care and attention. We know that neglect, whatever form it takes, can be just as damaging to a child as physical abuse.

Safety Signs, Signals and Notices

Safety signs are a useful way of communicating health and safety information. The Health and Safety (Safety Signs & Signals) Regulations covers various means of communicating health and safety information including acoustic signals (e.g. fire alarms), hand signals and the marking of pipework containing dangerous substances.

The regulations apply to all places and activities where people are employed. They require us to provide specific safety signs whenever there is a risk that has not been avoided or controlled by other means (e.g. by engineering controls and safe systems of work). Where a safety sign would not help to reduce a risk, or where the risk is not significant, there is no need to provide a sign.

The regulations also require us to:

- The use of road traffic signs to regulate road traffic.
- Use signboards (except fire safety signs, see below) to comply with BS 5378: Parts 1 and 3:1980.
- Use fire safety signs to contain symbols and comply with BS 5499: Part 1:1990
- The marking of dangerous locations and obstacles (e.g. where people may fall from a height or where there is low headroom) with stripes in built-up zones. The stripes will be yellow and black or red and white and will be at an angle of approximately 45°.
- Stores and areas containing significant quantities of dangerous substances will be identified by the appropriate warning signs, except where the labels on the containers can be seen clearly from outside the store and except where areas are marked in accordance with the Dangerous Substances (Notification and Marking of Sites) Regulations.
- Signboards will be illuminated, where necessary.
- Maintain the safety signs that are provided by them.
- Explain unfamiliar signs to our employees and tell them what they need to do when they see a safety sign.

The Health and Safety (Safety Signs and Signals) Regulations, although they use similar symbols, do not apply to labels used in connection with the supply of substances, products and equipment or the transport of dangerous goods, which is covered by other legislation.

SIGNBOARDS COMPLYING WITH THE HEALTH & SAFETY (SAFETY SIGNS & SIGNALS) REGULATIONS 1996

Purpose	Shape & Colour	Example
Prohibition Must not do	Round Black pictogram on white background with red edging and diagonal line	Please do not smoke
Warning	Triangular Black pictogram on a yellow background with black edging	Dangerous substance
Mandatory Must do	Round White pictogram on a blue background	Protective footwear must be worm in this area
Safe Condition Emergency escape or First aid	Rectangular or square White pictogram on a green background	First aid
Fire fighting	Rectangular or square White pictogram on a red background	Fire alarm

Slips, Trips and Falls

Slips, trips and falls are the most common cause of injuries in a workplace. We have a duty to protect persons visiting our premises from the risk of slips and trips. We have assessed the risks for slips and trips and falls. To prevent the occurrence of slips, trips and falls all employees have a responsibility to maintain a safe working environment.

To fulfil our duties, we will:

- Instruct all employees to maintain good housekeeping standards, keeping walkways free from obstructions and trailing cables.
- Instruct all employees to report any hazards that would result in a slip, trip or fall.
- Instruct cleaning employees to remove any waste daily to prevent the accumulation of waste.
- Carry out daily checks to ensure that the flooring is in good condition and free from any trip hazards.
- Instruct all employees that when spillages occur employees are to clean up promptly and any wet floors, floor signage is to be displayed clearly, however, where floors which people are required to use are to be dried so far as is reasonable.
- Encourage employees to wear appropriate footwear.
- Review accidents or incidents that have been caused by a slip or trip.
- Provide sufficient lighting to allow employees and others to move around our premises safely.
- Fix leaks promptly that are causing floors to become wet.
- Complete the appropriate risk assessments.

Falls are often discussed along with slips and trips, but they are very often much more serious and potentially fatal. Falling from height or falling from a vehicle are some common workplace accidents that can all be avoided by proper planning, assessments, training, and supervision. Employees are to remember that what they might fall onto is also an important consideration when considering the potential risk of completing a task at height. Even falls from vehicles and cabs will be considered as these are also a common cause of workplace injuries.

Before any work at height is undertaken it will be suitably assessed to either avoid doing it at all or to work out the best and safest way to complete it. This includes the use of ladders through to scaffolds and access equipment. You are encouraged to speak to our safety advisors when planning any height work or before engaging contractors to complete this work for us.

Smoking

We will:

- Protect everyone against the effects of second-hand tobacco smoke.
- Promote health in our workforce.
- Support those people who would like to quit smoking; and,
- Comply with the Health Act.

Research has shown that exposure to tobacco smoke either directly, as a smoker, or indirectly due to passive smoking can cause cancer, heart disease and respiratory problems as well as many other illnesses and minor conditions. Ventilation or merely separating smokers and non-smokers within the same airspace does not prevent harmful exposure effectively.

We are required to ensure that smoking is prohibited in virtually all enclosed or substantially enclosed workplaces and public places and company vehicles.

We have a duty to ensure that people have the right to a smoke-free environment, and so are protected from the dangerous effects of tobacco smoke.

All areas of our premises are designated as non-smoking. Any employee wanting to smoke must use the designated area. Smokers are requested not to smoke immediately outside the premises. This applies to employees, visitors, and contractors.

The management of us controlling smoking on our premises is intended to benefit all persons, whether employed by us or not. As part of our overall responsibility for ensuring that we protect people from the effects of tobacco smoke, we will inform them of the controls. We will monitor the no smoking policy and review when required.

Appropriate 'No Smoking' signs are clearly displayed. There will be no ashtrays or cigarette litter inside the building.

Any employee found smoking on the premises or in a vehicle may be liable to our disciplinary procedures. Any visitor or contractor found smoking in a no smoking area will be asked to stop or leave the premises. Those failing to protect others in this smoke-free environment may also face on-the-spot fines and/or possible criminal prosecution.

Subcontractors

We are fully committed to ensuring the health, safety and welfare of any subcontractor visiting carrying out their work. To protect subcontractors so far as is reasonable it is our responsibility to make known to subcontractors any hazards that have been identified and may affect such persons. We will ensure that our control measures are communicated, understood and followed to prevent harm.

Where we have identified that certain activities are to be subcontracted, we accept that we are responsible for ensuring that a subcontractor:

- Is competent to carry out the work for which they may be engaged.
- Is provided with all the information that they require to plan for the health, safety and welfare of their employees and anyone that could be affected by their work.
- Carries out any work in a manner that protects the health and safety of all who may be affected by the work.

To achieve the above, no subcontractor is permitted to commence work on our behalf until a 'Pre-Qualification Questionnaire' has been completed and approved and a signed acknowledgement has been received. Copies of the subcontractor's health and safety policy and Employer's Liability and Public Liability insurance certificates must also be provided.

A subcontractor may not subcontract part of the work for which he has been engaged without written permission.

Subcontractors are responsible for providing risk assessments and method statements for the work for which they are engaged. Where work involves the use of hazardous substances, COSHH assessments are to be accompanied by suppliers' safety data sheets and copies of any atmospheric monitoring carried out as required by any COSHH assessment are also to be supplied.

Subcontractors are responsible for providing evidence that persons working for them are suitably qualified and have received health and safety training.

When required to do so, subcontractors are to release their employees to attend inductions and toolbox talks. The subcontractor is also responsible for ensuring that all persons under their control are aware of the following:

- Fire procedures.
- First aid arrangements.
- Rules.
- Welfare arrangements.

Subcontractors are to ensure that all equipment used is fit for the intended purpose and in a good state of repair and that person's that will use it have received suitable training. Where equipment is subject to statutory inspection, copies of the most recent examination certificates may be requested. This applies to equipment owned by the subcontractor and equipment obtained on hire. We reserve the right to inspect equipment being used by subcontractors and will halt the use of equipment we consider unsafe, until the equipment is made safe.

Where a subcontractor will be using highly flammable liquids, liquefied petroleum gases (LPG) or compressed gas cylinders they are responsible for providing safe storage for these when they are not in use.

Subcontractors are responsible for providing, maintaining and enforcing the use of any personal protective equipment needed by persons working for them. Where the use of specialist equipment the subcontractor is responsible for providing copies of training certificates for all persons that will use such equipment.

Unless agreed in writing beforehand, subcontractors are responsible for ensuring that persons working for them have access to suitable first aid arrangements.

Unless agreed in writing beforehand, subcontractors are responsible for deciding for the safe disposal of any waste arising from their work, in accordance with current legislative requirements.

We reserve the right to order off the premises any subcontractor:

- Not complying with the requirements of this Health and Safety Management System.
- Not complying with risk assessments and method statements.
- Not complying with our rules.
- Not wearing the required personal protective equipment.
- Working in a manner considered to put the health and safety of any person at risk.

All subcontractors engaged by us are to comply with the policies and arrangements.

We reserve the right to submit copies of subcontractors' documents to our external Health and Safety Advisors for evaluation.

Training

Training is essential to help achieve competence. We intend to identify all training needs within and manage this accordingly. It is vital that employees receive suitable and sufficient training enabling them to work safely and avoid unnecessary risk.

At the time of induction and at periodic intervals thereafter we will consider the training needs of employees and organise appropriate training. We will provide the necessary time, funding, and resources to accomplish any training needs that are deemed necessary.

All new starters will be subject to our induction process prior to starting work. The induction process is designed to help new employees understand our fundamental safety arrangements. This will involve welfare, fire, and general safety awareness training. Additional training sessions on the key mandatory disciplines will be completed and recorded. Toolbox talks and specific job training for equipment and tasks will be assessed and completed. Shadowing and monitoring techniques will be used.

Following completion of initial induction training, a training needs evaluation will be conducted appropriate to the job and activities each person is likely to participate in. Training, instruction and supervision will then be organised to help safely integrate the employee into our workplace and activities.

To help us manage training, we will maintain records of training competencies. The records will be periodically reviewed to ensure competencies are achieved and maintained; this may involve refresher training for certain disciplines.

We will complete the training needs analysis and review this periodically.

Anyone undertaking training must themselves be 'competent' as defined in law, this means they are both experienced and qualified and aware of the legal requirements and best practice standards associated with the equipment or tasks being undertaken.

External certification from an accredited body is therefore going to provide the best training and defence in law, should we need to defend the training or competence of employees following an incident or accident.

Where training has been given by an employee with no qualifications but some experience, we are far less likely to be able to demonstrate competence to insurers or enforcement authorities.

We will decide what training can be undertaken 'in-house' and what requires external delivery.

Employee Rules

The following set of rules applies to all employees that work with us. In the interests of health and safety it is important that employees cooperate with us and follow these rules.

Employees are responsible for the safety of themselves and that of others. We will ensure that rules have been communicated and are enforced.

Ignorance or breach of any safety arrangements we have introduced may lead to disciplinary action up to and including summary dismissal for gross misconduct.

General work procedures and rules - employees are to:

- Understand their responsibilities as an employee and comply with any rules and procedures that apply to them.
- Not use equipment until they have been provided with the necessary training and authority for use.
- Make full use of any guards and safety devices.
- Not operate any equipment if under the influence of drugs or alcohol.
- Not willingly causing damage to any work equipment.
- Use any personal protective equipment we provide and deem necessary for specific tasks.
- Use suitable footwear.
- Not endanger their own safety or the safety of others.
- Help achieve and maintain high standards of housekeeping.
- Not interfere with any safety arrangements or equipment we provide.
- Observe the total no smoking policy.
- Only use a mobile phone when it is safe to do so, employees are not permitted to use mobile phones when operating machinery.
- Not bring any personal electrical devices into work without permission.
- Report any faults or unsafe conditions.

Personal health - employees are to:

- Inform us of an injury, condition or illness that may affect their ability to conduct work safely or affect the safety of others.
- Inform us if they are taking prescribed drugs or medicines that may affect their performance at work.
- Report any incident, injury, or ill health they believe has been caused at work.
- Inform us of any illness or condition that they believe could be affected further because of our work.
- Ensure any injuries or wounds receive appropriate attention.

Fire safety - employees are to:

- Be familiar with and follow our fire safety procedures.
- Cooperate with us and participate in fire safety drills.
- Not misuse or interfere with any portable fire fighting equipment or any other fire safety devices.
- Not obstruct any escape routes or exits.

Drugs and alcohol - employees are to:

- Inform us if they have personal issues with drugs or alcohol.
- Not under any circumstances attend work if you are experiencing the effects of alcohol or illegal drugs.
- Not under any circumstances consume alcohol or use illegal drugs whilst at work.

Gross misconduct:

We expect employees to act responsibly at work and comply with our safety policies, rules and procedures. Failure to act responsibly may result with disciplinary action procedures being enforced ultimately leading to dismissal for acts of gross misconduct.

Examples of reasons for dismissal are as follows:

- Failure to comply with risk assessments and safe systems of work.
- Wilfully causing damage to work equipment.
- Wilfully interfering with safety devices or equipment including (but not limited to):
 - Fire safety equipment.
 - Removal of safety guards.
 - Using company equipment without due care and attention, including driving at excessive speeds.
 - Safety signs and instructions.
- Smoking in no smoking areas.
- Misuse of hazardous substances.
- Act of abuse or violence.

Key Holders:

When routinely unlocking and securing the building, or accessing the building out of hours, key holders are to consider their safety from the risk of violence, either from persons within the premises or following a break in, or where there could be a risk from live services, fire or damaged property.

Key holders are instructed not to attempt to enter the building alone if:

- There are signs of a break in i.e. forced entry, broken locks or glass.
- The alarm is sounding fire or intruder.
- They otherwise suspect there may be someone else in the premises.

The key holder is to delay entry until escorted by the police, service contractor or other employees. In all cases employees are to proceed with caution.

Use of Air Conditioning Units

We have a responsibility to ensure that the air conditioning units do not release harmful emissions into the air.

Air conditioning units are an important mechanical aid in making the workplace more comfortable when working in hot conditions. They also reduce the likelihood of windows being left open overnight and less chance of compromising our security.

We have a duty to maintain our air conditioning units. Air conditioning units will be regularly cleaned and properly cleaned to ensure that they remain in a good working order. We will also ensure that we regularly service and maintain our air conditioning units and/or refrigeration units.

Air conditioning units contain filters that purify the air reducing the likelihood of the spread of flu and colds. However, we recognise that failure to maintain the equipment can cause viruses and bacteria to be circulated in the air leading to a cause of illness.

Many air conditioning units contain hydrofluorocarbons, and they are a type of fluorinated greenhouse gas (F gas). We are responsible for ensuring that our leakage detection systems are inspected on an annual basis. We will maintain a checking routine to ensure that we meet our legal obligations.

We have a responsibility to prevent the leakage of F gases and if we identify a leakage of F gas, we will ensure that we appoint a registered FGAS engineer.

Vibration - Hand-Arm

Our aim is to control the risks from Hand-Arm Vibration Syndrome (HAVS) and Carpal Tunnel Syndrome (CTS). Hand-arm vibration is vibration transmitted into the hands and arms when using hand-held powered work equipment. We recognise that continuous work processes of exposure to vibration will lead to the potential development of HAVS or CTS.

We have a duty to assess the risks to health from exposure to continuous levels of vibration and determine the control measures needed. To manage vibration, we will ensure that:

- Daily Exposure Action Value of 2.5m/s² A(8) is not exceeded; and
- Daily Exposure Limit Value of 5m/s² A(8) is not exceeded.
- When equipment is supplied to us, we obtain the information on the vibration emission. To help us manage vibration emission we will keep an inventory of the equipment and its vibration emission.
- We monitor exposure to HAVS and CTS through appropriate health surveillance, where levels indicate.
- Employees are informed, trained, and instructed on the risks and precautions to be taken to protect themselves from developing HAVS and CTS.
- We use the most appropriate equipment for the job.
- Maintain tools to the manufacturer's specifications to avoid worsening vibration.
- Employees are aware not to use tools that would make the problem worse.
- We introduce effective control measures to ensure level of exposure to HAVS and CTS are eliminated or reduced as far as is reasonable.
- When we buy new equipment we assess their vibration level and take this into consideration when selecting equipment.
- We provide the relevant personal protective clothing.
- All employees are aware of the symptoms of HAVS and CTS and to report to The Directors when symptoms develop.

We recommend that if employees use hand-held powered work equipment for long periods, they break up the time spent working with it, by working away from the tool for 10 minutes.

If employees experience any issues with Hand-Arm Vibration, then they are informed to advise their GP and the Directors. They are instructed not to ignore the symptoms of Hand-Arm Vibration Syndrome.

Visitors

The control of visitors and contractors is essential. We have in place a reliable system to prevent unauthorised persons entering.

It is vital that we know who is on our premises at any time for the safety of everyone, enabling us to confirm to the fire and rescue service that all persons have evacuated in an emergency such as a fire. Therefore, visitors will be asked to sign a register upon their arrival.

All accidents are to be reported and details recorded. Investigations will be arranged where necessary to help prevent a repeat similar occurrence.

It is important that visitors and contractors park their vehicles responsibly. Vehicles are not to be parked making access difficult for emergency vehicles or others. No vehicle is to be left obstructing pedestrian routes, emergency exits, or other facilities designed to facilitate health, safety or fire arrangements.

Equipment and personal protective equipment may be required to be worn, including Hi-Viz, and safety shoes as a minimum. Gloves, eye protection and hearing protection are often also mandated. Requirements are discussed during inductions. Pedestrians are to keep to designated walkways and visitors are to be inducted by their host.

We have a contracting vetting system in place, and this is to be followed. Inductions will cover topics such as:

- Fire safety arrangements.
- First aid facilities.
- Welfare arrangements and facilities.
- Details of our policies and procedures relative to any work taking place.
- Any permit to work system in operation or required.
- Hazards.

Safety standards are to be reviewed regularly as and where contractors fail to maintain standards, suitable action will be taken to redress this.

Vulnerable Adults

We recognise that we owe a duty of care to adults that are vulnerable or at risk. We aim to ensure that vulnerable adults have a positive experience and that they never experience abuse of any kind.

We recognise the rights of the individual to lead an independent life based on selfdetermination and personal choice. Vulnerable adults have the same rights as individuals so have the right to be left alone and free from public attention into their own affairs. We also recognise the uniqueness of their personality and their right to have their personal needs met in a way that respects their beliefs and fundamental principles. Vulnerable adults have the right to make their own choices and realise whatever personal aspirations and abilities they may have in all aspects of their daily lives.

When responding to suspicions, allegations or incidents of abuse involving vulnerable adults, we will respond as the situation demands, involving family and friends if necessary. We acknowledge their right to protect themselves from harm and where possible live in the environment of their choice. We encourage the vulnerable adult to comment and complain, if necessary, about the service they receive.

A "Vulnerable adult" is an adult (a person aged 18 or over) who requires care services. This may be because of disability, mental health, age, illness, those who are unable to take care of themselves and those who need to be protected from significant harm or exploitation. This includes:

- People with learning disabilities.
- Mental health problems.
- Older people.
- Disabled people.

Anyone whose situation may be complicated by:

- Physical frailty.
- Chronic illness.
- Sensory impairment.
- Challenging behaviour.
- Social problems.
- Emotional problems.
- Poverty.
- Substance abuse.

The individual has the right to be left alone or undisturbed and free from intrusion or public attention into their own affairs. We recognise the value of people regardless of circumstances by respecting their uniqueness and personal needs and treating people with respect.

The opportunity to act without reference to another person, including a willingness to incur a degree of personal risk is important, as is the opportunity to select independently from a range of options. To maintain all their entitlements and realise their personal aspirations and abilities in all aspects of daily life.

"Abuse is a violation of an individual's human and civil rights by any other person or persons".

Abuse of a vulnerable adult can consist of a single act or repeated acts over time. It can result from failure to undertake action or appropriate care tasks. It may be physical, psychological, sexual, financial or neglect. Abuse can occur in any relationship and can result in exploitation of the individual or significant harm.

It may be perpetrated by anyone who has power over the person or where the result is a rigid/oppressive regime or result of persistently poor care. This includes hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.

Possible indicators are:

- Multiple bruising not consistent with the explanation given e.g. a fall.
- Cowering and flinching.
- Black eyes, marks resulting from a slap and/or kick, other unexplained bruising.
- Abrasions, especially around the neck, wrists and/or ankles.
- Unexplained burns, especially on the back of the hands.
- Scalds, especially with a well-defined edge from immersion in water.
- Hair loss in one area- scalp sore to touch.
- Frequent minor accidents without seeking medical help.
- Unusually sleepy or docile. Tendency to flounder or slip over.
- Unexplained fractures.
- Malnutrition, ulcers, bed sores and sores due to lack of care for incontinence.
- Frequent 'hopping' from one GP to another or from one care agency to another.

This includes threats of harm or abandonment, humiliation, verbal or racial abuse, isolation or withdrawal from services or supportive networks.

Possible indicators are:

- Disturbed sleep or tendency to withdraw to a room or to bed.
- Loss of appetite or overeating especially at inappropriate times.
- Anxiety, confusion, or general resignation.
- Extreme submissiveness or dependency in contrast with known capacity.
- Sharp changes in behaviour in the presence of certain persons.
- Excessive or inappropriate craving for attention.
- Extreme self-abusive behaviour especially self-mutilation, head banging, hand biting.
- Loss of weight without apparent loss of appetite.
- Loss of confidence.

Sexual abuse includes rape and sexual assault or sexual acts to which the vulnerable adult has not or could not consent and/or was pressured into consenting.

Possible indicators are:

- Unexplained and uncharacteristic changes in behaviour.
- New tendency to withdraw and spend time in isolation.
- Recent development to openly display sexual behaviour/or use language including inappropriate dressing and masturbation.
- Deliberate self-harm.
- Incontinence/ bedwetting.
- Irregular or disturbed sleep patterns.
- Difficulty in walking.
- Unexplained soreness around the genital area.
- Repeated urinary tract infections.
- Bruising or bleeding in the genital or rectal area.
- Excessive washing.
- 'Love bites'.
- Torn or stained underclothing especially with blood or semen.
- Sexually transmitted disease or pregnancy.

Financial abuse includes theft, fraud, pressure around wills, property or inheritance, misuse, or misappropriation of benefits.

Possible indicators are:

- Unexplained or sudden inability to pay bills.
- Unexplained or sudden withdrawal of money from accounts.
- Contrast between known income or capital and unnecessarily poor living conditions especially where this has developed recently.
- Personal possessions of value go missing from the home without the satisfactory explanation.
- Someone has taken responsibility for paying rent, bills, buying food etc. but clearly not doing so.
- Unusual interest taken by relative, friend, neighbour or other in financial assets especially if little concern is shown in other matters.
- Next of kin refuses to follow advice regarding control property via Court of Protection or through securing enduring power of attorney but insists upon informal arrangements.
- Where care services including residential care are refused under clear pressure from family or other potential inheritors.
- Unusual purchases unrelated to the known interests of the vulnerable adult e.g. purchases of fashionable clothes, expensive make-up, food and holidays.

Neglect includes failure to access medical care or services, negligence in the face of risk-taking, failure to give prescribed medication, poor nutrition or lack of heating.

Possible indicators are:

- Poor hygiene and cleanliness of a person who needs assistance with personal care.
- Unkempt or unsuitable clothing for the weather condition.
- Untreated physical illness.
- Dehydration/weight loss/malnutrition.
- Repeated infections.
- Repeated/unexplained falls/trips.
- Pressure sores.
- Inadequate heating or lighting available.
- Furnishing, carpeting, noticeably shabbier or of poorer quality in their rooms compared with those in other rooms in the house.
- Incontinence issues not addressed e.g. odour has developed on clothing and/or furnishings.
- Clear failure to ensure the taking of medication appropriately.
- Inconsistent or reluctant contact with the health or social—care agencies.
- Failure to ensure appropriate privacy and dignity in personal living conditions e.g. immobile person given bucket to go to toilet in.
- Refusal of the right to use external facilities or access other care services especially if a cost is involved.
- Lack of safety equipment/being used following recommendation.

Everyone has a responsibility to report any allegations or suspicions of abuse, or potential abuse of a vulnerable adult immediately.

This includes abuse carried out by someone else with whom the vulnerable adult has a personal or professional relationship.

Employees who believe another employee acted inappropriately is to report this.

If the vulnerable adult is in immediate danger, action will be taken to ensure their safety including calling the appropriate emergency services.

If an employee believes a crime has been committed, then police should be contacted immediately. Care will be taken to preserve evidence in cases involving sexual or physical abuse.

Employees are not to alert or confront the alleged abuser.

Employees are to note what they have seen and report the written account as soon as possible.

All employees are expected to cooperate fully in any adult protection investigation/assessment and comply with any recommendations of an adult protection plan.

Welfare and Working Environment

We aim to provide a safe working environment and to meet the welfare needs of all employees. To help us maintain the standards we strive to achieve, we expect employees to cooperate with us and follow our rules, policies and procedures.

Lighting is periodically assessed in our work areas to ensure the correct amount of natural light or illumination is available for working activities or moving around. Insufficient or too much lighting can have a detrimental effect on work, safety and health.

Emergency lighting is provided to facilitate the safe evacuation in the event of an incident occurring.

We understand it is important to maintain a reasonable working temperature and circulation of air. There are no set legal temperatures; however, guidance is available which sets out 'acceptable' lower limits of 16°C and 13°C, respectively. We will establish reasonable conditions and monitor as and when issues arise with thermometers.

We have considered the needs of employees and others and have provided a suitable quantity of toilets and washing facilities. Hot and cold running water is provided in sanitary conveniences along with suitable hand drying means.

It is important that employees take breaks, particularly if they are undertaking detailed and high concentration working periods. There are facilities to make hot and cold drinks. We request employees, in the interests of hygiene, that this area is kept clean and tidy.

Sources for obtaining safe drinking water are provided. These will be identified at the time of induction for new employees.

Window Restrictors

Restrictors are fitted to prevent persons falling from windows.

It is our duty to ensure, so far as is reasonable, the health, safety and welfare at work of all employees. It is also our duty to conduct our undertaking in such a way as to ensure, so far as is reasonable, persons not in our employment who may be affected thereby are not exposed to risks to their health and safety. The care and controls in respect to vulnerable persons is expected to be higher than for the general population.

We are required to undertake the fitting of restrictors which limit the opening to 100mm in windows fitted above ground floor (where they are within 800mm of internal floor level).

Risk assessments are required to be carried out on vulnerable persons and reasonable steps taken to protect them. It will be explained to all employees during induction and refresher training that people do fall from unprotected windows and that we have a duty to protect them from so doing.

Winter Conditions

Whilst we make every effort to ensure that temperatures within internal work areas are reasonable, it is foreseeable that heating systems may fail due to breakdown or power disruption. Should this occur, employees are to utilise portable heaters where possible and put on additional clothing as a temporary measure whilst a solution is sought.

In the event of snowfall within the commuting routes of employees, we will monitor weather conditions and release employees early if necessary to avoid them being trapped at work.

Unless directed not to attend, employees are expected to make reasonable efforts to come to work without taking personal risks. Travel warnings are to be heeded.

We are responsible for ensuring that additional communications and other precautions are taken as necessary to safeguard those who are lone working.

If due to low employee numbers, our first aiders are not available, we will seek the role of an appointed person.

Procedures are implemented in accordance with our slips and trips and falls policy to control the additional slipping hazards presented by the weather. All external walkways and steps are regularly cleared of snow and gritted to reduce ice. We will follow the government's snow code in our approach to clearing snow and ice.

We will also pay attention to building entrance areas to minimise the risks from wet floors. Employees are encouraged to wear footwear with a good tread when walking outside.

Employees who are required to drive for work are to ensure that they are planning their journey in advance, allowing extra time in preparation of sudden weather changes. Drivers are to ensure during the winter months that:

- Their fluid levels in the vehicle are topped up.
- They have a de-icer or ice scraper in the vehicle.
- They carry a hot drink in a flask.
- They carry snacks.
- They have a high visibility jacket/vest.
- They have spare warm clothes.
- They have a mobile phone fully charged, including an in-car charger.
- They have a first aid kit.

Employees who are required to work outside are provided with facilities and increased rest breaks to allow them to warm up. We encourage the drinking of warm fluids such as hot drinks. Employees working outside are to ensure that they have the appropriate personal protective clothing on which includes gloves, thermals, hat, coat, safety footwear and high visibility vest if applicable, to prevent exposure to cold weather conditions.

Employees who are exposed to cold temperatures for a long period of time can lead to an increased risk of accidents occurring. Therefore, we will assess employees working outside in cold temperatures and implement as far as reasonable control measures.

Work Equipment & Access Equipment

The term work equipment is used to describe machines, tools, installations, or equipment used for completing work whether owned or on loan/hire. The term is broad and applies to any work equipment we use.

We acknowledge our duties as stipulated in law and will satisfy these duties by adopting the following procedures:

A needs analysis will be conducted before acquiring any work equipment taking into consideration many aspects including the task the equipment is required to perform, where it is to be used, anticipated volume of work, operators training needs, safety etc.

Equipment will only be sourced from reputable dealers. Safety devices fitted such as emergency stop buttons, guards etc. will comply with current standards for machinery.

A risk assessment will be conducted before use of any new work equipment commences. The outcome of the assessment will help determine if the equipment is safe for use or if additional control measures are required for user safety and for the safety of others.

Training will be provided for employees and anyone else authorised to use our work equipment. Training and supervision will continue until such a time when a user is deemed competent, and supervision is no longer needed.

All training will be overseen, and training records maintained.

All work equipment is subject to wear and the possible occurrence of faults, it is therefore necessary that we monitor and maintain equipment regularly. Manufacturer's recommendations will be followed for maintenance and inspection frequencies unless the scope of our work dictates these need to be changed, we will, if necessary, introduce our own maintenance and inspection program and regime.

We will ensure any statutory inspections or examinations are completed on time.

We appreciate that preventative maintenance is better than equipment failure; consequently, we rely on the Directors and managers and users of our work equipment to follow the adopted maintenance and inspection regime we decide upon.

Some maintenance tasks will be beyond the capability of employees, this we understand, and it is our responsibility to identify such tasks and to appoint suitable contractors to conduct or assist with tasks.

Contractors engaged by us to undertake work will also be vetted for training, competency, and maintenance of their own work equipment.

We expect all work equipment users to conduct a before use check to confirm equipment is safe for use. If problems are identified these are to be reported to ensure a repair is arranged. All faulty or damaged equipment must not be used until a suitable repair has been completed.

To help manage maintenance, inspection, and repair of our equipment we will record all events and maintain documentation to support this. Any work conducted by contractors will be included.

Employees are not to use work equipment if:

- They have not received appropriate training.
- They are unfamiliar with the operation.
- The equipment is faulty, or they identify a fault.
- There is insufficient room around the equipment to work safely.
- Safety devices such as guards are not in place or are damaged.
- They require personal protective equipment, and none is available.

Work Related Stress

We have a responsibility for the health, safety and welfare of our employees and recognise that their well-being is important to its success. The prevention and effective management of stress is our responsibility.

We believe that all employees have the right to expect that their working conditions and relationships will be such that they do not result in prolonged stress symptoms.

We are committed to:

- Preventing, in so far as is reasonable, employee stress resulting from work practices, excessive workloads or interpersonal relationships.
- Where work-related stress does occur, taking steps to minimise the impact of this stress on individuals.
- Providing training and support to help employees understand and recognise the nature, causes and management of work-related stress and to prevent or minimise work-related stress.

We will continuously assess and monitor the work-related stress levels of our employees through:

- Formal and informal supervision of employees.
- Formal performance appraisal of employees.
- Formal and informal meetings and discussions with employees.
- Formal and informal performance conduct and absence management.
- Meetings and discussions with employees.
- Investigation of comments and complaints from employees.
- Investigation of accidents, injuries, diseases, dangerous occurrences and other incidents.

If the work-related stress levels of one or more employees appear to be rising, we will take appropriate action.

We will provide reasonable support to all employees who are absent from work due to work-related stress, to assist their return to work.

Employees have a responsibility for their own work-related stress levels and are instructed to try to help themselves and their colleagues wherever possible. Employees are encouraged to make suggestions for reducing work-related stress.

Employees should discuss any problems if it is a cause of stress.

Normally, employees try to resolve problems informally. If the result of an informal approach is unsatisfactory, employees can raise the issue formally. Employees are to accept opportunities for counselling etc. when this is recommended.

Recognising the symptoms of stress in others:

- Increases in overall sickness absence, particularly frequent short-term sickness absence.
- Poor work performance: less output, lower quality, poor decision-making.
- Changes in relationships at work: conflict between colleagues.
- Changes in employee attitude and behaviour: loss of motivation or commitment, poor timekeeping, working longer hours but with diminishing effectiveness.
- Lack of enthusiasm.
- High accident rates.

In themselves

- :
- Tiredness, aching muscles, disturbed sleep.
- Loss of appetite, indigestion, stomach problems.
- Loss of sexual drive.
- Dependence on alcohol or drugs, excessive smoking.
- Headaches.
- Inability to relax.
- A sense of being out of control.
- Difficulty retaining information.
- Poor concentration and indecisiveness.
- Worrying.
- Increased irritability.
- Increased incidence of frequent short-term sickness absence.
- Change in attitudes to work and colleagues.
- Feeling anxious or depressed.

Some of these symptoms may not be stress related but could indicate a more serious underlying condition.

Work Related Violence

A violent incident is any incident in which a person is abused, threatened or assaulted in circumstances relating to work. We consider that work-related violence is unacceptable. Our aim is to reduce it to the lowest reasonable level, the likelihood of a person being exposed to violence and aggression while at work.

We will identify all activities where there is the potential for work-related violence and will ensure that the risk assessments for these activities consider the hazards of violence and aggression. This will include activities involving direct contact with members of the public.

Where employees are exposed to risks of work-related violence, we will inform them of the findings of the relevant risk assessments, and we will seek to reduce these risks to the lowest reasonable levels by implementing engineered and procedural control measures. Where we identify that training and instruction will help to reduce risks, employees will be provided with such training. This will include, but will not be limited to:

- How to identify potential incidents of violence before they happen.
- How to prevent incidents from developing.
- Appropriate behaviour for providing non-confrontational services.
- Actions to take in the event of a violent incident.

If employees feel that they are losing control of a situation or that the other person is becoming aggressive, they are instructed to try to withdraw and obtain assistance. The type of assistance provided will depend on the situation. If we consider that it is the best way to calm a situation, an aggressive person will be asked to leave the premises.

If it is believed that an aggressor is in possession of an offensive weapon, then the police will be called immediately (preferably unknown to the aggressor). Employees are instructed not to attempt to disarm an assailant unless personal injury is imminent. They are not to pick up an object to use as a weapon except in self-defence.

Safety is paramount and entirely outweighs the value of any money or property that could be stolen. Employees are not expected to foil a raid or to try to prevent theft, if doing so would put any person's life in danger.

Violence or the fear of violence from can seriously impact on working and home life and can cause depression and stress. Where the risk of violence has been identified employees are to follow the advice and instructions as required. Violence 'triggers' can very often be avoided with good training and preparation. If employees experience a violent incident, they are instructed to report it so other employees are made aware, and changes can be made in the support offered.

All incidents involving work-related violence or aggression will be recorded. This applies to incidents where there are no injuries as well as to those where injuries occur.

Working at Height

We recognise the dangers of working at height and acknowledge our duties. Employees are instructed to understand that working at height is one of the biggest causes of major injuries and fatalities every year. Therefore, wherever possible we will avoid the need to work at height and where we must, we will ensure it is properly risk assessed and follows a logical and prescribed hierarchical approach.

There are many hazards involved with working at height, most of which are simple to avoid, they involve:

- The correct use of steps, ladders and 'step up' stools.
- Not climbing on chairs or tables.
- Not overreaching when using equipment.

The 'hierarchical approach' is the step-by-step process of managing risk. In summary, this involves:

- Preventing falls by using safe and correct equipment.
- Reducing the distance and consequence of any potential fall.
- Providing good safe access to get to where a person needs to go.
- Checking the equipment, not ignoring defective or damaged kit.
- Not overloading or overreaching.
- Protecting the area below.
- Planning for emergencies or evacuations.

All employees required to work at height will undergo training applicable to the method selected for working at height and for the environment in which the work occurs. Training will be periodically repeated to help maintain skills and competence. Information relating to each task undertaken by us and along with a comprehensive list of associated hazards, general and common to the work location will be conveyed prior to the commencement of each activity.

We understand that we must do all that is necessary to prevent anyone from falling. Employees and others required to work at height are to follow safe working practices. When working at height we will appoint a competent person to take charge, they will prepare a method statement and risk assessment for the work. Safety procedures are to be understood by all employees involved and be in place prior to starting any work.

Working at height assessments and controls are also required where there is a risk of falls at ground level. Before undertaking any significant work or activities in these areas, safety briefings are required and suitable controls will be in place.

Employees using a stepladder to carry out a work at height task are instructed to:

- Check for signs of obvious damage, such as big dents, loose rungs or fittings and if noted, not to use them.
- Check all four step ladder feet are in touch with the ground, rubber feet attached, and the steps are level.
- Only carry light materials and tools and DON'T overreach.
 - Do not stand and work on the top three steps unless there is a suitable handhold. (Includes the top platform).
 - Ensure any locking devices are engaged.
 - Ask a colleague to steady the steps and pass items up or down.
 - Not attempt the task if they are worried or uncertain.
 - Try to position the stepladder to face the work activity and not side on. However, there may be times when space does not allow for this.
 - Try to avoid work that imposes side loading.
 - If unavoidable, they are to ensure that the steps are held by a colleague or consider waiting for others to assist them. points of contact at the working position e.g. 2 feet and 1 hand

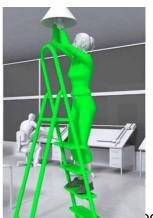
or when both hands required, 2 feet and the body or belly or 2 feet and knees.

• When deciding if it is safe to use no hands on the ladder, whether it is light work, whether it avoids side loading, whether it avoids overreaching, whether the stepladder can be tied and whether a handhold is still available to steady themselves before and after the task.

Using a step up stool:

- Employees are to ensure to wear sensible shoes, not heels or flip flops.
- Employees are instructed not to overreach or twist or stretch up to tip toes.
- Employees are instructed to be sure to ensure the step; stool is undamaged before use.





Workplace Housekeeping

We will consider housekeeping issues on a day-to-day basis and all employees have a general responsibility to keep the work areas tidy and report hazards.

Effective housekeeping can eliminate some hazards and help get a job done safely and properly. Poor housekeeping can frequently contribute to accidents by hiding hazards that cause injuries. If the sight of paper, debris, clutter, and spills is accepted as normal, then other more serious health and safety hazards may be taken for granted.

Housekeeping is not just cleanliness. It includes keeping work areas neat and orderly, maintaining corridors and floors free of slip and trip hazards, and removing waste materials and other fire hazards. It also requires paying attention to important details such as the layout of the whole workplace, aisle marking, the adequacy of storage facilities and maintenance. Good housekeeping is also a basic part of accident and fire prevention.

Effective housekeeping is an on-going operation: it is not a hit-and-miss clean up done occasionally. Periodic "panic" clean ups are costly and ineffective in reducing accidents.

We will adopt a "clean as you go" policy. Poor housekeeping can be a cause of accidents, such as:

- Tripping over loose objects.
- Being hit by falling objects.
- Slipping on greasy, wet, or dirty surfaces.
- Striking against projecting, poorly stacked items or misplaced material.
- Cutting, puncturing, or slashing the skin of hands or other parts of the body on projecting nails, wire, or steel strapping.

To avoid these hazards, we will maintain order throughout a workday. Although this effort requires a great deal of management and planning, the benefits are many.

Effective housekeeping results in:

- Reduced handling to ease the flow of materials.
- Fewer tripping and slipping accidents in clutter-free and spill-free areas.
- Decreased fire hazards.
- Lower worker exposures to hazardous substances.
- Better control of tools and materials, including inventory and supplies.
- More efficient equipment clean-up and maintenance.
- Better hygienic conditions leading to improved health.
- More effective use of space.
- Reduced property damage by improving preventive maintenance.
- Less caretaker cleaning work.
- Improved morale.
- Improved productivity.

A good housekeeping program plans and manages the orderly storage and movement of materials from point of entry to exit. It includes a material flow plan to ensure minimal handling. The plan also ensures that areas are not used as storage areas by having employees move materials to and from areas as needed. Part of the plan includes investing in extra bins and more frequent disposal.

The costs of this investment will be offset by the elimination of repeated handling of the same material and more effective use of employees' time. Often, ineffective or insufficient storage planning results in materials being handled and stored in hazardous ways. Knowing the layout and the movement of materials throughout will help to plan procedures.

Worker training is an essential part of any good housekeeping program. Employees will be informed of how to work safely with the products they use. They also will be informed of how to protect other employees such as by posting signs (e.g., "Wet - Slippery Floor") and reporting any unusual conditions.

Housekeeping order is "maintained" not "achieved." Cleaning and organisation will be done regularly, not just at the end of the shift. Integrating housekeeping into jobs will help ensure this is done. A good housekeeping program identifies and assigns responsibilities for the following:

- Day-to-day clean up.
- Waste disposal.
- Removal of unused materials.
- Inspection to ensure clean-up is complete.

Employees are instructed to not forget out-of-the-way places that would otherwise be overlooked. The orderly arrangement of operations, tools, equipment, and supplies is an important part of a good housekeeping program.

The final addition to any housekeeping program is inspection. It is the only way to check for deficiencies in the program so that changes can be made.

Workplace Transport

Workplace transport related accidents are a major cause of fatalities and a significant cause of serious injuries, and we have a duty to protect our employees and others.

It is our policy to:

- Ensure that our employees who drive vehicles are instructed and trained and hold appropriate driving licences.
- Review arrangements and procedures to ensure pedestrian safety and pedestrian/vehicle segregation where possible.
- Assess the risks created by workplace transport.
- Ensure that risk assessments are completed.
- Maintain traffic routes.
- Ensure arrangements are established for the safe reversing of vehicles.
- Review unloading and loading operations and have arrangements in place to prevent persons falling from vehicles or any other loading areas within our control.
- It is the responsibility of the driver to check the load on the vehicle is secured prior to departure.
- Inform, instruct, and train employees regarding safe movement of transport and provide safe procedures for the loading and unloading of vehicles.

Young Persons

We recognise our responsibilities, and we will carry out a specific risk assessment for young persons (those under 18), considering:

- Inexperience, lack of awareness of risks and immaturity of young people.
- The workplace and equipment.
- The nature and degree of exposure to harm.
- The organisation of processes and activities.
- Training and competence.

When employing a young person or accepting a work placement, we will:

- Decide to make an offer of employment to a person under the age of 18; we will contact our insurance company to ensure that our Employers' Liability Insurance policy covers us for this type of employment.
- Complete a risk assessment considering specific factors such as immaturity, inexperience and lack of awareness, medical conditions and physical and learning disabilities of the young person or child.
- Look back at our accident and ill health records as these often help to identify the less obvious hazards.
- Contact the local authority to apply for a work permit if the child is under compulsory school leaving age.
- Think about long-term health hazards, such as high noise levels or exposure to harmful substances, as well as more common site hazards.

We will consider whether:

- A young person or child should be undertaking the task.
- The work is beyond their physical or psychological capacity.
- The work involves exposure to harmful substances which may be toxic, carcinogenic, potentially causing heritable genetic damage or harm to an unborn child, or which in any other way might chronically affect human health.
- There is a risk from extreme cold or heat, noise, or vibration.

When controlling risks, we will apply the principles below, if possible, in the following order:

- Prevent access to the hazard, for example, by prohibiting access by the young person or child.
- Organise work to reduce exposure to the hazard, consider task rotation.
- Provide increased or full-time supervision for the young person or child.
- Issue personal protective equipment that is intended specifically for young people or children as adult equipment may not be a true fit and consequently be ineffective at controlling the risk.
- Explain welfare facilities, for example, first aid and washing facilities for the removal of contamination.

We will remember to prioritise and tackle the most important things first.

We will share the findings of the risk assessments with guardians where appropriate.

Where a person is under the minimum school leaving age, the findings of risk assessments will be brought to the attention of the child's parents or guardians and explained in full.

Training will include the basic induction training offered to all employees. In addition, we will identify and make the young person or child aware of the specific issues that might affect them. Emphasis will also be required on issues such as horseplay and practical jokes.

An introduction is required to the employee who will be supervising the young person or child. We will ensure that good communication is maintained with any young person or child and that, where necessary, any conversation about health matters are held in private and with a parent, guardian or other responsible adult.



An Alternative approach to Education

Chapter 4. Advice and Information

Health and Safety Advice

It is important that we can obtain advice, guidance and information regarding safety; a firm understanding of our duties and responsibilities will help us act accordingly and fulfil any statutory requirements we need to comply with.

Wirehouse Employer Services Limited provides us with competent health and safety advice and support. They are our nominated health and safety service provider. They are not responsible for the day to day management of health and safety that applies to us, employees have been nominated and duties assigned to ensure we meet any statutory requirements imposed on us.

Services available to authorised employees include the following:

- Wirehouse Employer Services online Employees with authorisation and access can logon to the Wirehouse webpages. Information available includes documentation and guidance on key safety issues such as risk assessment. In addition, we can also gain access to an electronic copy of our Health and Safety Management System.
- 24-Hour Advice Line We have arranged for 24-hour support using the Wirehouse Employer Services Health & Safety Advice Line. A safety consultant will handle your call and respond to your query.

Please note this service is restricted to authorised employees only.

The Health and Safety Executive offers advice, information and guidance. A variety of safety regulations are available and can be downloaded from their website.

Internet access:

General Guidance	
http://www.hse.gov.uk/	Use the search engine to locate guidance.
http://www.hse.gov.uk/pubns/priced	General guidance on safety management
/hsg65.pdf	systems.
http://www.hse.gov.uk/work-at-	Pages of guidance on issues around working
height/index.htm	at height.
http://www.hse.gov.uk/work-at-	Links to safe use of ladders and steps.
height/using-ladders-safely.htm	
http://www.hse.gov.uk/toolbox/elect	Information on electrical safety.
rical.htm	
http://www.hse.gov.uk/pubns/indg3	A brief guide on how to engage and manage
<u>68.pdf</u>	contractors.
http://www.hse.gov.uk/pubns/manli	Industry specific guidance on manual
nde.htm	handling.
http://www.hse.gov.uk/legionnaires/	Legionella (water safety) issues explained.
workplace-risks.htm	
http://www.hse.gov.uk/pubns/indg21	First aid requirements explained.
4.pdf	
http://www.hse.gov.uk/risk/controlli	Risk assessment explained – links to HSE
ng-risks.htm	examples.
http://www.hse.gov.uk/work-	Guide to managing work equipment –
equipment-machinery/puwer.htm	including machinery and guarding issues.
http://www.hse.gov.uk/office/	Office safety issues (slips trips, display screen
	home working).
Industry Specific Guides	
http://www.hse.gov.uk/manufacturin	Manufacturing sector information
<u>g/index.htm</u>	
http://www.hse.gov.uk/vibration/hav	Vibration calculator tool
/vibrationcalc.htm	
http://www.hse.gov.uk/pubns/indg3	Occupational noise explained
<u>62.pdf</u>	