

HEALTH AND SAFETY MANAGEMENT SYSTEM

Health and Safety Policy

Merseyside Metal Services Ltd.

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Stockists of non-ferrous, stainless, alloy steels and plastics



AMENDMENTS

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1 INTRODUCTION

1.1 THE COMPANY



Merseyside Metal Services Ltd, a rapidly growing business, is based in Birkenhead since 1974 has been supplying Materials and Plastics to the engineering sectors.

The Company has a stock of 350 tonnes covering over 5000 items including an extensive range of stock of Bronze, Stainless Steel, Brass, Copper, Tool Steel, Carbon Steel and Alloy Steels.

The Company is an approved agent for Quadrant Engineering Plastics (former Polypenco), a global leader in both Engineering and Advanced Engineering Plastic Manufacture.

1.2 HEALTH AND SAFETY MANAGEMENT SYSTEM - MOTIVATORS



There are many reasons why Merseyside Metal Services Ltd should establish an effective Health and Safety Management System. The first reason is to ensure that risks are sensibly and proportionately controlled so as to prevent accidents and injuries.

The Company understands that proportionate Risk Management essentially means that our response and effort to control an identified level of risk presented by our operations should be proportionate to the level that the risk presents.

It is understood that some operations may present lower risks than others and as such will not need an excessive volume of time, effort and resources in controlling those risks.

The Company is aware that there are common assumptions that the Health and Safety Executive (HSE) are responsible for all of the compliance pressures that businesses may feel themselves under and also understands that this is not always the case. The Company is fully aware that the motivators to demonstrate effective management of Health and Safety issues come from many sources.

These motivators have informed why the Company has to develop, and demonstrate, its Health and Safety Management System. This is a "beyond compliance" approach and is critical to demonstrate how Health and safety is integrated into business processes.

Although not an exhaustive list, these motivators are represented in the following diagram.



The Fire and Rescue Service enforce the suitability of fire safety measures.



Insurance Companies require companies to manage health and safety so that their own financial risk is limited. This is reflected in the size of their premiums.



Commercial Clients, as part of their own due diligence, normally wish to see evidence of effective contractor health and safety management.



Pre-Qualification Questionnaires (PQQ), such as Safety Schemes In Procurement (SSIP) facilitate acceptance between competing schemes, such as CHAS, SMAS, Constructionline, etc.



The Police enforce workplace fatalities (along with HSE) as well as other areas of criminality such as substance misuse in the workplace, violence, etc.



Solicitors act on behalf of injured parties wishing to see whether a company has been negligent with respect to civil law.



The Health and Safety Executive (HSE) enforce workplace health and safety legislation.



Local Authorities (LA) enforce health and safety in the retail, wholesale distribution, warehousing, hotel, catering, offices, consumer and leisure industries.

The diagram illustrates many of the motivators that inform the decision to document a comprehensive Health and Safety Management System. Although these motivators do not always have their roots in legal compliance the Company is aware that the issues and requirements have to be addressed in order to operate the businesses successfully.

The Company is aware that addressing these issues can assist in:

- Implementing systems to manage risk in a proportionate manner.
- Avoiding accidents and adverse events.
- Ensuring legal compliance.
- Avoiding criminal prosecution and instances of civil liability.
- Avoiding high staff turnover rates and attracting motivated and skilled staff.
- Operating more economically, efficiently and morally.
- Reducing overheads including reducing insurance premiums.
- Demonstrating Health and Safety competence to Clients and Contractors to assist in contract winning.

1.3 HEALTH AND SAFETY MANAGEMENT SYSTEMS



The HSE publication **HSG 65 Managing for Health and Safety** methodology is followed in order to establish a framework for a Health and Safety Management System of which this Policy is the cornerstone.

HSG65 promotes a simple message that organisations need to manage Health and Safety with the same degree of expertise and to the same standards as other core business activities, if they are to effectively control risks and prevent harm to people.

This is the approach adopted by Merseyside Metal Services Ltd with assistance from our Health, Safety and Environment Advisors – MD Safety Management Limited.



The "Plan, Do, Check Act" framework allows the organisation to identify the key actions needed in each part of the cycle and relate them back, where appropriate, to leadership, management, worker involvement and competence. The framework is based on a plan that is proportionate to the risks as indicated below:



- ✓ An effective Health and Safety Policy sets the strategic direction of the organisation.
- ✓ Planning and coordination of the Policy is essential for the Management System to be effective.



- ✓ Identify the risk profile of the organisation.
- ✓ Coordinate the actions of those responsible for controlling the risks.
- ✓ Implement the Risk Control System (RCS).



- ✓ Monitoring the effectiveness of the Risk Control System is vital to measure performance.
- ✓ Investigating accidents and incidents will help prevent recurrence and improve performance.



- ✓ Regular audit and review will enable confirmation if existing arrangements are still valid.
- ✓ Incorporating results will allow learning lessons for personnel and the organisation.

2 PLAN - HEALTH AND SAFETY POLICY

A Health and Safety Policy is:



A written statement by an employer stating the company's commitment for the protection of the health and safety of Employees and to the public. It is an endorsed commitment by management to its Employees regarding their health and safety.

An effective Health and Safety Policy sets a clear direction for the organisation to follow. The Policy contributes to all aspects of business performance as part of a demonstrable commitment to continuous improvement.

Responsibilities to people and the environment are met in ways that fulfil the spirit and letter of the law.

Stakeholders' expectations in the activity (whether they are shareholders, Employees, or their representatives, Clients or society at large) are satisfied.

There are cost-effective approaches to preserving and developing physical and human resources, which reduce financial losses and liabilities.

An effective management structure and arrangements are in place for delivering the Health and Safety Policy. Staff are motivated and empowered to work safely and to protect their long-term health, not simply to avoid accidents. The arrangements are:

- Underpinned by effective staff involvement and participation.
- Sustained by effective communication and the promotion of competence that allows all Employees to make a responsible and informed contribution to the Health and Safety effort.

There is a shared common understanding of the organisation's vision, values and beliefs. A positive Health and Safety culture is fostered by the visible and active leadership of senior Managers.

Responsibility:

Merseyside Metal Services Ltd is ultimately controlled by its Managing Director – David Thompson. David Thompson is identified as having overall responsibility for Health and Safety and is thus identified as the Director with Responsibility for Health and Safety.

Delegation of Duties:

David Thompson may delegate some Health and Safety duties for day-to-day operations to the Office Manager – Doug Thompson. Doug Thompson is also identified as the Health and Safety Coordinator. The Health and Safety Coordinator may then, in turn delegate some duties to a particular, identified Employee on a daily basis.

Staff Duties

All other Staff, not identified in this Policy, have duties as Employees as laid out in the *Health and Safety at Work etc. Act 1974* and other subordinate Statutory Instruments.

Contractor Duties

Some of the work undertaken by the Company may be contracted to other firms with which the Company have established and satisfactory relationships. Contractors to the Company have specific duties as defined in this Health and Safety Policy.



I confirm the commitment of Merseyside Metal Services Ltd to a management framework which pursues continual and progressive improvement in Health and Safety performance and incorporates, as far as is reasonably practicable, the provisions of the *Health and Safety at Work etc. Act 1974* and all other relevant Health and Safety legislation.

Therefore, Merseyside Metal Services Ltd will ensure, as far as is reasonably practicable, that the following requirements are established:

- Safe plant and safe systems of work.
- Safe methods for the use, handling, storage and transport of articles and substances.
- Adequate information, instruction, training and supervision to ensure competence.
- A safe and well-maintained workplace, including safe access to and egress from it.
- A safe and healthy working environment with adequate welfare facilities.

The Company considers its Health and Safety objectives to be equally as important as its other business objectives and as a result we are committed to the principle that the effective management of Health and Safety makes a significant contribution to our overall business performance by reducing injuries, ill health and other losses.

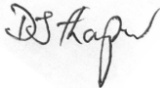
The Company appreciates that the management of Health and Safety cannot be effective unless it actively involves and gains co-operation and commitment from all Employees. Communication and consultation with Employees on Health and Safety issues is seen as a vital part of this process, therefore provision has been made for the active consultation with Employees on all health, safety and welfare issues.

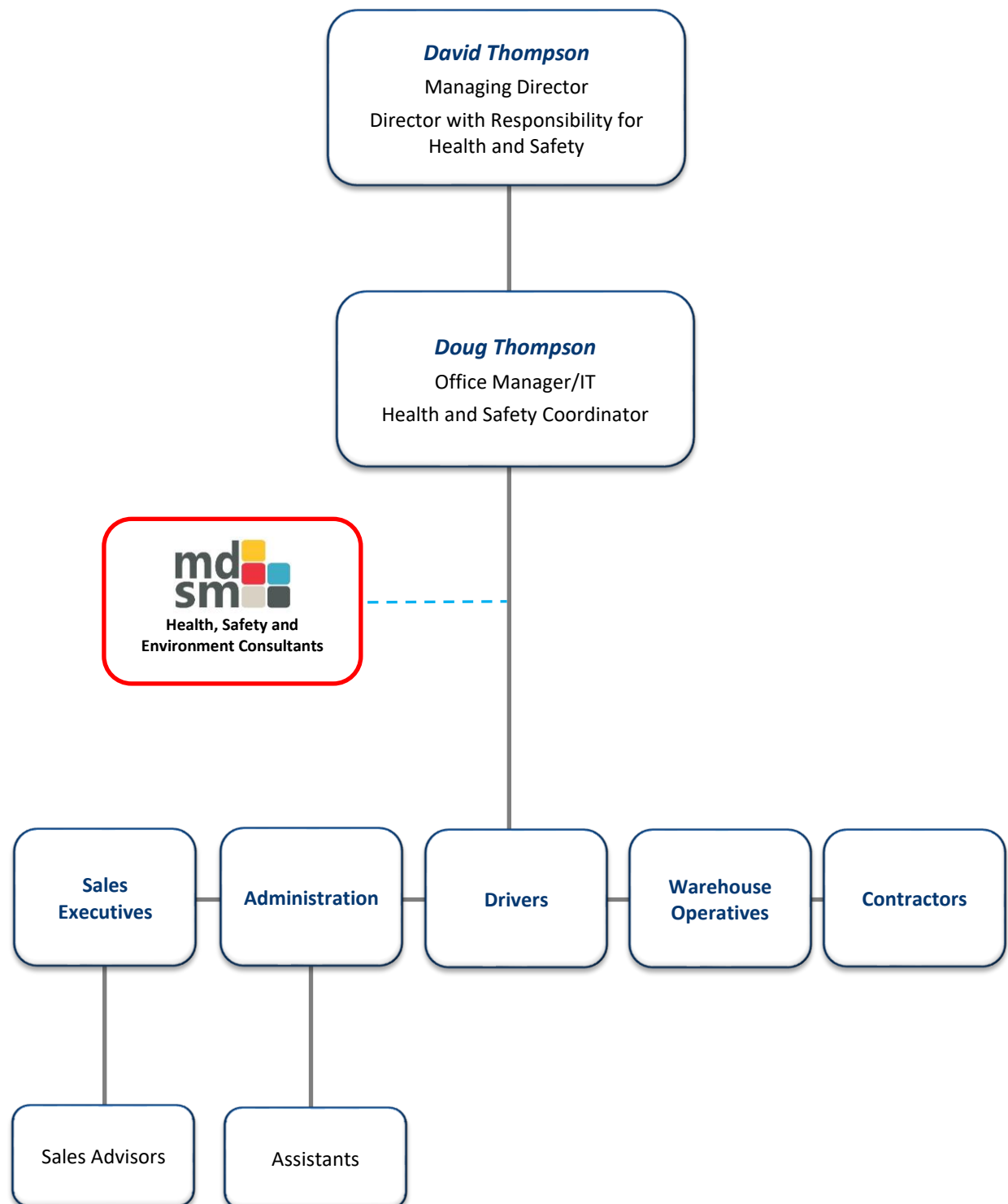
The management of Health and Safety is seen by Merseyside Metal Services Ltd as an essential part of the role of the Company's management team, as it deals with the Company's most important and valuable asset - its Employees. The Company understands that the management of Health and Safety is a partnership between the Company and its Employees with both having specific duties to ensure its success.

There are responsibilities on the management team to ensure the Health, Safety and Welfare of all Employees who are in their charge. This responsibility includes a general 'duty of care' to all other persons who may be affected during the Company's undertakings.

The Company will as far as is reasonably practicable, ensure that adequate resources (e.g. people, time, money and facilities) are made available to enable all Employees to meet the requirements of the Policy and to make a meaningful contribution to its success.

Merseyside Metal Services Ltd will ensure the continuous monitoring and the regular review of the Company's Health and Safety Policy to ensure its objectives are met. To this aim the Company will ensure that the Policy is revised at least annually.

Name:	David Thompson
Position:	Director with Responsibility for Health and Safety
Signed:	
Date:	23rd July 2022



The Director with Responsibility for Health and Safety will, so far as is reasonably practicable:

1. be ultimately responsible for all safety arrangements and ensuring that they are effectively implemented.
2. ensure that sufficient resources are made available for duty holders to suitably undertake their Health and Safety duties to comply with both legal and Client requirements.
3. ensure that arrangements for the Policy are reviewed as often as appropriate, and as a minimum at least once a year.
4. ensure that monitoring of the Policy is undertaken as necessary.
5. ensure that when amendments are made to the Policy these amendments are circulated to, and signed off by, all Employees.
6. ensure that Health and Safety is an agenda that will be suitably discussed at regular meetings of the Directors (e.g. Annual General Meeting).
7. ensure that Health and Safety Consultants employed by the Company are given sufficient advice regarding the Company operations and ensure that suitably knowledgeable Staff are allocated to assist in them supplying Health and Safety Services, as required.
8. establish a system of Employee Induction into Merseyside Metal Services Ltd. This will be a process whereby all new Employees will be required to attend an Induction where all relevant Company information and Management Systems will be explained.
9. ensure that Employee Contracts of Employment contain information regarding failure to abide by Health and Safety Rules and Regulations, give examples of poor practice and Gross Misconduct and outline the system for discipline where rules are contravened.
10. ensure the arrangement and implementation of a system of discipline for cases where a breach of this Policy occurs or where duties are not undertaken.
11. ensure the arrangement of an adequate system of accident reporting and investigation in accordance with the requirements of the *Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013* (RIDDOR).

In addition to these requirements, the Director with Responsibility for Health and Safety will ensure the arrangement of an adequate system of incident reporting and investigation.

12. ensure that Employees remain aware that the requirements apply to operations on the Company premises and also to operations that may occur at Clients' premises including the observance of Clients' Health and Safety provisions.
13. ensure that, in furtherance of its common law and statutory duties such as the *Employers' Liability (Compulsory Insurance) Act 1969* Company Insurances are kept up to date and prominently displayed so as to be available for inspection at all reasonable times by both Employees and a Health and Safety Inspector.

The Director with Responsibility for Health and Safety will also ensure that, in accordance with the *Employers Liability (Compulsory Insurance) Regulations 1998*, that the level of cover shall in aggregate not be less than £5 million.

14. ensure that, when the Company employs Contractors, so far as is reasonably practicable, these Contractors are made aware of, and are subject to, the Health and Safety Policy of the Company.

Contractors should be pre-qualified by assessing their submitted Health and Safety Policies, Risk Assessments and other Safety Arrangements (such as Method Statements) as part of the assessment process.

15. ensure monthly Team Meetings are held with to Employees (and Contractors where relevant) on topics that are relevant to the work being undertaken. This Meeting will provide a forum for sharing information and experiences regarding safe working practices.
16. ensure that Visitors to the Merseyside Metal Services Ltd premises, so far as is reasonably practicable, are made aware of and are subject to the Health and Safety Policy and other specific requirements of the Company.
17. delegate Health and Safety duties, as required, to the Health and Safety Coordinator or to a specifically identified Employee and ensure that all relevant personnel are made aware of the duty changes.

It is also the responsibility of the Director with Responsibility for Health and Safety to ensure that this information is communicated to all relevant persons to ensure that all relevant persons are aware of the duty changes.

18. ensure that regular inspections of all Personal Protective Equipment (PPE) and apparatus are undertaken to ensure their suitability before use.
19. ensure the arrangement and maintenance of a suitable traffic control system at the Company premises to ensure Employee and Public safety.
20. ensure that adequate instruction is given for the operation and use of any Plant, Machinery or Work Equipment (WE), including any relevant safety apparatus and Personal Protective Equipment (PPE).
21. ensure that all Plant, Machinery or Work Equipment (WE), including any relevant safety apparatus and Personal Protective Equipment (PPE) provided is regularly inspected and maintained to ensure that it remains suitable for the purposes for which it was intended.
22. ensure that any necessary information, instruction and training for the requirements of Safe Systems of Work (SSoW) are provided.

For example, this includes, where appropriate, any processes concerned with special hazards related to Safe Systems of Work (SSoW), the operation of machinery, hand tools or other methods of working.

23. be responsible for setting a good personal example and to ensure that when others fail to consider their own well-being and that of others around them that they are counselled and/or disciplined as necessary.
24. ensure that suitable and sufficient Risk Assessments are undertaken in compliance with the *Management of Health and Safety at Work Regulations 1999*.

The Director with Responsibility for Health and Safety of the Company are also ultimately responsible for ensuring that the results of these are communicated to all Employees.

25. ensure that a sufficient volume of information is given to Employees on general safety topics.
26. ensure that "suitable" persons who have received appropriate training and acquired the relevant qualifications are qualified to administer First-Aid.

The Director with Responsibility for Health and Safety will also arrange for the provision of 'Appointed Persons' where required to take charge in an emergency situation (for example summon assistance) if a serious injury or emergency situation develops.

27. ensure the provision of suitable and sufficient arrangements for Fire prevention and control during the Company's undertakings.
28. ensure that all Emergency arrangements, including First-Aid and Fire, are communicated to all Company Employees.

The Director with Responsibility for Health and Safety will also ensure that all Emergency facilities, such as First-Aid Kits and Fire Fighting Equipment (FFE) are regularly inspected and maintained.

29. ensure that new Employees are asked if they have any particular health needs (in terms of disability or recurring illness) and appropriate arrangements are implemented for this health need if required.
30. ensure that Employees do not engage in "horse-play" or dangerous practical jokes.
31. ensure that adequate instruction is given for the operation and use of any Plant, Machinery or Work Equipment (WE), including any relevant safety apparatus and Personal Protective Equipment (PPE).
32. ensure that all Plant, Machinery or Work Equipment (WE), including any relevant safety apparatus and Personal Protective Equipment (PPE) provided is regularly inspected and maintained to ensure that it remains suitable for the purposes for which it was intended.
33. ensure that arrangements are implemented to address the requirements of the *Working Time Regulations 1999*.
34. comply with "No Smoking" policies.
35. observe all Company and Health and Safety Rules.

The Health and Safety Coordinator will, so far as is reasonably practicable:

1. assist in coordinating safety arrangements with the Director with Responsibility for Health and Safety as required.
2. attend regular Management meetings and discuss Health and Safety issues.
3. promote the Health and Safety Management System of the Company as an integral part of the way in which the Company operates.
4. ensure that information is given to Employees on general safety topics and any necessary specific information concerned with day-to-day operations.
5. ensure that any incident, injury or damage involving Employees or Contractors during Company operations is reported immediately to the Director with Responsibility for Health and Safety.

Any near misses involving Employees, Contractors or others must also be reported to the Director with Responsibility for Health and Safety.

6. be responsible for setting a good personal example and to ensure that when others fail to consider their own well-being and that of others around them that the Merseyside Metal Services Ltd rules are reinforced or they are disciplined as necessary.
7. ensure that where an Employee is suspected of being under the influence of drink or other substances that they will be removed from site and the Director with Responsibility for Health and Safety informed who will then take appropriate action.
8. ensure that Employees do not engage in "horse-play" or dangerous practical jokes.
9. ensure that, when the Company employs Contractors, as far as is reasonably practicable, these Contractors are made aware of, and subject to, the requirements of the Company Health and Safety Management System.
10. ensure that Visitors, as far as is reasonably practicable are made aware of, and are subject to, the Health and Safety Policy of the Company.
11. ensure Employees undertake the visual inspection of plant and machinery (Work Equipment (WE)), including all recognised safety devices, before use to ensure it is suitable for the purposes for which it is to be used.
12. ensure competent persons undertake regular documented inspections of plant and machinery (Work Equipment (WE)), including all recognised safety devices, to ensure it is suitable for the purposes for which it is to be used.
13. ensure that adequate instruction is given to Employees for the operation of Work Equipment (WE), including any relevant safety apparatus and protective clothing.
14. ensure that regular inspections are undertaken of all Personal Protective Equipment (PPE) and apparatus are undertaken to ensure their suitability before use.
15. report to the Director with Responsibility for Health and Safety if any safety equipment has been reported as missing, damaged or faulty, as required under the *Personal Protective Equipment at Work Regulations 1992*.
16. be responsible for setting a good personal example and to ensure that when others fail to consider their own well-being and that of others around them that they are counselled and/or disciplined as necessary.

17. when thought appropriate, delegate some Health and Safety duties to a specifically nominated Employee and ensure that all relevant personnel are made aware of the duty changes.
18. comply with "No Smoking" policies.
19. observe all Company Health and Safety Rules.

MD Safety Management Limited are employed by Merseyside Metal Services Ltd as Health, Safety and Environment Consultants on an annually retained basis to advise on:

- Health and Safety Management.
- Environmental Management.

MD Safety Management Limited will as far as is reasonably practicable:

- ✓ Ensure they are competent to perform the services required.
- ✓ Ensure enrolment on a programme of Continuing Professional Development (CPD) or other lifelong learning scheme.
- ✓ Carry appropriate Professional Indemnity (PI) Insurance.
- ✓ Report to the Health and Safety Coordinator.
- ✓ Advise Company Management to an agreed level.
- ✓ Remind the Company in good time when issued documentation should be reviewed and updated.

The Consultant services include but are not limited to:

1. advice regarding current UK Legislation, affecting Health, Safety, Welfare and the Environment.
2. assistance in producing, reviewing or updating Merseyside Metal Services Ltd Health, Safety, Welfare and Environmental Policies and supporting documentation.
3. assistance in advising on the legally required notification to the Enforcing Authority following accident or injury, incident or dangerous occurrence.
4. assistance in undertaking Site Health, Safety, Welfare and Environmental Inspections and Audits, where required in general and for specific contracts.
5. assistance in providing measured and robust Health, Safety and Environment Training services to Management and Employees to ensure competency and continuing personal development.
6. assistance in accident or dangerous occurrence investigation to determine root causes and to prevent recurrence.
7. assistance in providing information on request to the Company regarding best practice for Health, Safety and Environment Management Systems.

Employees of the Company include:

- Sales Executives and Advisors.
- Administration staff and assistants.
- Drivers.
- Warehouse Operatives.

For the purposes of Health and Safety, all Employees have the same duties. The Company expects that each of its Employees observe the requirements given under the *Health and Safety at Work etc. Act 1974*. The Company also understands that no financial charge is to be made on any Employee of the Company to meet any of the requirements of the Health and Safety Policy of the Company, in accordance with the *Health and Safety at Work etc. Act 1974*.

All Employees have a duty, as far as is reasonably practicable, to:

1. avoid injury to themselves, or to others, whilst undertaking their duties while on Company premises.
2. cooperate with the Company Policy in meeting any statutory safety requirements.
3. report immediately to the Health and Safety Coordinator or to the Director with Responsibility for Health and Safety any injury or damage involving Employees, Contractors or others during Company operations.
4. make suggestions whereby the safety of current working arrangements could be improved and to suggest ways of eliminating hazards.
5. not interfere with, or misuse or abuse anything provided to protect their Health, Safety and Welfare that is in compliance with the *Health and Safety at Work etc. Act 1974*.
6. ensure that all materials and work equipment are used correctly and to keep such materials and equipment in good, safe working order.
7. ensure that where you are authorised to do so, that vehicles are pre-inspected before use and driven with due care and attention.

Any vehicle defects or other issues must be reported to the Health and Safety Coordinator or to the Director with Responsibility for Health and Safety.

8. be aware that only suitably trained and, where relevant, certified Employees are allowed to operate Work Equipment (WE).
9. use all relevant safety apparatus and to wear any Personal Protective Equipment (PPE) provided for their use, when required by the task. The Company will ensure that, when required, adequate instructions are given for the use of these items.
10. not engage in "horse-play" or dangerous practical jokes.
11. when using PPE, to report to the Health and Safety Coordinator or to the Director with Responsibility for Health and Safety if any PPE is missing, damaged or faulty as required under the *Personal Protective Equipment at Work Regulations 1992*.
12. comply with "No Smoking" policies.
13. observe all Company Rules.

Contractors are employed by Merseyside Metal Services Ltd in a number of different roles to support business operations. Health and Safety Information is passed to, and received from, these Contractors to ensure that Safe Systems of Work (SSoW) can be assured. Contractors should note that the requirements given below form the basis of general safety rules for Merseyside Metal Services Ltd Contractors when they are working directly for the Company.

All Contractors have a duty, as far as is reasonably practicable, to:

1. ensure that both their Employees and Sub-Contractors comply with the Merseyside Metal Services Ltd Policy on Health and Safety and, where appropriate, ensure their own Company Policy and Arrangements are made available to Merseyside Metal Services Ltd.
2. provide appropriately detailed Risk Assessments and Method Statements (RAMS) when carrying activities on an Merseyside Metal Services Ltd premises.

Risk Assessments and Method Statements (RAMS) must be agreed with the Director with Responsibility for Health and Safety or the Health and Safety Coordinator before work begins. Copies of Risk Assessments and Method Statements (RAMS) must be made available to Merseyside Metal Services Ltd so that compliance with the agreed Method Statement can be maintained.

3. ensure that any Sub-Contractors that are employed also make available for inspection their own Company Health and Safety Policy and Arrangements.

Copies of Risk Assessments and Method Statements (RAMS) must be made available to Merseyside Metal Services Ltd so that compliance with the agreed Method Statement can be maintained.

4. ensure that any equipment used by their Employees or Sub-Contractors is competently inspected to ensure that it is maintained in accordance with the *Provision and Use of Work Equipment Regulations 1998*.
5. ensure that their Employees or Sub-Contractors do not alter anything provided for their use or interfere with any machinery or Work Equipment (WE) on Merseyside Metal Services Ltd premises or that of their Client's, unless authorised by the Health and Safety Coordinator or the Director with Responsibility for Health and Safety.
6. ensure that all machinery or equipment brought onto Merseyside Metal Services Ltd premises, by either their Employees or Sub-Contractors is safe and in good working condition, fitted with any necessary guards and safety devices and with any necessary certificates available for checking.
7. ensure that power tools or electrical equipment of greater voltage than 110 Volts is not brought onto Merseyside Metal Services Ltd premises or that of their Client's, by either their Employees or Sub-Contractors.

Any transformers, generators, extension leads, plugs and sockets must be to latest British Standards for industrial use, and in good condition.

8. ensure that where possible the process of elimination or substitution is demonstrated to reduce the risks presented by activities.
9. report immediately to the Director with Responsibility for Health and Safety or the Health and Safety Coordinator, any injury or damage involving any of their Employees or Sub-Contractors during Company operations. Any near misses involving their Employees or Sub-Contractors must also be reported in the same way.
10. ensure that their Employees and Sub-Contractors obey any safety instructions given by the Company.

11. ensure that any material or substance brought onto Merseyside Metal Services Ltd premises by either their Employees or Sub-Contractors, which has health, fire or explosion risks is used and stored in accordance with relevant Regulations and current recommendations.
12. ensure that relevant safety information is provided to any other person who may be affected by their acts or omissions on Merseyside Metal Services Ltd premises or that of their Clients.

Assessment of risk associated with any substances or processes hazardous to health, which are used on Merseyside Metal Services Ltd premises, must be provided to the Health and Safety Coordinator or the Director with Responsibility for Health and Safety.

13. ensure that their Employees and Sub-Contractors working areas are kept tidy and any debris, waste materials, etc. cleared as work proceeds.
14. ensure that appropriate Personal Protective Equipment (PPE) is worn by both their Employees and Sub-Contractors, when required.
15. ensure that both Employees and Sub-Contractors comply with any mandatory or information signs/posters erected on Merseyside Metal Services Ltd premises.
16. notify the Health and Safety Coordinator or the Director with Responsibility for Health and Safety of their presence when working on Merseyside Metal Services Ltd premises.
17. ensure that all work carried out by both their Employees and Sub-Contractors is in accordance with current relevant statutory provisions, and also to take into account the safety of others on Merseyside Metal Services Ltd premises as well as the General Public.
18. ensure that both their Employees and Sub-Contractors comply with "No Smoking" policies where required.
19. ensure that both their Employees and Sub-Contractors comply with all Merseyside Metal Services Ltd Health and Safety Rules.

3 DO - SAFETY MANAGEMENT

Safety Management Arrangements are those that:



comprise the framework of processes and procedures used to ensure that an organisation can fulfil all tasks required to achieve its objectives through a process of continuous improvement

There is a planned and systematic approach to implementing the Health and Safety Policy through an effective Health and Safety management system.

The aim is to minimise risks. Risk Assessment methods are used to decide on priorities and to set objectives for eliminating hazards and reducing risks.

Wherever possible, risks are eliminated through selection and design of facilities, equipment and processes.

If risks cannot be eliminated, they are minimised by the use of physical controls or, as a last resort, through systems of work and Personal Protective Equipment (PPE).

Performance standards are established and used for measuring achievement. Specific actions to promote a positive Health and Safety culture are identified.

Detailed in this section are the general arrangements that have been put in place to control Health and Safety in the Company, based on the risks identified in the Risk Assessment and any other requirements from current Legislation.

The arrangements are communicated to all Employees (*Management of Health and Safety at Work Regulations 1999*) and any necessary additional information or training that has been identified is also provided.



3.1 ACCESS AND WORKING AT HEIGHT



Company appreciates that some Employees may undertake work at height and as such could be exposed to significant risk. Work at height is defined as:



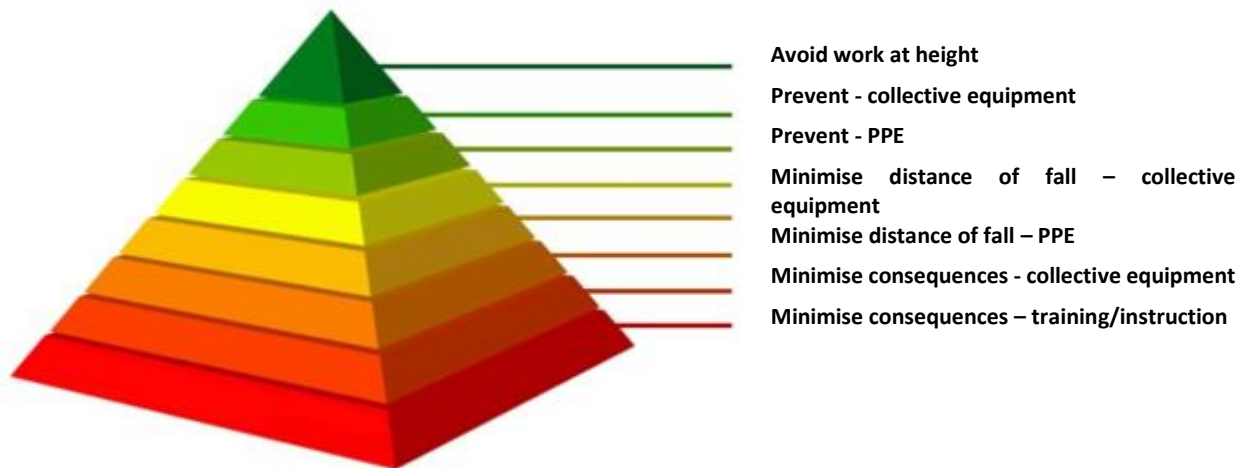
- *Work in any place, including a place at or below ground level;*
- *Obtaining access to or egress from such place while at work, except by a staircase in a permanent workplace, where, if measures required by these Regulations were not taken, a person could fall a distance liable to cause personal injury.*

In accordance with the *Work at Height Regulations 2005*, and as far as is reasonably practicable, the Company will ensure that:

- Work is not carried out at height where it can be undertaken otherwise.
- A suitable and sufficient assessment is made of the risks posed by those operations undertaken at height. The Company will take into consideration the following, during the process of risk assessment:
 - Time and duration of the work.
 - Height at which the work is to be carried out.
 - Hazards associated with falling objects and fragile materials.
 - Local restrictions present (e.g. overhead power lines, adjacent buildings, etc.).
 - Choice of access equipment (e.g. access towers, Mobile Elevating Work Platforms (MEWPs)).
 - Ground conditions, weather and other environmental considerations.

- Training and experience.
- Requirements for additional safety equipment.
- Other work being undertaken in the vicinity.
- Contracting out the work.
- A Safe System of Work (SSoW) is established for any work that requires access to be undertaken at height.

The process of work at height will follow the hierarchy given below:



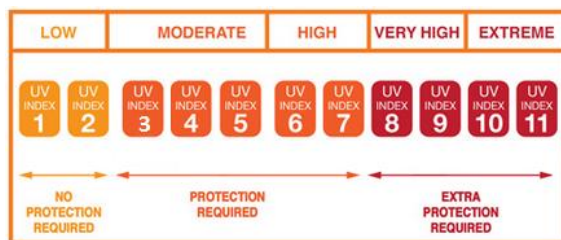
Information regarding Access and Working at Height is given in *Appendix 2 - Arrangements - Specific Duties (Work at Height)*.

3.2 ADVERSE WEATHER



As part of normal operations Employees can work in external areas. This can result in exposure to a number of hazards associated with the weather and quality of lighting due to changes related the time of day. Hazards can include:

- **Sunlight (Skin)** Exposure to this can be apparent when working in external areas without any appropriate skin covering or protection. The Ultraviolet (UV) radiation effects on the skin range from redness, burning and accelerated ageing through to various types of skin cancer (such as Melanoma). The Company uses the following scale to understand the requirements for protection against UV:



The Company avoids working in direct sunlight without suitable protection such as skin protection creams or skin coverings.

- **Sunlight (Eyes)** Exposure to this can be apparent when working in external areas without any appropriate eye protection. Exposure can damage the cornea and produce pain and symptoms similar to that of sand in the eye. The Company avoids working in direct sunlight without suitable eye protection.

- **High winds** Exposure to high winds can result in a number of hazards including working at height, undertaking lifting operations, carrying and moving large items, driving high-sided vehicles, etc. The Company consults weather forecasts and schedules work to avoid work in high winds.
- **Cold weather** Working when external temperatures are low can cause workers to become distracted from their tasks and can also increase the risks associated with Manual Handling. The Company ensures that suitable cold weather clothing (such as Jackets and Gloves) is provided for Employees and informs Employees of the requirements to undertake warm-up exercises prior to any Manual Handling operations that involve a significant risk of incurring a Musculoskeletal Disorder (MSD).
- **Hot weather** Working in external areas in high temperatures can increase the risks associated with exhaustion dehydration. The Company encourages Employees to take regular breaks and to drink plenty of fluids to ensure that hydration levels remain suitable.
- **Snow, hail and ice** Where areas become icy during the Winter months numerous hazards are presented to Employees and others be they on foot or in control of vehicles or other powered-equipment. In such conditions the Company ensures that suitable precautions are taken to clear regular pedestrian routes to ensure safe passage.
- **Other** Adverse weather can also include heavy rain, mist and fog that can cause reduced visibility and accentuate other hazards.

3.3 COMPANY INSURANCES



The Company will ensure that all necessary Insurances are provided. In particular the Company will provide cover under the requirements of the *Employers' Liability (Compulsory Insurance) Act 1969* and the *Employers' Liability (Compulsory Insurance) Regulations 1998* to a value of not less than £5 Million.

Insurances provided can include, but may not be limited to:

- Employer's Liability.
- Public Liability.
- Buildings and Contents.
- Professional Indemnity.
- Business Interruption.
- Contractors All Risks.
- Vehicles.
- Work Equipment (WE).
- Other equipment and materials.

3.4 COMPETENCY AND TRAINING



The Company recognises the importance of Employee training, technical knowledge, etc. and consider this to be a necessary requirement in the process of risk reduction.

The Director with Responsibility for Health and Safety is ultimately responsible for identifying and implementing the necessary training requirements of appropriate Health and Safety Legislation as well as for on the job proficiency in the workplace.

All Employees will as far as is reasonably practicable, be provided with suitable information, instruction and training in relation to their job requirements.

This can include:

- Health and Safety Training.
- Work Equipment Training.
- Systems of Work Training.
- Refresher Training.
- Other specific Training.

Special emphasis is given to work that the Company infrequently undertakes so as to ensure that any danger to Health and Safety is minimised.

Certification and documentation is obtained and recorded as appropriate for the training supplied and in accordance with the *Management of Health and Safety at Work Regulations 1999*.



Records of both official and "on-the-job" training will be kept by the Company and made available for inspection where and when necessary

3.4.1 Induction Training

Every new Employee will receive induction training as soon as possible after commencing work with the Company. The training will include a tour of the premises and processes so that Health and Safety considerations can be explained and hazards and controls identified. An induction-training package is maintained to ensure that all essential information is covered.

The induction is recognised as an opportunity to convey the management beliefs and company values for Health and Safety Management and to help positively influence the attitudes of all new Employees. A signed record of induction is kept as an acknowledgement that they have understood the content and this is kept in Employee files.

3.4.2 Modular Training – Tool Box Talks

Tool Box Talks (TBT) is undertaken on an ad-hoc basis depending on the type of work to be undertaken. They cover a range of topics. A record of attendance is kept.

3.4.3 Supervision

Supervision (on-the-job training) is undertaken so that any Employees who are unfamiliar with a task or a particular item of equipment are mentored and shown established and safe systems of work (SSoW). This may or may not be subject to a specific Risk Assessment depending on the nature of the work. All Employees who are unsure of how a process works or how equipment is operated are encouraged not to participate until further instruction is obtained. Supervision is based on the needs of each individual and will last for as long as is required to ensure that the individual has become competent in that particular task.

3.4.4 Training Records

Training Records are maintained in the Employees personal files with copies of certification where relevant. The Company Training Matrix is updated on a regular basis and used to identify future training requirements.

3.5 CONSULTATION, CO-OPERATION, COMMUNICATION



The Company are aware of the requirements of the *Health and Safety at Work etc. Act 1974* and the *Management of Health and Safety at Work Regulations 1999*, to establish appropriate communication channels with Employees so as to enable the promotion and development of Health and Safety in the workplace and monitor its effectiveness.

3.5.1 Consultation

The *Health and Safety (Consultation with Employees) Regulations 1996* require Employers in the situation where there are Employees, who are not already represented by Safety Representatives under the *Safety Representatives and Safety Committees Regulations 1977*, to consult with those Employees on matters of Health and Safety.

The Company will as far as is reasonably practicable, and in accordance with the *Health and Safety (Consultation with Employees) Regulations 1996*, ensure that:

- Direct consultation channels are available to Employees.
- A process is established by which Employees are able to elect suitable candidates to represent them with respect to Health and Safety and other issues.

Representatives (representatives of Employee safety) will then report any Health and Safety issues to the Company so that discussions can occur to ensure effective resolution. The Company will as far as is reasonably practicable, provide representatives with suitable resources to facilitate effective Employee consultation.

Information regarding Employee Consultation is given in *Appendix 1 - Organisation - Specific Duties (Employee Consultation)* and in *Appendix 2 - Arrangements - Specific Duties (Employee Consultation)*.

3.5.2 Co-operation

It is good practice to actively seek the full co-operation of all those involved in warehousing operations. Therefore, The Company will as far as is reasonably practicable, seek the full co-operation of:

- Company Management.
- Company Employees.
- Client Representatives.
- Contractors.
- Others.

Information regarding Employee Consultation is given in *Appendix 1 - Organisation - Specific Duties (Liaison with Senior Management)*.

3.5.3 Communication

The *Health and Safety Information for Employees Regulations 1989* require Employers to provide Health, Safety and Welfare information in the form of an approved Poster or an approved Leaflet. Therefore, the Company will ensure:

- An approved Poster is provided in appropriate workplaces; or
- A leaflet is provided to relevant Employees.

The Company will also, as far as is reasonably practicable, ensure the effective communication with Employees regarding:

- Any changes to the Health and Safety Policy.
- Requirements for specific site working.
- Requirements for Health and Safety Training.
- New work methods or requirements for use of new Work Equipment (WE).

The Company will communicate such information by way of:

- Management Meetings.
- Tool Box Talks.
- Memos to Employees.

3.5.4 *Special Arrangements*

Although not a common occurrence, the Company may employ people from Europe or other parts of the world. These people may speak a different language or have little or no understanding of English. There may be barriers to effective communication and this may be apparent in the verbal or written form. This can cause potential Health and Safety issues if not considered and addressed. As part of the employment process the Company, as far as is reasonably practicable, would consider the need for:

- Translators (to ensure effective verbal communication).
- Translations (of Health and Safety documents, instructions, signs, etc.).

The Company will also ensure that, where appropriate, special arrangements are made for Employees who may have identified learning difficulties such as those associated with reading or writing.

The Company understands that people with a learning disability can have trouble performing specific types of skills or completing tasks if left to figure things out by themselves or if taught in conventional ways. Depending on the type and severity of the disability, the Company may be able to intervene to help the individual learn strategies to help them cope with the challenges of the workplace.

3.6 *CONTRACTOR SELECTION*



The Company employ the services of various Contractors as part of normal operations. Where this occurs as far as is reasonably practicable, only those Contractors considered competent with regards to Health and Safety will be selected.

The Company has implemented a formal Contractor Control Policy with accompanying Competency Questionnaire. The Policy demands that all Contractors are selected by a process including the assessment of the Contractor Company submitted items, including, but not limited to:

- Health and Safety Policy.
- Risk Assessments and Method Statements (RAMS).
- Training and Experience.
- Insurances (Employer's Liability, Public Liability, etc.).
- Prosecutions/Accident Records.
- Accreditation to recognised pre-qualification schemes (e.g. CHAS, SafeContractor).

This process helps to ensure that all Contractors working for the Company are competent and have made adequate provision for Health and Safety within their own discipline.

Additional items may be required to demonstrate competency for specific projects such as Risk Assessments and Method Statements (RAMS) for example.

3.7 *DISCLOSURE OF INFORMATION*



The Company will as far as is reasonably practicable, meet all the requirements in respect of exempted questions under the *Rehabilitation of Offenders Act 1974* and would remind all applicants for employment that before their appointment is confirmed they may be the subject of a criminal record check.

For the checking process the Company will use the services of the Disclosure and Barring Service (DBS) or other such Agency and information will typically be sought on items such as cautions, reprimands and final warnings as well as convictions. When using Disclosure Information, the Company will follow guidance issued or supported by the DBS and will not use the information contained therein to unfairly discriminate against the subject of the Disclosure Information.

In practice, this means that there are aspects of Company operations which must be followed to comply with the requirements linked to the use of Disclosure Information which the Company use to help decide the suitability of a potential new member of staff. In keeping with the *General Data Protection Regulations (GDPR)*., the Company will ensure the proper secure handling and safekeeping of Disclosure Information.

3.8 DISPLAY SCREEN EQUIPMENT (DSE)



The Company are aware of the requirement under the *Health and Safety (Display Screen Equipment) Regulations 1992*, to undertake a suitable and sufficient assessment of workstations to enable the reduction of risk to as low a level as is reasonably practicable. The Company will as far as is reasonably practicable, and in accordance with the Regulations:

- Undertake Risk Assessments of computer workstations used at workplaces.
- Identify those Employees classed as 'Users' and the control measures required to reduce the levels of risks presented to those 'Users'.
- Arrange and pay for eye and eyesight tests (carried out by a competent person such as an Optometrist or Medical Practitioner) if requested by 'Users'. Further eye and eyesight tests will be arranged at regular intervals if requested by 'Users'.
- Arrange payment for specialist corrective eyewear if required by 'Users'.
- Ensure that Employees are provided with any information, instruction and/or training requirements identified during Risk Assessments, etc.

3.9 ELECTRICAL EQUIPMENT



3.9.1 Electrical Systems

The Company are aware of the significant risks posed by the inappropriate installation, maintenance and inspection of electrical systems. The Company will ensure, as far as is reasonably practicable, that electrical systems at the Company's premises conform to the requirements of:

- *BS 7671:2018 Requirements for Electrical Installations: IET Wiring Regulations 18th Edition*;
- *The Electricity at Work Regulations 1989*; and
- *The Building Regulations 2000* (Approved Document P).

The Company appreciate that the provision of suitably maintained and inspected electrical systems, includes:

- Ring Circuits.
- Fused plugs and switched sockets.
- Wiring colours.
- Isolation and switching.
- Inspection and testing (i.e. formal and periodic inspections).
- Protection against fire.
- Protection against electric shock (e.g. earthing, use of Residual Current Devices (RCDs), insulation material, etc.).
- Protection against over-current (e.g. Fuses, Circuit Breakers (CB's), etc.).

The requirements for regular formal inspection of electrical systems varies depending on its status. *BS 7671:2018 Requirements for Electrical Installations: IET Wiring Regulations 18th Edition* provides guidance in this area as follows:

<i>Electrical System</i>	<i>Interval period (years)</i>
Commercial Installation	5
Industrial Installation	3
External Installation	3
Fire Alarms	1
Short Term Installation	3
Site Installation	3

3.9.2 Portable and Transportable Electrical Equipment

The Company are aware of the significant risks posed due to the inappropriate maintenance and inspection of portable and/or transportable electrical equipment. The Company will ensure, as far as is reasonably practicable, that any electrical equipment available for use during the Company's undertakings, conforms to the requirements of:

- *BS 7671:2018 Requirements for Electrical Installations: IET Wiring Regulations 18th Edition.*
- *The Electricity at Work Regulations 1989.*

The Company appreciate that the term 'portable or transportable' refers to any equipment that is not part of a fixed installation (electrical system) but is intended to be connected to a fixed installation or generator by means of a flexible cable and plug and socket or similar means. The Company will as far as is reasonably practicable, ensure that:

- Any item of portable and/or transportable electrical equipment available for use during the Company's undertakings is **inspected and tested** for electrical safety (Portable Appliance Testing (PAT)) at appropriate intervals by a competent person.
- Records of such **inspection and testing** are requested, filed and made available for inspection on request.

In addition to formal **inspection and testing** procedures, as far as is reasonably practicable, the Company will ensure that regular **formal visual inspections** are carried out as well as **pre-use checks** by equipment operators, as follows:

- **Pre-use checks (visual)** - These should be carried out by the operator prior to the use of the equipment to check for signs of damage, wear and tear, etc. For example, damage to the cable sheath or plug.
- **Formal visual inspections** - These should be carried out routinely by a competent person to identify potentially dangerous faults. Such inspections should include visual checks similar to the ones carried out during **pre-use checks**, but should also include:
 - Removing the plug cover to ensure that a fuse is present and has not been replaced by a piece of wire, nail, etc.
 - Checking that the cable grip is effective.
 - Checking that the cable terminations are secure and correct.

The Company will ensure that only those persons deemed to be competent undertake formal visual inspections and appreciates that such inspections should not include the dismantling of the equipment itself - this should be confined to the combined inspection and testing process (Portable Appliance Testing (PAT)).

The period between formal visual inspections will be dependent on the type of equipment, the conditions of use and the environment in which it is used. The Company will also, as far as is reasonably practicable, ensure that all portable and/or transportable electrical

equipment is provided with a secure and safe means of isolation from all sources of electrical energy, as follows:

- **Isolation of electrical equipment** - This should be carried out to prevent the unintentional reconnection of electrical equipment to a fixed installation (electrical system).

The Company will ensure this by means of Circuit Breakers (CBs) or Residual Current Devices (RCDs) located at the fixed installation.

3.10 EMERGENCY ARRANGEMENTS



Suitable and sufficient arrangements for dealing with serious and imminent danger at the Company's Birkenhead premises will follow the requirements of the *Management of Health and Safety at Work Regulations 1999*.

The Company will as far as is reasonably practicable, and in accordance with the Regulations, ensure that in the event of an emergency, a suitable and sufficient response is executed. The Company considers the foreseeable emergencies to include, but not be limited to:

- Major Accidents.
- Incidents involving multiple casualties.
- Building and structure collapse.
- Fire and explosion.
- High winds and other abnormal weather conditions.

In establishing suitable emergency response procedures, the Company will take into consideration:

- The type of work being undertaken at the premises.
- The characteristics and size of the premises and the number and location of places of work at the premises.
- The type of Work Equipment (WE) in use.
- The number of persons likely to be present at the premises at any one time.
- The physical and chemical properties of any substances or materials on or likely to be at the premises.

3.11 ENVIRONMENTAL MANAGEMENT



The Company appreciates that it has a duty to minimise any adverse impacts to the environment during its undertakings, in line with the *Environmental Protection Act 1990* and associated UK Environmental Legislation. Therefore, the Company will as far as is reasonably practicable, ensure every effort is made to prevent pollutants entering any recognised environmental media, including:

- Air.
- Land.
- Water.

The Company has implemented a formal Environment Policy with assistance from our Health, Safety and Environment Advisors – MD Safety Management Limited.

3.12 EQUALITY AND DIVERSITY



The Company is committed to ensuring equal opportunities in the workplace. This means that all Employees are selected and treated on the basis of individual merit and will not be discriminated against in any way on the grounds of:

- Sex.
- Sexual orientation.
- Gender reassignment.
- Marital or parental status.
- Physical health needs.
- Mental health needs.
- Colour.
- Race.
- Ethnic origin or nationality.
- Age.
- Any other reason than ability and attitude to their work.

The Company will as far as is reasonably practicable, ensure that the Company's arrangements for equal opportunities comply with the necessary Legislation, including the *Equality Act 2010*. The Company appreciates that impairments can be manifest in numerous ways. For example, the impairment may be physical, requiring access to the premises by wheelchair, or be where a person has a sight or hearing impairment. Therefore, the Company will also take into account the requirements of the:

- *Building Regulations 2000 Approved Document M - Access to and Use of Buildings*; and
- *BS8300: 2001 - Design of Buildings and their Approaches to Meet the Needs of Disabled People*.

By complying with the Company's arrangements for equal opportunities, the Company ensures, as far as is reasonably practicable, that:

- Peoples' differences are accepted and catered for. However, this does not mean that minority groups will be given unfair advantage.
- Individuals who have pursued a complaint of racial, sexual, etc. harassment are not discriminated against. For example, they will not be disciplined, dismissed, transferred (unless requested by the individual) or be subject to any other detriment such as being moved into a lower-status job.
- Recruitment and promotion is conducted solely on the basis of individual merit and ability appropriate to the position and that all recruitment advertising is compatible with the spirit and intent of the Company's arrangements for equal opportunities.

3.13 FIRE ARRANGEMENTS



Fire risk prevention at the Company's Birkenhead premises will follow the requirements of the *Regulatory Reform (Fire Safety) Order (RRO) 2005*. The Company will as far as is reasonably practicable, and in accordance with the Regulations, carry out the process of Fire Risk Assessment to ensure provision for:

- The identification of a 'Responsible Person' (the person who has control of or a degree of control of the premises).
- Prevention of fire, including appropriate flammable storage facilities, regular removal of combustibles, etc.
- Raising the alarm, such as manual bells, klaxons, automatic systems, etc.
- Means of escape, providing those persons on the premises with an appropriate number of clearly signed escape routes which lead to a place of safety, are free from obstruction, are provided with emergency doors which operate in the direction of escape, etc.
- Emergency lighting to illuminate emergency escape routes and exits.
- Emergency assembly point(s) where everyone can gather and be accounted for.

- Fire extinguishers, of the correct type, clearly identifiable, easily accessible, regularly maintained, etc.
- Emergency plans to ensure that everyone on the premises reaches a place of safety as quickly and efficiently as possible.
- Training to safeguard the safety of Employees, Contractors, etc. including the nomination of Fire Wardens, the correct operation of fire extinguishers, fire drill, etc.

3.14 GOOD ORDER AND SECURITY



3.14.1 Housekeeping

The Company is aware that slips and trips resulting in falls on the same level are a major factor in sustaining workplace injuries. For this reason, the Company will as far as is reasonably practicable, ensure that acceptable housekeeping standards are maintained through proper organisation and regular cleaning.

3.14.2 Security

The Company will as far as is reasonably practicable, ensure that adequate steps are taken to segregate hazardous operations from those not directly associated with the work such as the general public, with particular emphasis given to children and young persons.

The Company also appreciate that risks may be presented to unlawful entrants to work areas and will therefore ensure, as far as is reasonably practicable, that on-going works are secured and present minimal risk when left unattended.

The segregation arrangements will depend on the risks presented by the work as well as the duration of the work. However, segregation is likely to consist of appropriate signs positioned at the entrance to properties, barriers placed at the perimeter of the workplace, etc.

The Company is also aware of the risks presented by the use of Work Equipment (WE) and vehicles. Where these items are not in use or left unattended, the Company will ensure, as far as is reasonably practicable, that such items are appropriately isolated and secured to prevent inadvertent access or operation.

3.15 HOME AND FLEXIBLE WORKING



The Company will ensure that effective arrangements are in place for staff who are working at home. These may be on a full time, part time or flexible basis depending on their Company roles.

- To ensure that compliance is ensured for homeworking the Company will:
- Ensure that Contracts of Employment are revisited, where necessary, to reflect any changes in Employee terms and conditions as a result of a move to more permanent home working arrangements.
- Check that Company Employers Liability Insurance explicitly covers home worker workplaces.
- A home workplace risk assessment is undertaken – this can be via a checklist or video “walkthrough” provided by the employee.
- A DSE Assessment is undertaken – this can be completed remotely by the homeworker.
- Channels for communication and consultation are developed to ensure that workers are not left isolated from the Company.

- Provide any information, instruction and training as necessary for the home worker (e.g. use of computer hardware or software systems).
- Consult with employees to ensure that the home workplace is electrically safe.
- Consult with employees to ensure that the home workplace is gas safe, where relevant.
- Ensure that any electrical equipment provided, or used, is electrically safe in respect of Portable Appliance Testing (PAT).

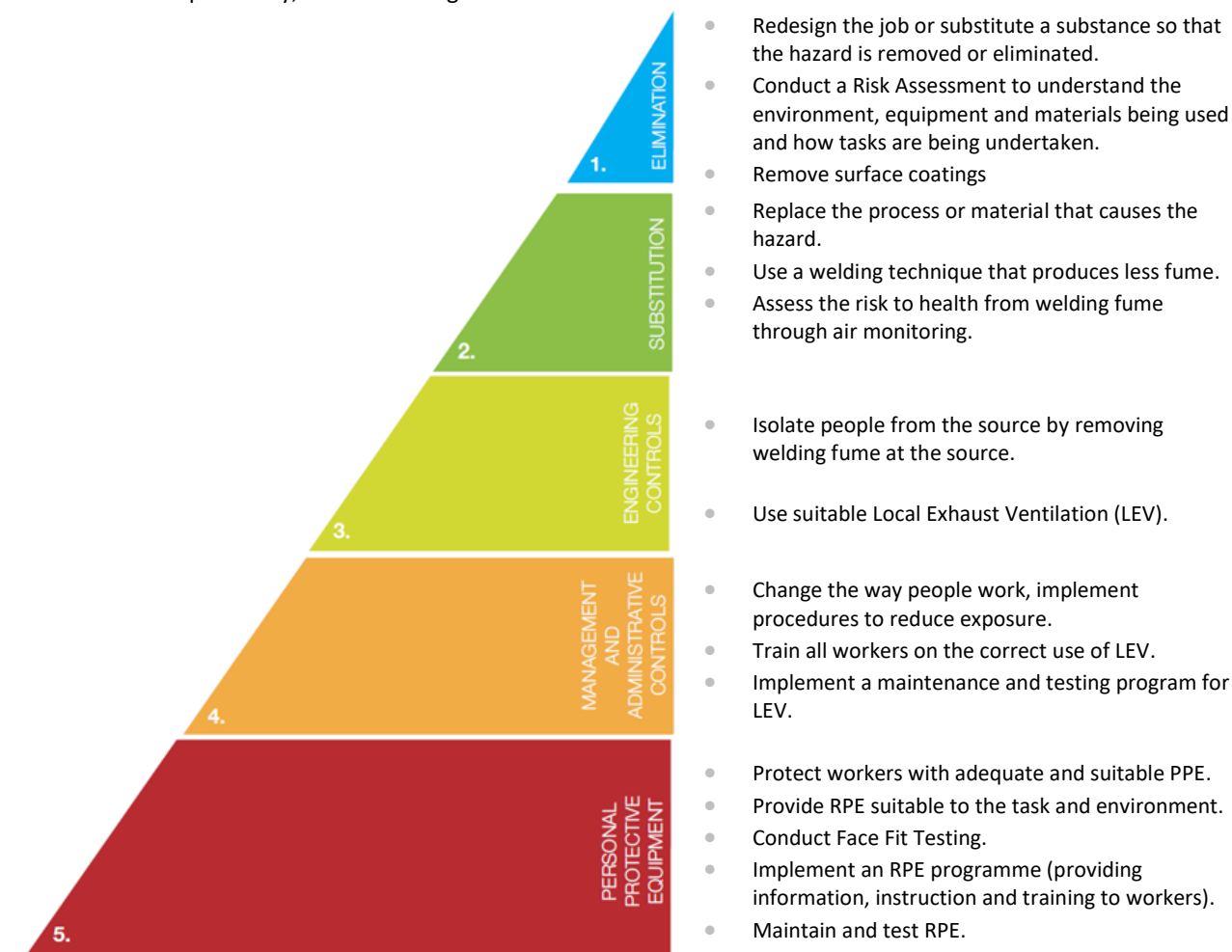
3.16 HOT WORK/WELDING



The Company appreciates that certain tasks carried out by the Company or by Contractors at the Birkenhead premises can generate heat that could ignite combustible and flammable materials. The Company recognise that such work (hot work), if not properly planned, can present considerable fire risks. Therefore, as far as is reasonably practicable, the Company will ensure that:

- Hot work is avoided where possible (with alternate methods being investigated such as use of compression fittings or electronic welding for pipework or use of hot air guns for roofing systems).
- Where required by Clients or where alternative methods are not available, Risk Assessments are undertaken for hot (e.g. welding) operations.
- Suitable risk control measures are developed to reduce the risk of harm to levels that are "as low as is reasonably practicable". This may result in the establishment of a Permit to Work (PTW) with consideration given to the:
 - Measures adopted for housekeeping and combustibles removal.
 - Availability of water for cooling surfaces.
 - Availability of Fire Warden and adoption of "Fire Watch" after hot working.
 - Availability of Fire Fighting Equipment (FFE).
 - Measures adopted for personal protection (e.g. protective gloves, etc.).
 - Measures to protect others not directly involved (e.g. isolation of working areas, etc.).
 - Measures to isolate local area fire detection and stopping systems (e.g. smoke/heat detectors, etc.).
 - Measures taken to prevent heat conduction and containment of hot material (e.g. welding blankets, etc.).
 - Measures taken to isolate building services (e.g. gas and electricity supplies, etc.).
 - Measures taken to ensure other activities in adjacent working areas do not create additional hazards (e.g. use of flammable substances, etc.).
 - Measures taken to ensure area ventilation and respiration protection (e.g. natural dilution ventilation, etc.).
 - Measures taken to ensure that Gas Cylinders are suitable (e.g. are stored correctly away from working area).
 - Measures taken to prevent smoking in working areas.
 - Measures taken to ensure area monitoring after hot work has been undertaken. This may be in conjunction with Client staff.
 - Employees are provided with any information, instruction and/or training requirements identified as necessary.

Specifically, where welding is undertaken:



3.17 LIFTING OPERATIONS AND LIFTING EQUIPMENT (LE)



The Company will as far as is reasonably practicable, ensure that the requirements of the *Lifting Operations and Lifting Equipment Regulations 1998* are addressed to facilitate safe lifting operations.

3.17.1 Lifting Operations

The Company will as far as is reasonably practicable, and in accordance with the *Lifting Operations and Lifting Equipment Regulations 1998*, ensure that:

- Lifting operations are pre-planned, supervised and carried out in a safe manner.
- Lifting operations are planned, supervised and carried out by people who are deemed to be competent (i.e. those who have acquired adequate practical and theoretical knowledge and experience of planning lifting operations).

The Company appreciate that the degree of planning is likely to vary considerably, depending on the findings of the Risk Assessment. Therefore, for complex lifting operations, a formal Lifting Plan will be developed to address any significant risks identified.

A Lifting Plan will as far as is reasonably practicable, include consideration of:

- The competency of the people involved in the lifting operation (e.g. Operators, Health and Safety Coordinator, etc.).
- The suitability of the Lifting Equipment (LE) for the task (e.g. Safe Working Load (SWL)).

- The details of the load (approximate weight, dimensions, etc.) and the height and radius of the lift.
- The areas affected by the lift (e.g. access requirements for other site users).
- Any environmental conditions that may affect the lifting operation (e.g. wind speed, direction, icy conditions, etc.).
- Any obstructions such as telegraph poles, pylons, lighting columns, cables, trees, etc.
- Oversailing Client or other property (including vehicles).

3.17.2 Lifting Equipment (LE)

Lifting Equipment (LE) in use can include, but may not be limited to:

- Electrical Overhead Travelling (EOT) cranes.
- Fork Lift Trucks (FLT).
- Pallet trucks.
- Lifting Accessories (e.g. Ropes, Slings, Shackles, Hooks, etc.).

The definition of Lifting Equipment (LE) is:



any Work Equipment (WE) used for lifting or lowering loads, which includes a person

Lifting Equipment (LE) includes 'accessories' used to attach loads for lifting (e.g. chains, slings, etc.). The Company will as far as is reasonably practicable, and in accordance with the *Lifting Operations and Lifting Equipment Regulations 1998*, ensure that:

- Any Lifting Equipment (LE) used during the Company's undertakings is of sufficient strength and stability for its proposed use and is suitably marked to indicate its Safe Working Load (SWL).
- Prior to any Lifting Equipment (LE) being used for the first time, it is 'thoroughly examined' by a competent person.
- In use Lifting Equipment (LE) is 'thoroughly examined' by a competent person at appropriate intervals (i.e. at least every six (6) months for lifting accessories and equipment used for lifting people and, at least annually for all other equipment).
- The regular maintenance, servicing and inspection of Lifting Equipment (LE) is carried out by a competent person. Any such maintenance, servicing and inspections will be recorded and filed for future reference.
- Employees are provided with any information, instruction and training deemed necessary during the process of Risk Assessment.

3.18 LONE WORKING



The Company appreciates that workplace risks can be exacerbated when Employees and Contractors are required to work alone as part of their job requirements. The risks from lone working are identified in the Company's Risk Assessments together with the current control measures employed.

The main hazards relate to communication and assistance in case of an emergency. Therefore, the Company will as far as is reasonably practicable, ensure that appropriate measures are taken to facilitate communication, such as use of mobile phones, regular checking-in procedures, etc.

Where identified hazards are assessed as having a high level of risk associated to them then the Company may determine that lone working is unacceptable.

3.19 PERSONAL PROTECTIVE EQUIPMENT (PPE)



The Company will as far as is reasonably practicable, ensure that suitable Personal Protective Equipment (PPE) is provided to those Employees (and Labour Only Sub Contractors) who may be exposed to a risk to their Health or Safety while at work, except where the risk has been adequately controlled by other means which are equally or more effective. The Company appreciates that Personal Protective Equipment (PPE) should only be considered to be suitable if it:

- Is appropriate for the risks presented and the conditions at the place where exposure to the risk may occur.
- Is compliant with ergonomic requirements and the state of health of the person or persons who may wear it.
- Is capable of fitting the wearer correctly, if necessary, after adjustments within the range for which it is designed.
- Is effective in the prevention or adequate control of the risk or risks involved without increasing the overall risk.

With regard to the issue of Personal Protective Equipment (PPE), the Company ensures, as far as is reasonably practicable, compliance with the following principles:

PPE Types and Hazards



Eye Protection

Eye protection can prevent eye injuries resulting from chemical or metal splashes, dust, projectiles, gases and vapours. There are a number of options available when it comes to eye protection, including Safety spectacles, goggles, face-shields and visors.



Head Protection

Head protection can prevent head injuries resulting from the impact of falling or flying objects, contact with overhead hazards, contact with rotating machinery, chemical drips or splash, etc. There are several options available when it comes to head protection, including Safety helmets and bump caps.



Ear Protection

Ear protection can prevent damage to hearing resulting from exposure to repeated and/or load impact noise. There are a number of options available when it comes to ear protection, including earplugs, earmuffs, semi-insert/canal caps.



Hand Protection

Hand protection can prevent abrasive, cut and puncture injuries, protect from temperature extremes, exposure to chemicals, and biological agents, as well as vibration and electric shock. There are numerous options available when it comes to hand protection, including Gloves, gloves with a cuff, gauntlets, etc.



Foot Protection

Foot protection can prevent slips, prevent crush, cut and puncture injuries, protect from Wet, hot and cold conditions, prevent exposure to chemicals, and biological agents, as well as electrostatic build-up. There are a number of options available when it comes to foot protection, including Safety boots/shoes with protective toecaps and penetration-resistant mid-soles, wellington boots, etc.



Body Protection

Body protection can offer protection from chemical splashes, spray from pressure leaks or spray guns, flying objects, as well as prevent the entanglement of clothing in rotating machinery. There are a number of options available when it comes to body protection, including conventional or disposable overalls, boiler suits, aprons, chemical suits, etc.



High Visibility Protection

High-visibility (HV) clothing has highly reflective properties and a colour that is easily discernible from any background. High-visibility features are necessary where workers are near moving vehicles or in dark areas. Different types may be specified for different sectors (e.g. Rail, Highways, etc.).



Respiratory Protection

Respiratory protection can offer protection during work undertaken in oxygen-deficient atmospheres, contaminated atmospheres, protect from gases and vapours, as well as dusty environments. There are a number of options available when it comes to respiratory protection, including disposable respirators, reusable respirators, powered and supplied air respirators.

With regard to the issue of PPE, the company ensures compliance with the following principles:

Assessment

The company will assess the suitability of PPE in respect of any risks to health or safety that have not been avoided by other means.

This will include the characteristics that the PPE must have in order to be effective against the risks, taking into account any risks that the equipment itself may create.

Purchasing

The Company will, in order to comply with the new EU PPE Regulations, ensure that PPE is only purchased from trusted sources (members of the British Safety Industry Federation (BSiF) Registered Safety Supplier Scheme). The Company is aware that a Company who has membership of the BSiF can demonstrate:

- A PPE declaration of conformity.
- Their process for sample testing.
- Their quality assurance process.

Compatibility

Where the presence of more than one risk to health or safety makes it necessary to wear, or use simultaneously, more than one item of PPE, such equipment is compatible and continues to be effective against the level of risk presented.

Information, Instruction and Training

Appropriate employees (and Labour Only Sub Contractors) are provided with the level of information, instruction and training deemed necessary to enable the wearer to appreciate:

- The risks that the PPE will avoid or limit against.
- The purpose for which and the manner in which the PPE is to be used.
- The actions required to ensure that the PPE remains in an efficient state, in efficient working order and in good repair.

Use

The company will ensure that any personal protective equipment provided is:

- Properly used.
- Used in accordance with any information, instruction and/or training given.
- Returned to the accommodation provided for it after use.

Maintenance and Replacement

The company will ensure that any PPE provided is properly maintained in an efficient state, in efficient working order and in good repair. This includes the replacement and/or cleaning of such equipment.

Accommodation

The company will ensure that suitable accommodation is made available for the safe storage of appropriate PPE when it is not required.

Reporting loss or defect

The company expect employees (and Labour Only Sub Contractors) to report to an appropriate person (e.g. Managers, Health and Safety Coordinator) any loss of, or obvious defect in, any PPE issued.

Information regarding Personal Protective Equipment (PPE) is given in *Appendix 2 - Arrangements - Specific Duties (Personal Protective Equipment (PPE))*.

3.20 PRESSURE SYSTEMS



The Company may use pressurised Work Equipment (WE), such as compressed air lines during the course of its recycling operations. Therefore, the Company will as far as is reasonably practicable, ensure (as required by the *Pressure Systems Safety Regulations 2000*) that:

- Such equipment is provided with suitable instructions for its use and the action(s) to be taken in the event of an emergency.
- Such equipment is regularly maintained, taking in to account the system and equipment's age, its use and its operating environment.
- A written scheme of examination is drawn-up by a competent person and that the scheme is adhered to.

3.21 RELATIONSHIPS WITH NEIGHBOURS



The Company may occasionally be required to provide information, help and assistance to neighbours of properties during its operations. The Company appreciates that problems may be experienced when occupiers and local residents, especially neighbours, become frustrated by congestion, noise and other disruptions or disturbances. Therefore, the Company will as far as is reasonably practicable, make every attempt to ensure that occupiers, local residents, etc. are informed of any activities that may affect them.

The Company appreciate that compromise is essential if good relationships are to be made and maintained. The Company will as far as is reasonably practicable, ensure that any issues experienced by neighbours, local residents, etc. or anticipated to be an issue for such people, are reported to the Company to enable the Company to act accordingly. For example, reduce the level of risk presented or to investigate any incident that may have occurred.

3.22 RESTRICTED SPACES



The Company may undertake work where movement is restricted by the nature of the building or structure. Whilst not strictly confined spaces (as defined by the *Confined Spaces Regulations 1997*) these spaces can exacerbate other hazards presented by the workplace including, but not limited to, those related to:

- Ergonomics.
- Fire.
- Hazardous Substances.
- Atmospheres.

- Ventilation.
- Heat.
- Lighting.
- Access and egress.
- Emergency rescue.

Therefore, the Company implements measures to ensure that no person at work shall enter or carry out work in a restricted space unless an assessment has been made and a Safe System of Work (SSoW) developed to address the issues associated with:

- The physical characteristics of the space.
- Physical hazards presented by the space.
- The nature and length of the work to be undertaken.
- The competency of those undertaking the proposed work.
- The requirements for providing suitable information, instruction and training to all those Employees undertaking or supervising the work.
- The requirements for suitable and sufficient arrangements for the rescue of persons in the event of an emergency.

3.23 RISK ASSESSMENT



The Company appreciates the significance of the *Management of Health and Safety at Work Regulations 1999* with regard to the assessment of risk.

The Health and Safety Executive (HSE) "**5 Steps to Risk Assessment**" is used as the basis of the approach to Risk Assessment.



3.23.1 Generic

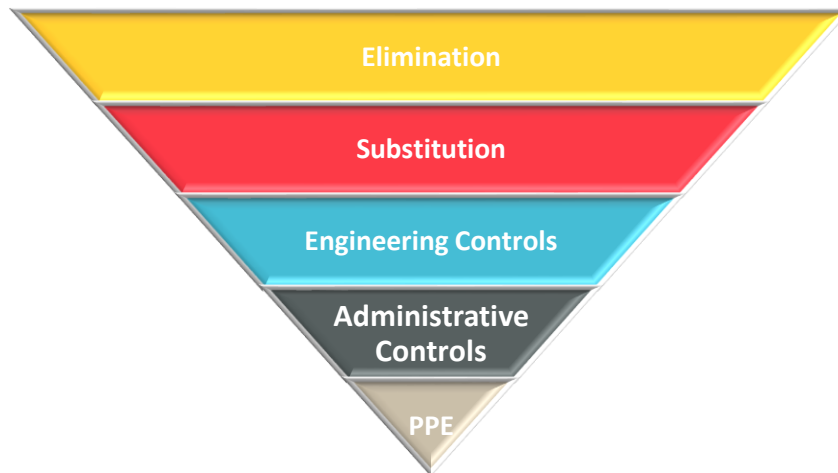
Following a generic approach for all operations the Company will as far as is reasonably practicable, ensure that:

- A suitable and sufficient assessment is undertaken of the risks to Employees and any other persons who may be affected by our undertakings.
- Given that the Company employ five (5) or more persons, the significant findings of the assessments are recorded.
- The results of the assessments are communicated to all Employees and any other relevant persons.
- Arrangements are made for the regular review of such assessments at appropriate intervals.
- Any additional information, instruction and/or training requirements identified during the assessment process is arranged.

3.23.2 Specific

The Company will as far as is reasonably practicable, arrange for a Specific Risk Assessment to be undertaken when the level of detail presented in Generic Risk Assessments is not great enough to cover a particular set of unique circumstances or when persons are likely to be exposed to unacceptable levels of risk.

This may be in conjunction with a specific Method Statement in a Risk Assessments and Method Statements (RAMS) document, for example. The process of Risk Assessment follows the hierarchy in the diagram below:



Information regarding Risk Assessment is given in *Appendix 2 - Arrangements - Specific Duties (Risk Assessment (RA))*.

3.23.3 Review

Risk Assessments will as far as is reasonably practicable, be reviewed at appropriate intervals (annually or as circumstances dictate), including:

- After the introduction of new work practices.
- After the introduction of new plant and machinery.
- After an accident.
- After a Dangerous Occurrence, etc.
- Where other conditions dictate.

3.24 SAFE SYSTEMS OF WORK (SSoW)



The Company appreciates that Safe Systems of Work (SSoW) are a key component in the elimination of risks to the Health and Safety of Employees, Contractors and Clients. A Safe System of Work (SSoW) is a combination of management arrangements including the Risk Assessment and Method Statements (RAMS) as well as training and supervision to ensure that work can progress safely and without risks to health and safety. Therefore, the Company will ensure, as far as is reasonably practicable, that appropriately detailed Safe Systems of Work (SSoW) are developed for its undertakings, especially for those operations presenting high risks.

The Company use the process of Risk Assessment to identify the hazards associated with the task in question and to develop Safe Systems of Work (SSoW) to control the remaining hazards. In the development of Safe Systems of Work (SSoW), as far as is reasonably practicable, due consideration is given to the following:

- **Task Analysis** - What plant and equipment is involved, who will be doing what, where the task will be undertaken, how the task will be undertaken, interaction with other site users and the general public.
- **Identification of the hazards associated with the task** - The use of plant and equipment, materials, substances, etc.
- **Assessment of the risk involved** - The assessment of the risks presented by the task.
- **Identification of existing methods of control and additional controls necessary** - Whether existing control methods are adequate or whether additional controls are required.

- **Definition of the SSOW** - The component parts of the task (e.g. preparation, authorisation, planning and job sequences) and the recognised safe system of work (SSOW) which is made up of the Risk Assessment and Method Statements (RAMS).
- **Implementation of the SSOW** - The supervision of site personnel and instruction and training requirements.
- **Monitoring of the SSOW** - The regular monitoring of the work to ensure the system is operating effectively and that accepted instructions are being followed.

3.25 SAFETY SIGNS



The Company will ensure that all Safety Signs used on site and displayed at the Company premises comply with the requirements of the *Health and Safety (Safety Signs and Signals) Regulations 1996*.

A Safety Sign is a sign that uses a pictorial symbol to provide Health or Safety information or instruction. The sign may also include a written message. The Regulations do not specify where or when a Safety Sign must be used, but if a sign is displayed it must be one of five (5) types:



Prohibitive Signs

These signs are of a round shape, represented by a black pictogram on a white background, a red edge with diagonal line and are used to prevent an action where there is danger.



Warning Signs

These signs are triangular and have a black pictogram on a yellow background with black edging. They warn of a danger and for precautions and / or care to be taken to prevent harm.



Mandatory Signs

Mandatory signs require that specified actions are to be followed. These signs are typically associated with the compulsory wearing of personal protective equipment. They are round in shape and have a white pictogram on a blue background.



Information Signs

These signs are rectangular or square in shape and have a white pictogram on a green background and provide instructions on the safe way of doing something or where a safety item is located. The most common use of these signs is to provide directions as to the nearest fire escape route.



Fire Fighting Equipment Signs

These signs are rectangular or square in shape and have a white pictogram on a red background and are used to identify and locate Fire Fighting Equipment and fire alarm activation points.

3.26 TRAFFIC MANAGEMENT



The Company appreciates that workplaces need to be properly organised to protect both pedestrians and vehicle operators. The Company therefore ensures, as far as is reasonably practicable, that traffic routes are provided which are suitable for the persons and vehicles using them and that such traffic routes are provided in sufficient numbers in appropriate locations. The Company has developed a Vehicle Safety Policy and will, as far as is reasonably practicable, ensure that suitable and sufficient steps are taken to ensure that:

- Traffic routes are designed to allow vehicles to operate on them without causing a risk to the Health or Safety of pedestrians close by.

- Any pedestrian door or gate that opens out on to a vehicle traffic route is appropriately segregated from that traffic route to ensure pedestrians are able to see any approaching vehicles, etc. from a protected area.
- Sufficient separation is provided between pedestrians and vehicles operating in the workplace.
- Pedestrian and vehicle access points are kept separate, are clearly identified and are kept free from obstruction.
- Traffic routes are identified by clearly legible signs.
- Traffic routes are regularly checked, maintained and kept free from obstruction.

3.27 VEHICLES



3.27.1 Use of Vehicles

The Company possesses vehicles for the transportation of Employees, work equipment and products. Where vehicles are used the Company ensure the arrangement of suitable and regular maintenance and repair at the prescribed intervals, as necessary and as recommended by manufacturers.

All vehicles are pre-use checked for any defects (e.g. worn tyres, defective brakes, missing or broken lights, etc.) and reactive maintenance is also arranged. All Employees are trained in the safe use of such transportation and are certificated where appropriate. All Employees, will, when working on the premises of a Client, observe the transport rules imposed for that site.

3.27.2 Use of Mobile Phones

The Company instructs Employees not to use a mobile phone when driving and recommend a call is made when the vehicle is stationary and parked safely with the engine switched off. Company Employees will strictly comply with the *Road Vehicles (Construction and Use) (Amendment) (No. 4) Regulations 2003*, in that it is an offence whilst driving to use a handheld device to:

- Speak or listen to a phone call.
- Use a device interactively to access any sort of data - including Internet, text or other images.
- To hold a hands-free phone or other mobile device at any point whilst driving.
- The use of a hand-held phone, even when stationary (i.e. in a traffic jam, at the traffic lights) will remain an offence.

Where the use of mobile phones is allowable the Company will require Employees to:

- Use a hands-free kit, providing the phone is being held in a "fixed" cradle.
- Only make or receive calls whilst the phone is being held in a cradle.
- Make a call on a hand-held phone for a genuine emergency call to 999, if it would be unsafe for the driver to stop.
- Keep calls short - and not to argue or to enter into intense negotiations.
- Tell callers you are driving and may need to break off your conversation suddenly.
- Save any numbers you may need to a shortcut dial before starting your journey.

The Company does not stipulate that the device has to be switched off when in the vehicle and understands that drivers may continue to receive data on their phone (or other device such as iPad, Smartphone, PDA, tablet, laptop, etc.) when on the move, providing that the driver does not hold the device whilst in operation.

3.27.3 Use of Satellite Navigation Systems/Other Devices

Satellite Navigation Systems or Global Positioning Systems devices (GPS) and other devices (e.g. dashboard cameras) should be used safely. As many of the devices are retrofitted the safe use and positioning of such a Device should also be considered:

- The device should be programmed when the vehicle is stationary in a safe location.
- Carefully follow any instructions for use for the device.
- The device should be positioned within the driver's field of vision whilst not obscuring the view of the road around the vehicle, including the driver's peripheral vision.
- The device should not provide an unnecessary distraction and any settings should not be changed whilst the vehicle is moving.
- Drivers should understand what the device icons mean so that it can be read quickly without taking concentration away from the road.
- The device should be placed away from any airbags to prevent it causing injury if an airbag were to deploy.
- The device should be secured firmly and should be kept out of the way of a vehicle's controls.

3.28 VENTILATION/EXTRACTION SYSTEMS



The Company appreciates that the workplace needs to be properly ventilated. The Company therefore ensures, as far as is reasonably practicable, that areas in which Employees are working in are:

- Provided with a suitable ventilation system capable of providing workplace occupants with a sufficient quantity of fresh air. Air allowed into the building from outside (e.g. by opening a window) can be considered to be "fresh".
- Provided with a regularly maintained ventilation system. If windows are inoperable (e.g. jammed or have been painted shut) then this should be reported to the Company to ensure such issues are rectified at the earliest opportunity.

3.29 VIOLENCE



The Company recognise that people who deal with members of the General Public may be at risk from aggressive or violent behaviour. The Company requires Employees to report any aggressive or violent incident, with immediate effect, to the Director with Responsibility for Health and Safety.

Work Related Violence (WRV) experienced by an Employee is defined as:



Any incident in which an Employee is abused, threatened or assaulted in circumstances arising out of the course of his or her employment

3.30 WORK EQUIPMENT (WE)



The Company will ensure, as far as is reasonably practicable, that all Work Equipment (WE) provided for use during the Company's undertakings, complies with the requirements of the *Provision and Use of Work Equipment Regulations 1998*.

As such the Company will ensure that all available WE remains suitable for the purpose for which it was intended, in compliance with the following principles:

- **Selection** WE whether purchased or hired will as far as is reasonably practicable, be assessed with regard to its suitability for its intended use.
- **Maintenance** WE will as far as is reasonably practicable, be maintained at appropriate intervals (as recommended by the manufacturer). Consideration will also be given to the frequency and conditions of use when formulating maintenance schedules.
- **Inspection** Where the safety of WE depends on its installation conditions, as far as is reasonably practicable, the Company will ensure that it is inspected:
 - After its installation and before being used for the first time.
 - After assembly at a new site or in a new location.

Due consideration will also be given during an inspection to any conditions that could result in the deterioration of the WE.

Any formal inspections carried out will be recorded, filed and made available for inspection (as may be required), until the next formal inspection has been carried out and subsequently recorded.

- **Information and Instruction** Employees will be provided, as far as is reasonably practicable, with appropriate information and instruction on the operation of WE to ensure that it is able to be operated without risk to health or safety.
- **Training** Suitable and sufficient training will as far as is reasonably practicable, be arranged to ensure competency during the operation of WE. The training provided may be:
 - Formal (e.g. Certificated Training delivered by an Approved Organisation).
 - Informal (e.g. delivered in-house by a competent person following safe operating procedures (manufacturers operating instructions)).
 - A mixture of both formal and informal training.
- **Supervision** Suitable levels of supervision will as far as is reasonably practicable, be provided to those who are not proficient in the use of specific items of WE.
- **Guarding** All necessary guarding of dangerous parts will be undertaken. Where guards are installed the Company will as far as is reasonably practicable, ensure their regular inspection to ensure they remain suitable for their intended purpose for example:
 - 1) In place.
 - 2) Free from defect.
 - 3) Not bypassed or otherwise interfered with.
- **Specific Risks** Specific risks associated with the operation of WE will as far as is reasonably practicable, be assessed and suitable control measures identified to reduce the level of risk presented to operators and others who may be affected during their operation.
- **Controls** All WE will as far as is reasonably practicable, be provided with clearly identified start and stop controls as well as emergency stop controls where deemed necessary. Where appropriate, suitable methods by which WE can be isolated from sources of energy will also be provided.

4 DO - OCCUPATIONAL HEALTH MANAGEMENT

Occupational Health is



The promotion and maintenance of the highest degree of physical, mental and social well-being of workers in all occupations by preventing departures from health, controlling risks and the adaptation of work to people, and people to their jobs

4.1 BIOLOGICAL HAZARDS



The Company appreciate that Employees may be exposed to Biological Hazards during Company operations. The Company recognise that exposure to such hazards can present considerable risks to the health of Employees. Therefore, as far as is reasonably practicable, the Company will ensure that:

- Risk Assessments are undertaken for any work that is liable to cause exposure to Biological Hazards. The Company consider foreseeable Biological Hazards to include, but may not be limited to:
 1. Leptospirosis (Weil's Disease).
 2. Tetanus.
 3. HIV/AIDS.
 4. Hepatitis (A, B, C).
 5. Legionella.
 6. Toxocariasis.
- Suitable risk control measures are developed to reduce the risk of harm to levels that are "as low as is reasonably practicable" (ALARP).
- The results of Risk Assessments are communicated to appropriate Employees and any other relevant persons.
- Employees are provided with any information, instruction and/or training requirements identified during the Risk Assessment.
- Employees are provided with suitable Personal Protective Equipment (PPE) where the risk of exposure cannot be controlled at an acceptable level by any other means.

4.2 FIRST-AID PROVISIONS



The Company are aware of the requirement, under the *Health and Safety (First-Aid) Regulations 1981*, to provide adequate and appropriate equipment, facilities and personnel to ensure Employees receive immediate attention if they are injured or taken ill at work. To this end a First Aid Needs Assessment has been undertaken.

4.2.1 First-Aiders

The Company will as far as is reasonably practicable, and in accordance with the *Health and Safety (First-Aid) Regulations 1981*, ensure that:

- Employees, Contractors and Visitors to the premises and/or operational sites are instructed as to the location of the First-Aid post and any Employees who are proficient in First-Aid.
- 'Suitable' persons are identified to administer First-Aid. 'Suitable' persons are those who have received training and acquired the First Aid at Work (FAW) qualification.
- Any First-Aid Training arranged, is undertaken by persons or organisations qualified to do so.

Information regarding First-Aid Provision is given in *Appendix 2 - Arrangements - Specific Duties (First-Aid, Accidents & Work-Related Ill Health)*.

4.2.2 Appointed Persons

In accordance with the *Health and Safety (First-Aid) Regulations 1981*, for low risk tasks such as those carried out at the Company's premises, the Company may provide an 'Appointed Person'. The Company appreciate that 'Appointed Persons' are required to take charge of an emergency situation (e.g. summon assistance from the Emergency Services) if a serious injury or emergency situation develops.

The Company understands, however, that 'Appointed Persons' should not attempt to give First Aid for which they have not been trained. It is recommended by the HSE that Appointed Persons still undertake Emergency First Aid at Work (EFAW) training.

4.2.3 First-Aid Equipment

The Company will as far as is reasonably practicable, and in accordance with the *Health and Safety (First-Aid) Regulations 1981*, ensure that:

- Specific First-Aid requirements are determined (assessed) for the operations undertaken from the premises.
- Suitably stocked First-Aid Kits are provided in appropriate locations at the premises.
- Specific First-Aid requirements are determined (assessed) for work undertaken.
- The contents of First-Aid Kits are checked on a regular basis and re-stocked as appropriate.

4.3 FITNESS FOR WORK



The Company Employees must ensure that they are fit to undertake the work required of them by the Company.

This includes not being under the influence of illegal drugs or alcohol whilst at work. The Company expects as far as is reasonably practicable, all Employees to:

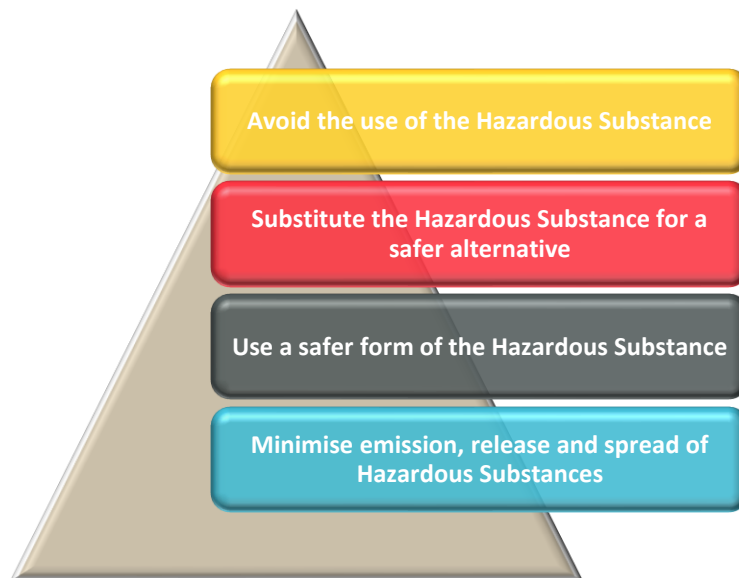
- Inform them of the nature of any medical treatment they are receiving. This may include divulging information relating to the issue of prescription drugs by a General Medical Practitioner.
- Inform the prescribing medical examiner of the nature of work undertaken by themselves, such as operation of Work Equipment (WE), vehicles, work at height, etc.
- Ensure adequate breaks are taken in between those times working for the Company. This will involve tiredness incurred as a result of work undertaken outside of Company hours which can affect both quality and safety performance for the individual and hence the Company.

4.4 HAZARDOUS SUBSTANCES (COSHH)



The Company appreciates that its Employees may be exposed to Hazardous Substances during Company operations.

The Company recognise that these Substances can present risks to the safety and health of Employees. Therefore, in accordance with the *Control of Substances Hazardous to Health Regulations 2002*, and as far as is reasonably practicable, the Company will:



The Company will as far as is reasonably practicable, and in accordance with the *Control of Substances Hazardous to Health Regulations 2002*, ensure that:

- COSHH Assessments are undertaken for any work that is liable to expose its Employees to any substance considered hazardous to health.
- All relevant routes of exposure (e.g. inhalation, skin absorption, injection and ingestion) are taken into account during any COSHH Assessment.
- All relevant routes of exposure (e.g. inhalation, skin absorption, injection and ingestion) are taken into account during the development of suitable risk control measures. As such, procedures will be established to ensure such measures are designed to reduce the risk of harm to levels that are "as low as is reasonably practicable". For example:
 - A purchasing strategy to control the volume and type of Substances purchased.
 - Exposure rates maintained below the recognised Workplace Exposure Limit (WEL), where one exists.
 - Exposure prevention to those Substances that cause cancer, asthma or genetic damage.
 - Effective storage and handling procedures to minimise the potential for accidental release or inadvertent contact.
 - Effective emergency procedures, including those for Fire, First-Aid, Accidental Release, etc.
- The use of Hazardous Substances is monitored to ensure that exposure is being suitably controlled, in line with the requirements of COSHH Assessments and associated procedures.
- The results of COSHH Assessments are communicated to appropriate Employees and any other relevant persons.
- Employees are provided with any information, instruction and/or training requirements identified during the COSHH Assessment.
- Employees are provided with suitable Personal Protective Equipment (PPE) where the risk of exposure cannot be controlled at an acceptable level by any other means.

4.5.1 Health Assessment

The Company will ensure that Employees' health is assessed prior to employment, where possible, to establish whether:

- They are medically fit to perform their proposed duties and are reasonably likely to remain so, taking into account company policy on equality.
- There is any pre-existing condition or impairment that would necessitate a restriction of duty or adjustment in the workplace or might later be confused with the effects of future employment.
- Any periodic Health Assessment or Health Surveillance that will be required in the future.
- They are medically eligible for company benefits (e.g. pension).
- The Employee would be classed as a disabled person under the *Equality Act 2010*.

Health Assessment is any assessment of an individual's health that is intended to determine whether the individual is fit to perform a particular task or whether the individual's health has been (or may be) affected by performing a particular task.

The Company will arrange for a Pre-placement Health Assessment for prospective Employees. Although this is a Company policy, this may also be as a requirement of existing Clients. A Pre-placement Health Assessment will:

- Take place after a successful interview or selection process resulting in a conditional offer of employment.
- Take into account the outcome of Risk Assessment in order to protect Health and Safety.
- Include an assessment of fitness to perform night-work, where relevant.
- Not have the effect of treating disabled persons less favourably in seeking or retaining employment, unless this can be justified.

The Company will ensure that all information is treated in the strictest confidence and where necessary and where permission is granted, will liaise with Medical Practitioners to ensure that a Safe System of Work (SSoW) can be developed to ensure safe and healthy working.

4.5.2 Health Surveillance

The main aim of Health Surveillance is to detect early indications of a disease or condition to allow the Employer to introduce measures to prevent further harm to Employees. As Health Surveillance is likely to further the protection of Employee health, the Company will arrange formal Health Surveillance by an Occupational Health Practitioner for Employees where:

- Specific Legislation requires it (e.g. Regulations relating to COSHH, Noise, Lead, etc.)
- An Employee reports in confidence of a health concern or a diagnosed medical condition that may necessitate further and specific action.
- It is identified within Company Risk Assessments. The process of Risk Assessment may show that:
 - There is an identifiable disease or adverse health condition related to the work.

- Valid techniques are available to detect indications of the disease or condition (e.g. medical tests for Reynaud's syndrome (caused by vibration exposure)).
- There is a reasonable likelihood that the disease or condition may occur in the particular conditions of work.

4.5.3 Health Monitoring

The Company will inform Employees of the requirement to divulge information relating to their general health and well-being where it may impact their own safety or that of others when working on behalf of the Company. This will include understanding any existing physical or mental health needs so that existing conditions can be understood and systems can be established to take these needs into account when developing risk controls.

Health issues that may be apparent can include:

- Diabetes.
- Asthma.
- Psoriasis.
- Dermatitis.
- Cardiac conditions, Pulmonary Embolism (PE), etc.

A visit to a General Medical Practitioner may result in obtaining a "Fit Note". If the Fit Note states that an Employee is "not fit for work" then the Fit Note must be given or sent to the Company as it provides evidence that an Employee cannot work because of a health condition. The Company can then use this information to plan work and also to arrange Employee sick pay.

If the Fit Note states that an Employee "may be fit for work", this means an Employee may be able to return to work with some help from the Company. This would be after confidential discussion with the Company to see if a return to work is possible, taking into account the effects of the illness or injury.

If it is possible for the Employee to return to work it will be agreed as to how this can happen, what support the Employee will receive and how long the support will last. If it is agreed that it is not possible for the Employee to return to work until further recovery is made then the Employee does not need to return to the Medical Practitioner for a new Fit Note.

Specific Clients may require Employees to complete a medical self-assessment or divulge other information relating to their health as part of their conditions for working in safety critical environments.

4.6 INFECTIOUS DISEASES



The Company adopts sensible procedures with respect to infection control including:

- Ensuring that suitable welfare facilities are available to enable the practicing of infection control (e.g. soap, hand sanitising products, etc.).
- Ensuring Employees familiarise themselves with the standards for infection prevention and control at the Company premises.
- Ensuring Employees are aware of the latest guidance established by Public Health England (PHE) or the Government with respect to specific viruses.
- Ensuring Employees implement best practice in infection prevention and control in the workplace.
- Ensuring, where necessary, that specific information regarding infection control is incorporated into Company Risk Assessments, Method Statements and other instructions or procedures.

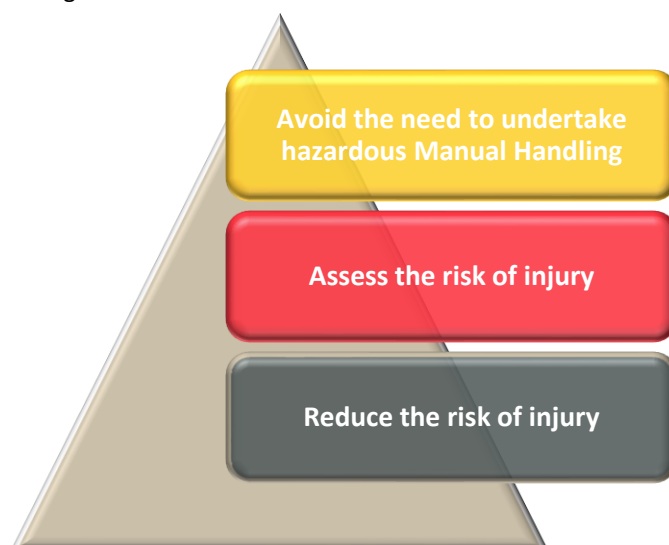
- Ensuring that where infection prevention and control advice changes this is routinely updated and briefed to Employees.
- Providing Employees with information regarding appropriate protection (e.g. immunisation, vaccination, etc.).
- Providing any additional information, instruction and training as required to support awareness and good practice in infection prevention and control.
- Implementing mechanisms to monitor and review infection prevention and control procedures.
- Taking appropriate care of any Employees affected as a result of infection or as a consequence of coming into contact with infections.
- Ensuring that Employees are offered protection from discrimination if they are infected.

4.7 MANUAL HANDLING



The Company appreciates that tasks involving Manual Handling have the potential to cause Musculoskeletal Disorders (MSDs).

In accordance with the *Manual Handling Operations Regulations 1992*, the Company will ensure that appropriate arrangements are adopted to eliminate and/or reduce the hazards associated with Manual Handling, including:



This can involve:

- The use of mechanical lifting aids.
- Team Lifting procedures.
- The delivery of materials as close as possible to their point of use.
- Storage of those materials that are used most commonly, close to the working area.

The Company expects that its Employees make proper use of any equipment provided to assist in Manual Handling tasks and to report any Manual Handling issues to the Company. The Company will as far as is reasonably practicable, and in compliance with the *Manual Handling Operations Regulations 1992*, ensure that:

- Employees are provided with suitable and sufficient information relating to the hazards associated with Manual Handling and the results of any Risk Assessments undertaken.

- Employees are provided with the necessary information, instruction and training to promote safe handling and lifting techniques.

4.8 MENTAL HEALTH AND WELLBEING



The Company will, as far as is reasonably practicable, establish arrangements to promote positive mental health and wellbeing for staff.

The Company is aware that the shape and content of work and individual health and well-being are strongly related and as such will develop a more proactive approach to workplace health.

This will translate into systems to ensure that staff can discuss mental health issues that they may face in both their home and work lives. These can include:

- Ensuring that the Company policy is clear, with stated aims and working practices.
- Leading by example.
- Promoting Employee involvement and contribution.
- Including women's health as a key factor.
- Encouraging Employee responsibility and involvement in the workplace.
- Creating equal pay environments.
- Ensuring continual improvement.

As an aid to positive mental health and wellbeing the Company will promote:

- The benefits of regular exercise.
- The benefits of healthy eating.
- The benefits of sleep – this being the biggest single contributor to improved wellbeing.

4.9 NEW/EXPECTANT MOTHERS



The Company will as far as is reasonably practicable, arrange to undertake a Risk Assessment for any Employee who has become a new or expectant mother, as required by the *Management of Health and Safety at Work Regulations 1999*.

New and expecting mothers are defined as:



women who are pregnant or have given birth within the previous six months, or are breastfeeding

The Company will as far as is reasonably practicable, and in compliance with the *Management of Health and Safety at Work Regulations 1999*, ensure that:

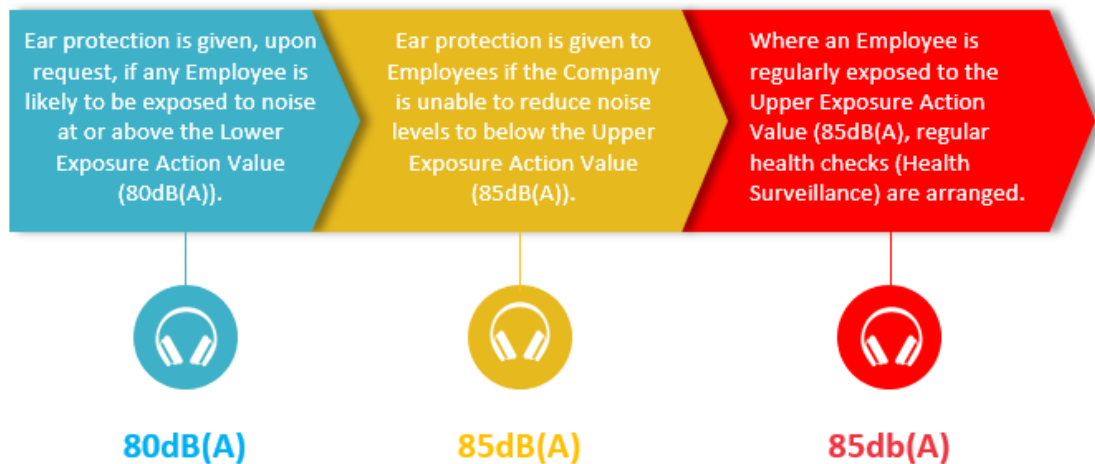
- Significant hazards for new and/or expectant Mothers are identified and assessed as risks.
- Female Employees of childbearing age are provided with any relevant known risk information.

The Company understands that if an identified risk cannot be designed out then the new/expectant mother will be entitled to a change in work conditions or be offered suitable alternative work.

If a change of duties cannot be arranged, then the new/expectant mother may be suspended from work on full paid leave for as long as is deemed necessary. This action may be taken once an Employee has given the Company notice in writing that she is pregnant, has given birth within the last six months or is breastfeeding.

If the Employee continues to breastfeed for more than six months after the birth then additional arrangements can be made with the Employee.

The Company appreciates that certain tasks carried out on-site are likely to result in the generation of excessive noise. When this situation occurs, the Company will as far as is reasonably practicable, arrange for a suitable Noise Assessment to be carried out in line with the requirements of the *Control of Noise at Work Regulations 2005*. The Company will as far as is reasonably practicable, and in compliance with the *Control of Noise at Work Regulations 2005*, ensure that:



The main aim of Health Surveillance is to detect early indications of noise induced hearing loss to allow the Employer to introduce measures to prevent further harm to the Employee including:

- None of its Employees are exposed to the Exposure Limit Value of 87dB(A).
- Noisy Work Equipment (WE), before purchase or supply, is assessed as regards its noise output and where necessary, alternative items are selected.
- Regular maintenance of WE is undertaken so as to limit the possibility of such items producing increased noise levels over their lifetime.

Such maintenance may include ensuring that holding down bolts and housings are secure to reduce additional noise due to reverberation and vibration.

- Its operations are properly planned so as to limit the number of noisy items of WE in use at any one time.

The *Smoke-free (Premises and Enforcement) Regulations 2006* and the *Smoke-free (Signs) Regulations 2007* ban smoking in all enclosed public spaces, such as workplaces (including vehicles used for business purposes). The Law bans smoking in all enclosed or "substantially enclosed" public space places and workplaces by making it an offense to:

- Smoke in "No Smoking" premises (or shared company vehicles).
- Permit others to smoke in "No Smoking" premises (or shared company vehicles).
- Fail to display warning notices in "No Smoking" premises (or shared company vehicles).

The Company will ensure, where appropriate:

- Provide external stubbing out bins at entrances to premises.

- "No Smoking" notices will be erected so that they are clearly visible to all employees, contractors and visitors, including at each entrance, in toilets, staff rooms (or shared company vehicles).
- Take all reasonable measures to ensure that employees or visitors to its premises do not smoke.
- Encourage and provide employees with information regarding stopping smoking. This would be via Tool Box Talks and would include the hazards associated with nicotine withdrawal.
- Remind Employees that the policy regarding the use of electronic cigarettes is the same as that as standard cigarettes containing tobacco in that they are only permitted in designated areas.

4.12 STRESS



Well-designed, organised and managed work helps to maintain and promote individual health and well-being. Pressures exist in the workplace that can positively affect performance. However, conditions can exist where prolonged exposure to high levels of pressure can result in negative performance (human error) and can ultimately lead to work-related stress.

Work-related stress can arise where work demands of various types and combinations exceed a person's capacity and capability to cope. Work-related stress can become apparent due to prolonged levels of pressure associated with:

- Insufficient attention to job design.
- Poor work organisation.
- Poor management techniques.

The Company has a general duty under the *Health and Safety at Work etc. Act 1974* to ensure, as far as is reasonably practicable, the health of their Employees at work. This includes taking steps to ensure they do not suffer stress-related illness as a result of their work.

The Company understands that stress can also originate from a person's home and personal life and that this can have a significant impact on their safety at work and will encourage Employees to report in confidence any issues that may have a bearing on safety and can be taken into consideration when allocating work, duties and responsibilities to Employees.

The Company will as far as is reasonably practicable, assess the risks to the Health and Safety of their Employees from the hazards they are exposed to whilst at work, this includes the risk of Employees developing stress-related illness because of their work, in accordance with the *Management of Health and Safety at Work Regulations 1999*.

4.13 VIBRATION



4.13.1 Hand Arm Vibration (HAV)

The Company appreciates that certain tasks are likely to involve the use of vibration emitting Work Equipment (WE) and as such, expose the operator to hand transmitted vibration.

The Company recognise that the regular exposure to Hand Arm Vibration (HAV) can present considerable risks to the health of Employees. Therefore, in accordance with the *Control of Vibration at Work Regulations 2005*, and as far as is reasonably practicable, the Company will:

- Attempt to eliminate vibration risk totally during its undertakings and where the risk cannot be totally eradicated, the Company will reduce the risk of harm from exposure to HAV to levels that are "as low as is reasonably practicable".

- Arrange Health Surveillance for those Employees who are exposed to levels of hand-transmitted vibration that exceed the recognised 'Exposure Action Value' (EAV).

The main aim of Health Surveillance is to detect early indications of a disease or condition, such as Vibration White Finger (VWF), to allow the Employer to introduce measures to prevent further harm to the Employee.

- Ensure that operators of vibration emitting Work Equipment (WE) are not exposed to levels of hand-transmitted vibration above the recognised 'Exposure Limit value' (ELV).
- Ensure that exposure to hand-transmitted vibration is monitored to check whether or not such exposure is being suitably controlled, in line with the requirements of Risk Assessments and any associated procedures.
- Ensure that Employees are provided with any information, instruction and/or training requirements identified during Risk Assessments, etc.

The Company, as far as is reasonably practicable, select Work Equipment (WE) on the basis of its suitability for long-term use as certain tasks may be undertaken over an eight (8) hour working day.

The Company encourage Employees to report, to the Director with Responsibility for Health and Safety, any early signs of HAV, such as tingling sensations in the fingers, often referred to as "pins and needles", or any other adverse reactions to periods of exposure to hand transmitted vibration.

The Company, as far as is reasonably practicable, select Work Equipment (WE) on the basis of its suitability for long-term use as certain tasks may be undertaken over an eight (8) hour working day.

4.13.2 Whole Body Vibration

The Company regularly uses vehicles to transport Employees and materials as part of normal operations. This can expose drivers in particular to Whole Body Vibration (WBV). The Company recognise that the regular long-term exposure to WBV can present considerable risks to the health of Employees. Therefore, in accordance with the *Control of Vibration at Work Regulations 2005*, and as far as is reasonably practicable, the Company will:

- Ensure the appropriate maintenance of vehicle suspension systems (as recommended by the manufacturer), including seats, cab and chassis suspensions.

Suspension seats often have a working life shorter than that of the vehicle they are fitted to. It is essential that the seat is kept in good working order and is replaced when worn out. Any vibration dampers in the seat can wear out and these may need to be replaced during the working life of the seat.

- Endeavour to share driving activities among Employees. However, the Company will give due consideration to any other work which may expose Employees to WBV.
- Encourage Employees to report any incidences of back pain. This will enable the Company to investigate whether exposure to WBV is being suitably controlled, in line with the requirements of Risk Assessments and any associated procedures or whether additional control measures are required.

4.14 WELFARE



In accordance with the *Workplace (Health, Safety and Welfare) Regulations 1992* special emphasis is given to ensure that Employees are supplied with suitable welfare facilities, including:

- Washing facilities.
- Drinking water.

- Changing facilities.
- Rest rooms.
- Eating facilities.

The Company ensures that the Company premises are maintained in a clean and efficient state, with a sufficient and properly maintained ventilation system, a reasonable temperature and a suitable and sufficient lighting arrangement.

4.15 WORKING TIME



In compliance with the *Working Time Regulations 1999*, The Company will ensure, as far as is reasonably practicable, that a limit is placed on individual Employees working time of forty-eight (48) hours per week, averaged out over a seventeen (17) week period (unless otherwise agreed by the individual).

The Company will also ensure that additional requirements of the *Working Time Regulations 1999* are implemented, such as minimum daily and weekly rest periods, breaks at work and also paid annual leave. The Company appreciates that any changes required to the number of working hours (i.e. as part of the seventeen (17) week reference period), can only be made following agreement with both the Company and the individual Employee concerned.

The Company will not exert undue pressure on any individual to accept working hours which fall outside of seventeen (17) week reference period.

4.16 YOUNG PERSONS



The Company may employ persons under eighteen (18) years of age. As a requirement of the *Management of Health and Safety at Work Regulations 1999*, as far as is reasonably practicable, the Company will ensure that:

- The risks to young people at work are assessed before they start work.
- The parents of school-age children are informed of the key findings of the Risk Assessment and the control measures taken, as required.

The Company appreciate that young workers (over minimum school leaving age and under 18) may not ordinarily work more than eight (8) hours a day, or forty (40) hours a week, nor work at night between 10pm - 6am or 11pm - 7am.

The Company will ensure, as far as is reasonably practicable, that:

- Apprentice workers are provided with suitable training at appropriate intervals.
- Apprentice workers are supervised by a competent person and are excluded from work activities that are regarded as too hazardous. For example, the use of Work Equipment (WE) with exposed dangerous parts.

5 CHECK - MONITOR PERFORMANCE

Performance is measured against agreed standards to reveal when and where improvement is needed.

Active self-monitoring reveals how effectively the Health and Safety management system is functioning.

This looks at both hardware (premises, plant and substances) and software (people, procedures and systems) including individual behaviour and performance.

If controls fail, reactive monitoring discovers why by investigating accidents, ill health or incidents which could cause harm or loss.

The objectives of active and reactive monitoring are:

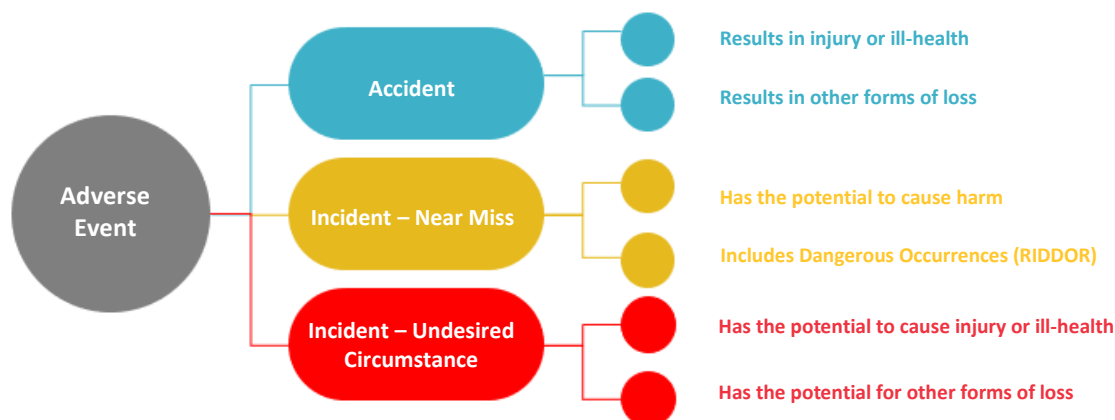
- To determine the immediate causes of sub-standard performance.
- To identify the underlying causes and the implications for the design and operation of the Health and Safety management system.
- To monitor longer-term objectives.



5.1 ACCIDENT AND INCIDENT MANAGEMENT



The Company will as far as is reasonably practicable, ensure that appropriate systems are in place to manage Accidents and Incidents during the Company's undertakings



5.1.1 Reporting

The Company require Employees, Contractors, Visitors, etc. to report any Accident or Incident occurring during the Company's operations.

In the event of a Reportable Injury or Dangerous Occurrence or a person contracting a Reportable Work-related Disease, the Company will as far as is reasonably practicable, and in accordance with the *Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013*, ensure that:

- The Health and Safety Executive (HSE) is notified via one of a selection of online forms; and
- In addition to the initial notification, the Company will forward to the HSE, a report on the appropriate and approved form F2508 (Injury or Dangerous Occurrence) or F2508A (Disease)

within fifteen (15) days of the Injury or Dangerous Occurrence occurring or of the person being diagnosed as suffering from a reportable Work-related Disease.

5.1.2 Recording

The Company will as far as is reasonably practicable, ensure that:

- All reported injuries are recorded in the Accident Book Form BI 510, as required by the *Social Security (Claims and Payments) Regulations 1979*, the *Social Security Administration Act 1992* and the *Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013*.

The Accident Book is held with the Director with Responsibility for Health and Safety and will be made readily available at all times. The Company will also, as far as is reasonably practicable, ensure that:

- Any entry made in the Accident Book is removed and held confidentially so as to ensure compliance with the *General Data Protection Regulations (GDPR)*.

Information regarding Accident/Incident Recording is given in *Appendix 1 - Organisation - Specific Duties (Accident/Incident Reporting & Investigation)* and in *Appendix 2 - Arrangements - Specific Duties (First-Aid, Accidents & Work-Related Ill Health)*.

5.1.3 Investigating

The Company will as far as is reasonably practicable, ensure that all adverse events (Accidents and Incidents) are investigated. The nature and outcome of an adverse event will determine whether a formal documented investigation is warranted.

The Company will identify underlying or root causes and where lessons to be learnt are identified, the Company will ensure that these are fed back to Employees so as to reduce the possibility of a recurrence.

5.2 SAFETY INSPECTIONS



The Company undertakes regular Health and Safety inspections and are aware that they are important to:

- Identify workplace hazards.
- Identify unsafe acts and conditions.
- Identify errors and omissions.
- Help prevent loss or injury.
- Promote workforce consultation with management.
- Reinforce management commitment to Health and Safety.
- Identify standards on which future Health and Safety performance can be measured.

The Company will undertake informal and formal inspections. Formal inspections, however, are more valuable as they provide a record of the process and can assist in obtaining statistics to use in a programme of improvement.

The inspections may be regular or random in frequency but are undertaken with respect to the level of risk associated with the type of work. The Company documents inspections against a standard Inspection Checklist to allow for performance comparisons to be made.

Formal inspections may be carried out at all levels within the Company - this provides a useful way to monitor safety standards through the Company hierarchy and also increases ownership and understanding of Health and Safety. Formal inspections will include looking at those arrangements in place including, but not limited to:

- **Documentation** This can include Policies, Assessments, Checklists, Permits, Examination Records, Training Certificates, etc.
- **Workplace** This can include the physical arrangements established for the work. Essentially a hazard spotting exercise it will identify areas where there are potential breaches of Health and Safety Legislation.
- **Behaviour** This can include an observation of how people are working and can provide an insight into the effectiveness of training programmes and individual and group attitudes to Health and Safety.

The results of the inspection process will include:

- **Items requiring immediate attention** Where conditions exist as to present a serious risk to Health or Safety then immediate action may be required to control it.
- **Items requiring attention in a defined timescale** Depending on the observation, a specific date may be set by which the remedial action should be taken.

As part of the process the Company will also check whether those who have been actioned in an Inspection Checklist have undertaken the remedial action to a suitable level and within the timescale specified. As well as to identify any unsafe acts, omissions or conditions, the Company uses the process of inspection to promote and reward good practice.

6 ACT - REVIEW AND AUDIT

It is important to review Health and Safety performance.

It allows an organisation to establish whether the essential Health and Safety principles (e.g. effective leadership and management, competence, worker consultation and involvement) have been embedded in the organisation.

A review informs an organisation whether the system is effective in managing risk and protecting people.



6.1 REVIEW



The organisation learns from all relevant experience and applies the lessons. There is a systematic review of performance based on data from monitoring and from independent audits of the whole Health and Safety Management System. These form the basis of self-regulation and of complying with Sections 2 to 6 of the *Health and Safety at Work etc. Act 1974* and other relevant statutory provisions.

There is a strong commitment to continuous improvement involving the constant development of policies, systems and techniques of risk control. Performance is assessed by:

- Internal reference to key performance indicators.
- External comparison with the performance of business competitors and best practice, irrespective of employment sector.
- Performance is also often recorded in annual reports.

It is the duty of the Director with Responsibility for Health and Safety to arrange for the Policy to be reviewed as often as appropriate and as a minimum at least once a year. Circumstances, which may cause the Policy to be reviewed, could include:

- New work practices, which can cause a change in the nature of Company operations and can, lead to changes in training requirements.
- New hazards in the workplace that require addition to the Risk Assessment and control measures identified. This in turn, may lead to additional responsibilities and duties of Employees being identified.
- Working experience that requires addition to the old Policy.
- New Legislation requirements, which require addition to the Policy and may require the identification of further duties within the Company.
- Company re-organisation that can lead to the redefinition of duties and responsibilities.

Monitoring of the Policy is the responsibility of the Director with Responsibility for Health and Safety. Observation of the workplace, feedback from Employees, noting any increase in accidents, sickness, etc. will be used by the Director with Responsibility for Health and Safety as important indicators to monitor the success of the Health and Safety Policy.

Each Employee is made aware of the location of the Company Health and Safety Policy. Each Employee is given a suitable timescale in which to read the Health and Safety Policy in order to fully understand the duties and arrangements that are contained in it.

Company Management is available to answer queries or issues that any Employee may have regarding its contents. Where clarification is required then the Company may also enlist the services of Health and Safety Advisors to ensure that the query can be answered in the most effective way that can be most easily understood.

After reading the Health and Safety Policy and ensuring that he/she is satisfied that they understand the contents, each member of staff signs and dates the "Declarations".

When amendments are made to the Policy Employees are informed of the change in issue status of the document and are given time to understand the changes made and any implications arising out of them. Subsequently Employees are required, once again, to sign and date the "Declarations".

6.2 AUDIT



All control systems tend to deteriorate over time or to become obsolete as a result of change. Auditing supports monitoring by providing managers with information on how effectively plans and the components of the Health and Safety Management System are being implemented. It should also provide a check on the adequacy and effectiveness of the management arrangements and Risk Control Systems (RCS). Auditing is an essential element of a Health and Safety Management System and is no substitute for the other essential parts of the system.

Merseyside Metal Services Ltd understands that systems need to be managed on a day-to-day basis and that a regular audit is vital to ensure that this can be maintained. The aims of auditing are to establish that:

- Appropriate management arrangements are in place.
- Adequate risk control systems exist, are implemented, and consistent with the hazard profile of the organisation.
- Appropriate workplace precautions are in place.

In conjunction with our Health, Safety and Environment Advisors (MD Safety Management Limited) a premises audit is undertaken on an annual basis. The auditing process involves:

- Collecting information about the Health and Safety Management System.
- Observations regarding premises physical processes, layout and hazards.
- Interviews with relevant Merseyside Metal Services Ltd staff.
- Making judgements about adequacy and performance.

In conjunction with our Health, Safety and Environment Advisors (MD Safety Management Limited) an annual documents audit is also undertaken to ensure that all documentation comprising the Health and Safety Management system is reviewed and updated to reflect changes in the Company as well as Health, Safety and Environmental Legislation and also industry best practices.

APPENDIX 1 ORGANISATION: SPECIFIC DUTIES

AREA OF RESPONSIBILITY	DETAILS
Management of Health and Safety	
The person responsible for monitoring the day-to-day management of Health and Safety, and instigating improvements where necessary is:	• David Thompson • Doug Thompson
The person(s) responsible for communicating Health and Safety information to Employees is:	• David Thompson • Doug Thompson
The person responsible for initially assessing and then monitoring the on-going Health and Safety performance of Contractors is:	• Doug Thompson
The person responsible for compiling and comparing annual Health and Safety accident statistics is:	• Doug Thompson
Employee Consultation	
The person responsible for ensuring effective consultation on Health and Safety matters is:	• David Thompson • Doug Thompson
Accident Reporting and Investigation	
The person responsible for ensuring that accidents are properly recorded in the Accident Book is:	• Doug Thompson
The person responsible for reporting reportable injuries, diseases and dangerous occurrences (RIDDOR) to the Health and Safety Executive (HSE)/Local Authority (LA) is:	• Doug Thompson

APPENDIX 2 ARRANGEMENTS - SPECIFIC DUTIES

AREA OF RESPONSIBILITY	DETAILS
Asbestos	
The person responsible for ensuring an appropriate Asbestos Survey of the premises is undertaken is:	Doug Thompson
Competency and Training	
Employee induction training will be carried out by:	Doug Thompson
Employee training records are held with:	Doug Thompson
Employee training needs will be assessed and identified by:	Doug Thompson
Where specific training needs are identified, the necessary training will be arranged by:	Doug Thompson
Employee Consultation	
Employee Health and Safety Representative:	Direct communication methods are used.
Health and Safety consultation with Employees will be carried out by:	Doug Thompson
Emergency Procedures - Fire and Evacuation	
The person responsible for ensuring that a Fire Risk Assessment (FRA) is carried out at the Company premises is:	Doug Thompson
Maintenance of Fire Fighting Equipment (FFE) is the responsibility of:	Doug Thompson/Celtic Fire and Security
The person responsible for arranging emergency evacuation drills (fire drills) is:	Doug Thompson
The person responsible for ensuring that appropriate fire arrangements are provided is:	Doug Thompson
The person responsible for ensuring the appropriate maintenance of fire arrangements is:	Doug Thompson
First-Aid, Accidents and Work Related Ill Health	
First-Aid Box(es) located at:	Office
The person responsible for ensuring that First-Aiders and/or Appointed Persons receive appropriate training is:	Doug Thompson
Accident Book held with:	Doug Thompson
Management of the Accident Book is the responsibility of:	Doug Thompson
First-Aiders:	Doug Thompson
The person responsible for investigating accidents, incidents and instances of work-related ill health is:	Doug Thompson
Information, Instruction, Training and Supervision	
The Health and Safety Law Poster is displayed in:	Main Office
Supervision of new and young Employees will be arranged and monitored by:	Doug Thompson

AREA OF RESPONSIBILITY	DETAILS
Manual Handling	
The person responsible for ensuring that Employees are trained in correct manual handling techniques, and that these techniques are used, is:	Doug Thompson
The person responsible for ensuring that Manual Handling Assessments are carried out, is:	Doug Thompson
Personal Protective Equipment (PPE)	
The person responsible for ensuring that only suitable PPE is issued and that such issuing of PPE is appropriately recorded, is:	Doug Thompson
The person responsible for ensuring that Employees are instructed in the correct use of PPE and that such PPE is worn as required, is:	Doug Thompson
Plant and Equipment	
The suitability of plant and equipment will be arranged to be assessed prior to purchase or hire by:	Doug Thompson
The person responsible for electrical Portable Appliance Testing (PAT):	Doug Thompson
The maintenance, inspection and testing of plant and equipment will be arranged by:	Doug Thompson
Pre-use inspections of plant and equipment will be carried out by:	All Employees
Defective plant and equipment should be reported with immediate effect to:	Doug Thompson
Risk Assessments (RA)	
RA's will be arranged to be undertaken by:	Doug Thompson
Requirements identified to reduce the level of risk presented will be managed by:	Doug Thompson
Risk Assessment reviews to be undertaken by:	Doug Thompson
Safe Handling and Use of Hazardous Substances	
All Hazardous Substances requiring a COSHH Assessment will be identified by:	Doug Thompson
COSHH Assessments will be arranged to be undertaken by:	Doug Thompson
COSHH Assessment reviews will be arranged to be undertaken by:	Doug Thompson
Transport	
If it is necessary to transport staff and/or materials by vehicle, either on or off site, the person responsible for ensuring that proper procedures are followed is:	Doug Thompson
Welfare Facilities	
Provision of suitable welfare facilities working will be arranged by:	- David Thompson - Doug Thompson

APPENDIX 3 USEFUL CONTACTS

Organisation		Website
Advisory, Conciliation and Arbitration Service		www.acas.org.uk
Asbestos Removal Contractors Association		www.arca.org.uk
Association for Project Safety		www.associationforprojectsafety.co.uk
British Safety Council		www.britsafe.org
Communities and Local Government		www.communities.gov.uk
Companies House		www.companieshouse.gov.uk
Contractors Health and Safety Scheme (CHAS)		www.chas.gov.uk
Department for Environment, Food and Rural Affairs		www.defra.gov.uk
Department for Transport		www.gov.uk/government/organisations/department-for-transport
GOV.uk		www.gov.uk
Driving for Work		www.gov.uk/government/organisations/department-for-transport
Environment Agency		www.environment-agency.gov.uk
Equality and Human Rights Commission		www.equalityhumanrights.com
Health and Safety Authority (HSA) (Ireland)		www.hsa.ie
Health and Safety Executive (HSE)		www.hse.gov.uk
Health and Safety Executive for Northern Ireland (HSENI)		www.hseni.gov.uk
Health and Safety Legislation		www.hse.gov.uk/legislation
Highways Agency		www.highways.gov.uk
HSE Area Offices		www.hse.gov.uk/contact/maps/index.htm
HSE Books		www.hsebooks.co.uk
HSE Public Register of Convictions		www.hse.gov.uk/prosecutions
HSE Public Register of Enforcement Notices		www.hse.gov.uk/notices

Organisation		Website
<i>Institution of Occupational Safety and Health (IOSH)</i>		www.iosh.co.uk
<i>International Institute of Risk and Safety Management (IIRSM)</i>		www.iirsm.org
<i>List of Local Authorities</i>		www.gov.uk/find-your-local-council
<i>NEBOSH Exam Board</i>		www.nebosh.org.uk
<i>News Distribution Service for Government and Public Sector</i>		www.govwire.co.uk
<i>Occupational Road Safety Alliance (ORSA)</i>		www.orsa.org.uk
<i>RIDDOR Reporting</i>		www.hse.gov.uk/riddor
<i>Royal Society for the Prevention of Accidents (RoSPA)</i>		www.rospa.co.uk
<i>Safe Contractor</i>		www.safecontractor.com
<i>Scottish Government</i>		www.scotland.gov.uk/Home
<i>Welsh Government</i>		http://wales.gov.uk
<i>MD Safety Management Limited</i>		www.mdsm.org.uk

APPENDIX 4 HEALTH AND SAFETY DEFINITIONS

As far as is reasonably practicable

The term "*as far as is reasonably practicable*" (SFAIRP) is the term most often used in the *Health and Safety at Work etc. Act 1974* and also in subordinate Health and Safety Regulations. This term is often interchanged with the term "*as low as is reasonably practicable*" (ALARP).

"Reasonably practicable" is a narrower term than "*physically possible*" a computation must be made by the owner in which the quantum of risk is placed on one scale and the sacrifice involved in the measures necessary for averting the risk (whether in money, time or trouble) is placed in the other, and that, if it be shown that there is a gross disproportion between them - the risk being insignificant in relation to the sacrifice - the defendants discharge the onus on them".

In essence, making sure a risk has been reduced ALARP is about weighing the risk against the sacrifice needed to further reduce it. The decision is weighted in favour of Health and Safety because the presumption is that the duty-holder should implement the risk reduction measure.

To avoid having to make this sacrifice, the duty-holder must be able to show that it would be grossly disproportionate to the benefits of risk reduction that would be achieved. Thus, the process is not one of balancing the costs and benefits of measures but, rather, of adopting measures except where they are ruled out because they involve grossly disproportionate sacrifices. Extreme examples might be:

- To spend £1M to prevent five (5) staff suffering bruised knees is obviously grossly disproportionate; but
- To spend £1M to prevent a major explosion capable of killing one hundred and fifty (150) people is obviously proportionate.

Of course, in reality many decisions about risk and the controls that achieve ALARP are not so obvious. Factors come into play such as on-going costs set against remote chances of one-off events, or daily expense and supervision time required to ensure that, for example, Employees wear ear defenders set against a chance of developing hearing loss at some time in the future. It requires judgment; there is no simple formula for computing what is ALARP.

Suitable and Sufficient

The term "*suitable and sufficient*" is not defined in the *Management of Health and Safety at Work Regulations 1999* from where it originates. However, the Approved Code of Practice (ACoP) to these Regulations suggests that, in the context of Risk Assessment, the level of detail in a Risk Assessment should be proportionate to the risk.

The level of risk arising from the work activity should determine the degree of sophistication of the risk assessment:

- For small businesses presenting few or simple hazards a suitable and sufficient Risk Assessment can be a very straightforward process based on informed judgement and reference to appropriate guidance. Where the hazards and risks are obvious, they can be addressed directly. No complicated processes or skills will be required.
- In many intermediate cases, the Risk Assessment will need to be more sophisticated. There may be some areas of the Assessment for which specialist advice is required; for example, risks that require specialist knowledge such as a particularly complex process or technique, or risks that need specialist analytical techniques such as being able to measure air quality and to assess its impact.

Competency

There are numerous definitions as to what constitutes "competent" or "competency":

- Properly or sufficiently qualified or capable or efficient.
- Suitably qualified and/or experienced.
- A specific range of skill, knowledge, or ability.
- Having the necessary skill or knowledge to do something successfully.

APPENDIX 5 HEALTH AND SAFETY LEGISLATION

Compliance with Health and Safety Legislation is a basic minimum requirement for any responsible organisation.

Merseyside Metal Services Ltd is committed to ensuring on-going compliance with the ever-changing requirements of Legislation. The Company is strongly aware that it is important that a register of Health and Safety Legislation applicable to the Company is identified and kept up to date.

The Company uses the Health and Safety Executive (HSE) website list of applicable Legislation as the basis of its Register:



www.hse.gov.uk/legislation/statinstruments.htm

The lists on the HSE website are linked to the Government's official legislation website:





working with



MD Safety Management Limited is a Health and Safety Consultancy with over 30 years' experience in Nuclear, Chemical, Construction, Retail, Leisure and Environmental Sectors we provide tailored and cost-effective services to our varied Client-base.

*MD Safety Management Limited is working with **Merseyside Metal Services Limited** in order to implement a Safety Management System and ensure that this is monitored and updated to comply with Health and Safety and associated Legislation.*

