Health and Safety Policy



This Health and Safety Policy is the property of

Securteam Limited

Churchill House 137 Brent Street London NW4 4DJ

Issue April 2023



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1 General Policy Statements

1.1 Health and Safety Policy Statement

Securteam Limited recognises and acknowledges its obligations under the Health and Safety at Work etc Act 1974 and the associated regulations.

Securteam Limited will take all reasonable measures to ensure the health, safety and welfare at work of all employees in fulfilment of its moral and legal responsibilities. These measures will be extended to afford the same protection to other persons affected by the Company's undertakings.

Securteam Limited will ensure that all employees understand their legal duty to work in a safe manner and to co-operate with others to create safe working conditions.

To ensure compliance with the aforementioned Act of Parliament, Securteam Limited will ensure that:

- 1. They provide and maintain a safe working environment, safe and well maintained plant and equipment and safe systems of work;
- 2. They identify hazards and implement reasonably practicable control measures by carrying out and documenting risk assessments for all Company activities;
- 3. They provide all staff with adequate instruction, information, training and supervision;
- 4. The same emphasis is given to safety as to other management functions and that safety takes precedence over convenience and profitability;
- 5. All safety rules and regulations whether internal, client's or regulatory are adhered to in detail;
- 6. They promote the awareness of health and safety and encourage health and safety best practice throughout the organisation;
- 7. They have access to competent advice and are able to secure compliance with their statutory duties.

The policy will be kept up to date as there are legislative changes and as the business changes in nature and size. To ensure this, the policy and the way it has operated will be reviewed at least on an annual basis.

On behalf of Securteam Limited

Yohai Nir Managing Director

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1.2 Company Procedures

The Company will:

- 1. Provide and maintain safe and healthy working conditions at its premises, in accordance with statutory legislation.
- 2. Ensure that employees are aware of the potential hazards involved with the work, both in-house and on third party premises, ensure that safety training is provided as necessary, stating at an initial induction session for new employees and through refresher training courses. Records shall be kept of all such training.
- 3. Provide all necessary personal protective equipment and other safety equipment and provide appropriate training in its proper use.
- 4. Take a pro-active approach to maintaining awareness of current developments in statutory legislation, guidance and general trends regarding health and safety, through the medium of trade journals and Health and Safety Executive publications.
- 5. Undertake appropriate risk assessments to enable the Company to establish and maintain a safe and healthy working environment.
- 6. Conduct periodic safety inspections and safety audits.
- 7. Consult with employees and others on safety related matters.
- 8. Ensure that awareness of safety amongst personnel is maintained at a high level.
- 9. Ensure that all employees read and understand the contents of the Company Safety Policy document.
- 10. Maintain a relationship with appropriate organisations, including the enforcing authorities, to enable changes in legislation and approaches to health and safety to be considered and implemented as necessary.

1.2.1 Procedures for Dealing with health and Safety Issues

Where an employee raises a matter related to health and safety, the Company will:

- a) Take all necessary steps to investigate the circumstances.
- b) Take corrective measures where appropriate.
- c) Advice the employee of actions taken.

Where any employee notices a problem that may have an impact on health and safety, they must inform their manager. In the case of an adverse health condition, they should advise their manager and consult their own general practitioner.

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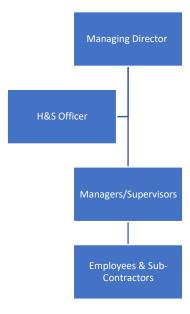
2. Organisation & Responsibilities

2.1 Corporate Structure (Health & Safety)

Responsibility for the overall effectiveness of the Company Health and Safety Policy rests with the Managing Director; Mr Yohai Nir. Every employee and sub-contractor is responsible for health and safety and for complying with the Company Policy and any statutory requirements.

Whilst the ultimate responsibility for health and safety rests at the highest level, individuals at every other level will need to accept varying degrees of responsibility for the implementation of the Health and Safety Policy and for ensuring safe working practices.

The following diagram shows the corporate structure (health and safety) for the Company.



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To ensure the successful implementation of this policy, the positions below have the following outline responsibilities.

2.2 The Managing Director

The Managing Director has the responsibility to ensure that:

- 1. He keeps abreast of any legislative changes and is familiar with legislation applicable to this organisation.
- 2. He maintains an organisation that meets all the statutory requirements contained in the various pieces of health and safety legislation.
- 3. The organisation's Health and Safety Policy is developed and brought to the attention of all of the employees.
- 4. All employees read, understand and implement the contents of the Health and Safety Policy.
- 5. He encourages a positive health and safety culture within the organisation, to reduce the risk of injury or ill health to employees.
- 6. The organisation has effective arrangements to deal with health and safety issues, hazards and emergencies that may arise as a result of our undertaking. This includes ensuring that regular monitoring of health and safety performance is carried out.
- 7. All Managers within the organisation carry out regular monitoring of health and safety matters.
- 8. That the organisation has sufficient Employer's and Public Liability Insurance cover for the extent of the business undertaking.
- 9. Adequate funding is available to deal with health and safety issues that affect the organisation, its employees and others who might be affected.
- 10. Suitable and sufficient risk assessments are carried out with respect to materials used and tasks undertaken and that the assessments are complied with and reviewed regularly.
- 11. Personnel receive all necessary training relevant to the safe conduct of the Company's undertakings.
- 12. Competent specialist health and safety advice is obtained when in-house expertise is considered insufficient.
- 13. Due note is taken of the outcome of consultation with employees regarding health, safety and welfare.

The Managing Director will update the Company Health and Safety Policy at least on an annual basis.

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2.3 Health and Safety Officer

The H&S Officer has the responsibility to ensure that:

- 1. He encourages a positive health and safety culture within the organisation, to reduce the risk of injury or ill health to employees.
- 2. All electrical installations and all electrical equipment used by the Company are suitable in terms of design, installation and maintenance.
- 3. Electrical systems and equipment are tested in line with current guidance.
- 4. Co-ordinated arrangements are in place to deal with fire and other emergency situations on all Company work areas.
- 5. There is adequate provision of First Aiders (or) 'Appointed Persons' and first aid equipment.
- 6. The arrangements to identify, report and deal with hazards are in place.
- 7. Any hazardous substances used by the Company are controlled within recognised safety standards and are securely stores.
- 8. Ensure that situations which pose occupational health risks to employees are suitably and sufficiently dealt with in the appropriate manner.
- 9. Ensure that all employees receive adequate training to enable them to carry out their work tasks. This will include suitable and sufficient training at induction.
- 10. Ensure that up to date records of employee training are maintained.
- 11. Ensure that adequate control measures are in place to deal with issues relating to transport within the organisation.
- 12. Ensure that all accidents and incidents are thoroughly investigated and necessary documentation is completed. This will include accident investigation and may include reporting to the appropriate authorities.
- 13. Ensure that any Policy arrangements that are likely to affect contractors and visitors are effectively communicated.
- 14. All necessary personal protective equipment (PPE) is available to Company personnel.
- 15. All equipment purchased or used by the Company, is safe for its intended use and is maintained in accordance with manufacturers or statutory requirements.
- 16. Suitable and sufficient risk assessments are carried out with respect to materials used and tasks undertaken and that the assessments are complied with and reviewed regularly.
- 17. Regular health and safety inspections and audits are carried out in accordance with Company and statutory requirements.
- 18. Regular fire drills are carried out and that all fire alarms and fire fighting equipment are regularly maintained as appropriate.
- 19. Sub-contractors provide (where relevant) all necessary safety equipment, documentation, satisfactory work and method statements.

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2.4 Managers and Supervisors

Managers and Supervisors will have the responsibility of overseeing the practical implementation of the policy. They will ensure that:

- 1. All employees read, understand and implement the contents of the policy.
- 2. Staff receive all necessary training relevant to the safe conduct of the Company's undertakings.
- 3. All necessary personal protective equipment (PPE) is available to Company personnel.
- 4. Suitable and sufficient risk assessments are carried out for the tasks under their control and reviewed regularly.
- 5. Regular health and safety inspections are carried.
- 6. Accident records are completed and sent to head office.
- 7. Accidents and incidents are investigated, when necessary and any corrective action is implemented.
- 8. Adequate first aid facilities are available to all staff and that the location of such facilities is known.
- 9. All staff are aware of the emergency procedures for their workplace
- 10. All hazardous substances, under their control, are handled, used and stored in the correct manner according to a safe system of work.
- 11. Risk assessments are carried out for new and expectant mothers.
- 12. Adequate provision is made to assess and control the risks associated with young persons
- 13. All employees receive adequate training to enable them to carry out their work tasks. This will include suitable and sufficient training at induction.
- 14. Safety information is actively communicated to all staff under their control.
- 15. All machinery under their control is adequately guarded, inspected and tested and used in accordance with a safe system of work.

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2.5 All Employees

Although a large majority of the legal health and safety duties fall on employers, health and safety legislation does place duties on you as employees. These would include:

- 1. Taking reasonable care for the health and safety of yourself and others, while working.
- 2. To co-operate with the Company in the implementation of the Company Safety Policy and with safety legislation.
- 3. To make use of all equipment, procedures or protective measures provided in the interest of your health and safety.
- 4. To bring to the attention of your employer any apparent health and safety problems.
- 5. Not to intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety and welfare.
- 6. Not to use any machinery, equipment, dangerous substances, transport equipment, means of production or safety devices, unless they have been trained (or instructed) to do so by the Company.

In order to reduce accidents and incidents, you must follow the training you have been given, procedures that have been implemented and the requirements of risk assessments and method statements. In particular, this policy requires you to be aware that:

- 1. You have a legal responsibility to work safely at all times,
- 2. You can be prosecuted for working in an unsafe manner or with disregard for others that could cause an accident.

2.6 Sub-Contractors

The Company shall place the following obligations on all of its Sub-Contractors:

- 1. To comply with all conditions imposed by the Company Safety policy and any relevant statutory legislation.
- 2. Provide a copy of their Company safety policy, the contents of which must comply with or exceed the requirements of the Company policy.
- 3. Provide work method statements and associated risk assessments for consideration by the Company prior to commencement of work.
- 4. Use safe systems of work and carry out work in a way, which avoids risk to themselves or others who may be affected by the work.
- 5. Provide any personal protective equipment or other safety equipment necessary for the safe conduct of their activities.
- 6. Inform the Company management of any hazards, potential or actual, in order that action can be taken.

Note: The requirement for a written safety policy and any method statements etc. shall only apply where there is a legal obligation on companies to provide these in this format. Notwithstanding this, the Company shall assure themselves of the adequacy of the health and safety 'philosophy', and its practical application, for any sub-contractor.

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3 Arrangements & Procedures

3.1 Introduction

This section details how the Company intend to put this policy into practice in the workplace, specifying how health and safety issues will be managed. It is the policy of the Company to perform work in the safest manner possible as far as is reasonably practicable.

Responsibility for safety on the premises is delegated to line supervision in accordance with the Organisation chart outlined in Section 2. Managers and Supervisors are responsible for the safe conduct of work on the premises and this responsibility cannot be delegated to others.

3.2 Means for Policy Revision

The Health and Safety at Work etc. Act 1974 required the Company to monitor the effectiveness of this policy in terms of its usefulness and effectiveness.

The safety performance of the Company and functioning of the policy will be reviewed by the Health and Safety Officer and Senior Managers at the Senior Management meetings which are held every month.

The Health and Safety Officer will consult the operational managers prior to these meetings to obtain their feedback and the feedback from employees that managers have elicited, during management visits to client sites.

Feedback to employees will be via a Company newsletter with a dedicated health and safety section.

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3.3 General Workplace Health and Safety

In order to ensure that a safe and healthy working environment exists for all staff and any visitors, within the workplace, good housekeeping standards will be maintained. The 'workplace' refers to any area where the Company work is being carried out including staircases, floors, workshops, ways in and out, washrooms (all welfare facilities), temporary work areas and client's premises. A safe working environment will be effected by:

- 1. Keeping traffic routes, including entrances and exits, clear of all obstacles;
- 2. Ensuring the safe storage of items when not in use, allowing only the lightest or least used items to be stores above head height and making these items easily retrievable;
- 3. Ensuring the regular disposal of waste materials by not allowing a build-up of any, particularly combustible, materials;
- 4. Ensuring that all welfare facilities are kept to a high standard of cleanliness and are safe for all persons to use.
- 5. Ensuring that the workplace is inspected regularly and any faults identified rectified, as soon as possible.

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3.4 Asbestos

3.4.1 General Statement

The Company acknowledges the health hazards arising from exposure to asbestos and will protect employees and other persons from potential exposure to asbestos, as far as reasonably practicable. This will be achieved by identifying areas, within Company workplaces, that may contain asbestos so that control measures can be put in place to prevent any inadvertent contact with the substance.

This policy requires the full cooperation of management and staff at all levels. The person responsible for the implementation of this policy is defined in the Organisation and Responsibilities Section.

3.4.2 Arrangements for Securing the Health and Safety of Workers

The measures will include:

- Identification of asbestos in the workplace. On Company premises this will be done by carrying out a survey of the building and identifying any areas where asbestos may be present. A register of these locations will be kept. If necessary, specialist advice will be obtained to carry out the survey.
- 2. Information on the location of asbestos and the likelihood of it being disturbed will be requested from clients during the tendering process.
- 3. Assessing the risks involved and implementing the control measures identified, including a plan of work.
- 4. Removing asbestos, if necessary. Generally this should be done by a specialist Company utilising suitable protective measures. However, some low risk asbestos containing materials can be removed by a competent builder.
- 5. Establishing control measures which would include: encapsulating asbestos that is not removed, placing appropriate signs to warn of the presence of asbestos, having a management plan in place to monitor the condition of any retained asbestos and to ensure that contractors are made aware of the location of asbestos.
- 6. Providing employees with any information and training required to ensure that they are not exposed to asbestos. Records of training should be signed by employees and retained by the Company.

3.4.3 Safe Systems of Work

Despite legislation being in place requiring the identification of asbestos containing materials, this may not be the case in every contract the Company work on. When working on client's premises the following procedures will be followed:

- 1. If areas or items, labelled as Asbestos Containing Materials (ACM), are damaged then work in that area should be stopped, the supervisor or area manager should be informed.
- 2. If materials that may contain asbestos are damaged then work should be stopped and the supervisor or area manager should be informed.

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- 3. If dust or debris is found on the ground and there is reason to suspect that it may be an asbestos containing material then work must be stopped and the supervisor or area manager informed.
- 4. Suspected Asbestos Containing Materials **MUST NOT** be swept up or vacuumed.
- 5. The supervisor or area manager must inform Securteam Limited head office and the client as soon as possible and ensure, as far as practicable, that the suspected contaminated area is cordoned off and warning notices displayed.
- 6. The client will be expected to engage a competent asbestos consultant to sample and test the material(s) before cleaning work is allowed to continue.
- 7. Securteam Limited will only allow work to continue on the advice of the competent person and when additional safety measures have been implemented as necessary.

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Infection Control

3.4.4 General Statement

We recognise, due to the nature of our business, that situations may arise that pose a higher than normal risk of microbiological infection e.g. needle stick injuries and other exposure to human or animal waste. We realise the seriousness of these situations and will take all the necessary precautions.

3.4.5 Arrangements for Securing the Health and Safety of Workers:

The Company will, in consultation with workers:

- Identify the tasks that are likely to pose a significant risk or infection.
- Assess the risks involved and the control measures that need to be put into place.
- Ensure that adequate controls are in place to deal with sharps and all forms of body fluids and human or animal waste.
- Implement measures to ensure co-operation with the Emergency Services and Area Health Authority should a situation arise
- Ensure that our employees fully understand the reporting procedure, so as to enable them to report any ill health condition or hazard that they may be aware of.
- Issue appropriate safety equipment to the personnel involved and keep records of the issue.
- Provide adequate supervision of all cleaning operations.

3.4.6 Information and Training

- Infection awareness training is provided to all members of staff working in these situations.
- A recognised communication channel is available for staff and managers.
- Information and training is provided in the safe techniques required to prevent needle stick injuries, the safe handling of discarded sharps, safe methods of cleaning up body fluids and the safe disposal of human waste and sharps.

3.4.7 Safe Systems of Work

- Employees must make sure that they are aware of the infection control policy of each location and must comply with the policy.
- Management will periodically review the infection control policies and procedures
- Ensure all work takes into account the infection control arrangements.
- Cleaning equipment should be kept for the sole use of each site and, where possible, for sole use within a department, to prevent the possibility of cross contamination.
- Mop heads should be changed and cleaned or disinfected daily, where possible single use wipes and cloths should be used.
- Buckets and mop handles and other equipment should be cleaned and dried daily.
 Storage must be in a secure area with restricted access.
- Use the personal protective equipment and other cleaning and disposal equipment provided.

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• Only use the approved cleaning products that have been supplied for the work and use them in accordance with your training.

3.5 Selection and Control of Sub-Contractors

3.5.1 General Statement

The Company acknowledges that they have a responsibility to select sub-contractors that are suitable to carry out the contracted work and to control the activities of the sub-contractors while they are on site. The Company recognises that it cannot pass on its health and safety responsibilities by signing contract. In addition the Company must ensure that, if any work is further sub-contracted, that adequate procedures are in place to select and control any additional sub-contractors.

Clients, contracts and sub-contractors all have duties and responsibility under health and safety law but the extent of the responsibilities of each party will depend on the circumstances.

3.5.2 Arrangements for the Selection of Sub-Contractors

The Company has the following arrangements in place for the selection and control of sub-contractors.

- 1. They will identify all aspects of the work that the sub-contractor will be required to carry out including preparation and completion phases. This will involve assessing the risks, deciding what information, instruction and training is required how to co-ordinate and communicate with all parties and the level of management and supervision required.
- 2. Sub-Contractors are assessed to ensure that they are competent (i.e. they have sufficient skills and knowledge) to do the job safely and without risks to health and safety. The degree of competence required will depend on the work to be done as will the assessment method. Assessment may be on the basis that the sub-contractor has worked with the Company previously and is known to have robust health and safety performance. In other cases a more formal process is used involving the completion of health and safety questionnaires. These will include questions on the following topics:
 - Experience in the type of work;
 - Details of their health and safety policies and practices;
 - Details about their recent health and safety performance (number of accidents etc);
 - The qualifications and skills they have;
 - Their selection procedure for sub-contractors;
 - Examples of their safety method statements;
 - Details of their health and safety training and supervision;
 - Their arrangements for consulting their workforce
 - Details of their health and safety advisers and external assessment;
 - If they are members of a relevant trade or professional body;
 - Details of their employees training and whether they hold a 'passport' in health and safety training.

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- 3. If any part of the work is to be further sub-contracted then evidence is obtained that a suitable sub-contractor selection process is employed.
- 4. Sub-Contractors are informed of the health and safety performance that is expected. They are given a copy of the Health and Safety Policy so that they can review the arrangements in place.
- 5. Risk assessments will be carried out and then meetings will be held with sub-contractors to consider the risks, from each others work, that could affect the health and safety of the workforce or anyone else. Agreement will then be reached on the control measures required.

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3.5.3 Information and Training

The Company will provide its sub-contractors with the information and instruction that their employees require to ensure their health and safety. If necessary, training will be provided or proof of training will be requested.

Information and instructions, about the risks arising from their work, will include safety rules and procedures and procedures for dealing with emergencies. This exchange of information will include details of any risks that the sub-contractors could not reasonably be expected to know about.

3.5.4 Safe Systems of Work

 Every effort will be made by both management and employees to co-operate and coordinate with sub-contractors, clients and other interested parties by informing them of health and safety issues relevant to the Company's operations on site. The precise nature of the communication to be used will be dependent on the requirements of the site and/or the client.

The methods of communication are agreed, with all concerned parties, before work starts and supervisors and operatives are made aware of these procedures. Communication methods usually consist of:

- a. Formal safety meetings, which are documented;
- b. Informal verbal communication (Which may be documented and distributed subsequently, if required);
- c. Memos;
- d. Formal letters.

Communication between management and employees of the Company will be such that legislated requirements are adhered to and that employees are aware of matters having an impact on their health and safety during the course of works. Further details about this can be found in the "Communication and Consultation" section of this Policy.

- Trade contractors/sub-contractors carrying out work for our Company are expected to have a communications procedure in place, which is suitable and sufficient for the individual work circumstances. Proof of these communication procedures is part of the vetting procedure.
- 3. All work under the control of the Company will be managed and supervised by the Managing Director or an appointed Manager. The more impact this work may have on the health and safety of anyone likely to be affected, the greater will be the level of supervision. Where the Company has greater knowledge about the health and safety implications of the contracted work that the sub-contractor (e.g. labour only sub-contracts) the greater the level of supervision will be.
- 4. If necessary, the extent of the control measures required will be agreed in advance. Where work may conflict with or impact others than a 'Permit to Work' system will be used.
- 5. All parties will monitor their health and safety performance. This will include:
 - a. Reviewing risk assessments;
 - b. Checking that control measures are working;

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- c. Carrying out inspections;
- d. Reviewing accident and incident reports;
- 6. If health and safety requirements are not being met, then meetings will be held with the sub-contractor to analyse reasons. Corrective measures will be agreed and then performance will be reviewed again. If improvements are not seen then the sub-contractor will be prevented from working.
- 7. Sub-contractor's work and health and safety performance is reviewed after completion to see if performance could be improved in the future.

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3.7 Training

3.7.1 General Statement

The Directors will ensure that all employees receive job specific training and training on health and safety to assist them in undertaking their duties safely and efficiently. External courses on specific subjects may be utilised along with internal training, as and when appropriate. All training will be recorded in the relevant personnel files.

Although the Directors have a major role to play within the Company's health and safety policy, each Manager is responsible for ensuring that their subordinates receive appropriate training and induction and should, therefore, liaise with the Directors regarding training needs.

Managers are required to carry out a site specific induction with all new employees, highlighting any hazards and specific safety rules applicable to the work, before putting them to work.

3.7.2 Arrangements

The Company will, in consultation with workers:

- 1. Identify all tasks for which training must be provided to ensure that our employees achieve the necessary level of competence to carry them out.
- 2. Provide training in the use and maintenance of all equipment, machinery and chemicals.
- 3. Evaluate training course to ensure that the training provided is suitable and sufficient and that the trainer is competent.
- 4. Have procedures in place to ensure that only properly trained and competent persons use equipment and machinery.
- 5. Provide training in the use of personal protective equipment and other safety measures
- 6. Maintain records of training and ensure that they are signed by the trainer and the trainee. These records will be retained by the Company indefinitely. All training results and certificates from external courses will also be retained.

Responsibility for implementing these arrangements is defined in the Organisation and Responsibility Section.

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3.8 Accident Reporting & Investigation

3.8.1 Introduction

The Directors and Managers are responsible for ensuring that accidents are reported to the relevant enforcing authority (as applicable) within the laid down time periods as prescribed by law and are investigated as per standard Company procedure. The Managing Director will also be responsible for checking whether accidents/injuries are reportable or not by referring to the list of reportable injuries/diseases/dangerous occurrences in the Schedules to The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations, 2013. (A non-exhaustive list of these is included at the end of this section).

The Managing Director will also be responsible for ensuring that the Company accident reporting procedures are communicated to the Company employees.

The Company will keep a record of any reportable injury, disease or dangerous occurrence. This will include the date and method of reporting the date, time and place of the event, personal details of those involved and a brief description of the nature of the event or disease. Where remedial action is required to prevent a reoccurrence of the accident/injury/disease/dangerous occurrence, then the Company will be responsible for ensuring that such remedial steps have been put in place as well as monitoring of such measures for compliance and continued effectiveness.

3.8.2 Reporting of Accidents & Dangerous Occurrences

In the event of an employee of the Company suffering any of the following categories of injury, then certain procedures must be followed as described:

- 1. Fatal Injury;
- 2. Major injury (including fractures, amputations, loss of eyesight, hospitalisation for a period of 24 hours or more, etc)
- 3. An injury resulting in the employee being absent for Seven (7) working days or more;
- 4. Occupational illness or disease (including dermatitis, occupational deafness, vibration white finger etc.);
- 5. Any other accident resulting in damage to property or injury to employees and/or members of public.

Initially the accident MUST be reported to the Supervisor as soon as possible and be recorded in the Accident Book.

Managers and Supervisors are required to report the accident to the Managing Director, who will decide if the injury/accident is reportable or not. If the accident/injury is reportable to the enforcing authority then an official reporting form (F2508, F2508A, etc) will be completed and sent to the enforcing authority within the period specified by law.

Sufficient action should be taken to make the area safe but nothing is to be moved unnecessarily before the Managing Director has been informed. At their discretion, the Managing Director may call in the Company Health and Safety Officer or take control of the situation themselves.

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The Company will take the appropriate steps to ensure that the accident/injury is investigated as soon as is reasonably practicable, that the results of that investigation are recorded on the Company's internal accident investigation form and that remedial measures are put into place to prevent a reoccurrence of the injury/accident.

If the Supervisor is not in the area at the time of the accident/injury then the employee suffering the accident/injury MUST report the accident in the Accident Book and to the Managing Director as soon as possible. A work colleague can undertake this responsibility if the injured person is unable to do this themselves.

Where an incident has occurred, which is classified as a dangerous occurrence, then that incident must be reported to the Managing Director WITHOUT DELAY, even if no one was injured.

3.8.3 Action in the Event of an Accident, Injury, Disease or Dangerous Occurrence

Death or Major Injury

If there is an accident connected with work and an employee or a self-employed person, working on Company premises, is killed or suffers a major injury (including as a result of physical violence) or a member of the public is killed or taken to hospital then the Company will notify the enforcing authority without delay (e.g. by telephone). Within 15 days, a completed accident report form (F2508) will be sent to the enforcing authority.

Over Seven (7) Days Injury

Where an accident connected with work (including an act of physical violence) results in an employee or self-employed person, working on Company premises, being unable to work or carry out their normal duties for more than Seven (7) consecutive working days, excluding the day of the accident but including any days which would not have been working days, a completed accident report form (F2508) shall be sent to the enforcing authority within 15 days.

Occupational Disease

If a doctor notifies an employee that he/she suffers from a reportable work-related disease then a completed disease report form (F2508A) will be sent to the enforcing authority. A full list is included with the pad of report forms and in the guide to the Regulations. Alternatively, the local Health and Safety Executive will be contacted to confirm if the disease is reportable.

Dangerous Occurrence

If something happens which does not result in a reportable injury but which clearly could have done, then it may be a dangerous occurrence that must be reported immediately (e.g. by telephone) to the enforcing authority. A full list is included with the pad of report forms and in the guide to the Regulations, or the local Health and Safety Executive will be contacted to confirm if the event/incident is reportable.

3.8.4 Definitions of Reportable incidents

Reportable Major Injuries are:

- Fracture other than to fingers, thumbs or toes;
- Amputation;

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- Dislocation of the shoulder, hip, knee or spine;
- Loss of sight (permanent or temporary);
- Chemical or hot metal burn to the eye or any penetrating injury to the eye;
- Injury resulting from an electric shock or electrical burn leading to unconsciousness or requiring resuscitation; or requiring admittance to hospital for more than 24 hours;
- Any other injury leading to hypothermia, heat induced illness or unconsciousness; or requiring resuscitation; or requiring admittance to hospital for more than 24 hours;
- Any other injury leading to hypothermia, heat inducted illness or unconsciousness or requiring resuscitation; or requiring admittance to hospital for more than 24 hours;
- Unconsciousness caused by asphyxia or exposure to harmful substances or biological agent;
- Acute illness requiring medical treatment, or loss of consciousness arising from absorption of any substance by inhalation, ingestion or through the skin;
- Acute illness requiring medical treatment where there is reason to believe that this resulted from exposure to a biological agent or its toxins or infected material.

Reportable Dangerous Occurrences are:

- Collapse, overturning or failure of load-bearing parts of lifts and lifting equipment;
- Explosion, collapse or bursting of any closed vessel or associated pipe work;
- Failure of any freight container in any of its load bearing parts;
- Plant or equipment coming into contact with overhead power lines;
- Electrical short circuit or overload causing fire or explosion;
- Any unintentional explosion, misfire, failure of demolition to cause the intended collapse, projection of material beyond a site boundary, injury caused by an explosion;
- Accidental release of a biological agent likely to cause severe human illness;
- Failure of industrial radiography or irradiation equipment to de-energise or return to its safe position after the intended exposure period;
- Malfunction of breathing apparatus while in use or during testing immediately before use;

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- Failure or endangering of diving equipment, the trapping of a diver, an explosion near a diver, or an uncontrolled ascent;
- Collapse or partial collapse of a scaffold over fire meters high, or erected near water where there could be a risk of drowning after a fall;
- Unintended collision of a train with any vehicle;
- Dangerous occurrence at a well (other than a water well);
- Dangerous occurrence at a pipeline;
- Failure of any load-bearing fairground equipment, or derailment or unintended collision of cars or trains;
- A road tanker carrying a dangerous substance overturns, suffers serious damage, catches fire or the substance is released;
- A dangerous substance being conveyed by road is involved in a fire or released.

The following dangerous occurrences are reportable except in relation to offshore workplaces:

- Explosion or fire causing suspension of normal work for over 24 hours;
- Sudden, uncontrolled release in a building of; 100kg or more of flammable liquid, 10kg of flammable liquid above its boiling point; 10kg or more of flammable gas; or 500kg of these substance of the release is in the open air;
- Accidental release of any substance that may cause damage to health.

Reportable Diseases Include;

- Certain poisonings;
- Some skin diseases such as occupational dermatitis, skin cancer, chrome ulcer, oil folliculitis/acne;
- Lung diseases including; occupational asthma, farmer's lung, pneumoconiosis, asbestosis, mesothelioma;
- Infections such as leptospirosis, hepatitis, tuberculosis, anthrax, legionellosis and tetanus;
- Other conditions such as occupational cancer, certain musculoskeletal disorders, decompression illness and hand-arm vibration syndrome.

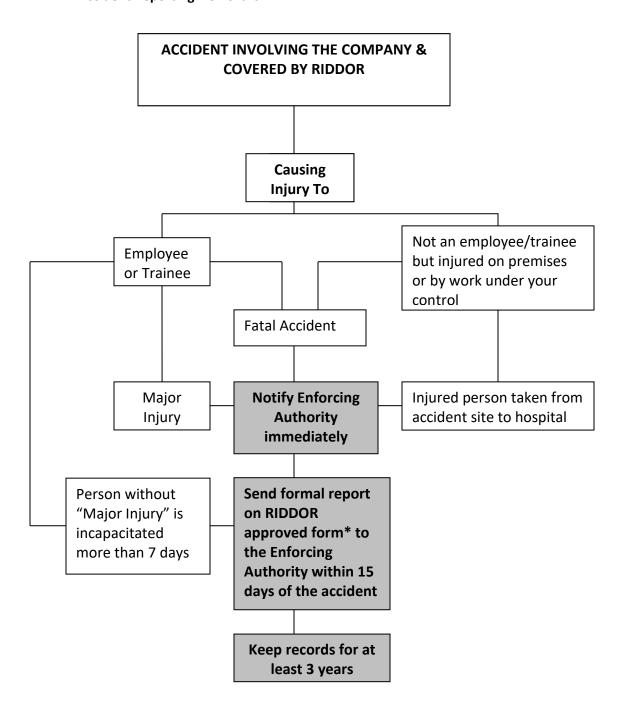
3.8.5 Information for Employees

On requested employees shall be issued with information, either HSE pamphlet or in-house procedure, advising the requirements of the regulations and detailing the lists of reportable accidents, incidents etc.

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Accident Reporting Flowchart



^{*}Form F2508 – Report of an Injury or Dangerous Occurrence. Form F2508A – Report of a Case of Disease.

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3.8.6 General Statement

It is the policy of the Company to ensure that suitable arrangements are made regarding fire prevention and means of escape should a fire start on Company premises or client sites. All personnel are required to read and comply with all notices and instructions.

The information contained in this policy is of a general nature and Directors and Managers must ensure that employees know the emergency procedures for their work area.

3.8.7 Arrangements for Security the Health and Safety of Workers

The Company will ensure that:

- 1. The means of escape in the event of a fire are well defined within all premises by the display of appropriate signs and notices;
- 2. Sufficient firefighting equipment is available within all premises and that it is inspected by a suitable contractor at least once per year;
- 3. Suitable and clear fire evacuation instructions are displayed throughout all premises;
- 4. Training and instruction are given to staff in respect of means of escape, the use of firefighting equipment and the fire drill procedure;
- 5. End of day checks are carried out at all premises. These checks should include:
 - a. Electric, gas or oil equipment not required in permanent operation is switched off;
 - b. Equipment left operational in empty premises is safe;
 - c. Fire doors and smoke stop doors are closed;
 - d. Windows and doors are locked and secure.

For all Company offices the assembly area in case of fire or other evacuation emergency will be displayed on relevant notices. On client's premises or sites, staff should be aware of the local instructions for evacuation and these must be followed.

3.8.8 Action In The Event of Fire

- 1. If you discover a fire:
 - a. Close doors and windows to the room if at all safe to do so.
 - b. Break the glass of a fire alarm call point.
 - c. Dial 999 and give details to the Emergency Services.
 - d. Leave the building and go to the assembly point.

Important: You may tackle the fire with an extinguisher but only if it is SAFE to do so and you have been trained to do so.

- 2. If you hear the fire alarm:
 - a. Close doors and windows to the room if at all safe to do so.
 - b. Leave the building and go to the assembly point.

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Important:

- a. Do not stop to collect belongings.
- b. Do not re-enter the building until the Fire Brigade have declared it SAFE to do so.

3.9 First Aid

3.9.1 General Statement

The Company is committed to providing sufficient numbers of first aid personnel to deal with accidents and injuries occurring at work. First aid cover will be provided for the whole time that Company workplaces are occupied. The workplace refers to any location where Company work is being carried out.

Should employees have concerns about the provision of first aid within the organisation, they should inform a responsible person to enable the Company to investigate and rectify the situation if necessary.

3.9.2 Arrangements for Securing the Health and Safety of Workers

The Company, in consultation with workers, will:

- Assess the risks involved and the control measures that need to be put into place e.g. provision of Appointed Persons, First Aiders and first aid boxes and equipment as required.
- 2. Implement and monitor the control measures.
- 3. Ensure that emergency procedures are developed and implemented.
- 4. Issue appropriate safety equipment and personal protective equipment to the personnel involved and maintain records of the issue and maintenance of this equipment.
- 5. Ensure that all operatives are properly instructed and trained in the emergency procedures, personal protective equipment and other safety measures, e.g. ensuring that body fluids are cleaned up in the appropriate manner. Records of training will be maintained.

The person responsible for the implementation of this policy is defined in the Organisation and Responsibilities Section.

3.9.3 Safe systems of work

The following arrangements should be followed in order to ensure that suitable and sufficient provision of first aid personnel and equipment is available at the workplace.

- 1. First aid personnel must inform the Company when their training certification period is nearing expiry.
- 2. Management must ensure that employees are familiar with the identity and location of their nearest Appointed Person or first aider and first aid box.
- 3. The names and locations of first aid personnel and equipment must be displayed on the first aid box and on notice boards.
- 4. All personal first aid boxes for travelling must be regularly checked.

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- 5. Ensure that information displayed on office notice boards is updated regularly to reflect any changes in location or changes in appointed personnel which may take place.
- 6. Ensure that the contents of all first aid boxes are regularly checked and that the checks are recorded.
- 7. Summon medical assistance when necessary.
- 8. Ensure that all accidents are reported and entered into the accident book.

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3.10 Provision & Use of Work Equipment

3.10.1 General Statement

The Company is aware of its responsibilities under the Provision and Use of Work Equipment Regulations, 19998 (PUWER). In accordance with its general statement of health and safety policy, the Company will take all reasonable steps to secure the health and safety of employees and others who use work equipment in the workplace. Suitable and sufficient risk assessments will be made to minimise the risk that maybe involved.

Full consultation, in accordance with the existing procedure laid down, will be undertaken with employee representatives in determining the control measures necessary.

Employees will be given adequate information, instruction and, where appropriate, training to ensure a proper understanding of the health and safety issues involved with the operation and use of items of work equipment. The co-operation of all members of management and staff is required to ensure the full implementation of this policy.

Should any employee have concerns about health and safety issues relating to work equipment, these should be reported to their immediate supervisor.

The Provision and Use of Work Equipment Regulations, 1998 (PUWER) apply to all items of "work equipment" provided for "use" or "used", either by employees or the self-employed. Definitions:

- Work Equipment The definition covers all machinery and tools, from a major item of machinery to a screwdriver; and includes equipment such as ladders.
- Use The definition is wide and includes all activities involving work equipment such as starting, stopping cleaning, repair, modification, maintenance and servicing.

3.10.2 Arrangements for Securing the Health and Safety of Workers

The Company will:

- Assess the operation of the machine itself, which will include the assessment of its
 control, the visibility of any operating parts that need to be seen and the accessibility of
 all parts that need to be adjusted.
- 2. Carry out an assessment of how the use of the machine affects its environment, including the layout of the machine and any barriers that are needed to prevent any visitors coming within the danger zone.
- 3. Carry out an assessment of all guards, all isolation procedures of any part of the machinery and all emergency procedures.
- 4. Carry out an assessment of any chemicals involved with the machine and its use, maintenance or cleaning (in compliance with COSHH)
- Take all reasonable steps to minimise all the risks found from these assessments.

The Company will assess the methods of any adjustments or tool changes made on the machine so that tools are fitted and carried safely. All machine guards must be suitable and it must be possible to remove and replace them safely.

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3.10.3 Safe Systems of Work

The Company will ensure that all work equipment, provided for their employees and self-employed persons working for them, complies with the Regulations. The Company will also Ensure that equipment, provided by their employees or the self-employed but used for the Company's work, complies with the Regulations. The Company will select, hire and purchase equipment according to its suitability for the job and for its reliability and tested safety characteristics.

- Equipment will be routinely inspected, maintained and modified under a planned maintenance programme, for which records will be kept. The extent of maintenance required may vary with the intricacy of the equipment but even the most basic of hand tools should be subject to a visual check for defects before use. Complex equipment is likely to require routine maintenance and planned preventive maintenance, which should be carried out in accordance with manufacturer's recommendations.
- 2. The regulations require effective measures to prevent contact with dangerous parts of machinery. As such, the Company will ensure that all machinery is suitable guarded.
- 3. All persons who use machinery and all persons who supervise or manage the use of machinery should have available to them adequate and readily comprehensible safety information and, where appropriate, written instructions pertaining to the use of the machinery. This information should include:
 - a. The methods by which and the conditions in which the machinery may be used;
 - b. Any foreseeable abnormal situations and the actions to be taken when they occur;
 - c. Any conclusions to be drawn from experience of using the machinery.
- 4. All persons who use, supervise or manage work machinery should have received adequate training in its use for the purposes of health and safety.
- 5. Any machinery or equipment at high or low temperature must be suitably guarded.
- 6. The Company will provide personal protective equipment, where necessary.
- All machinery must have suitable controls including the method of starting and
 restarting, the method of normally stopping and the method of emergency stopping.
 These controls should be clearly visible and clearly identifiable. All controls systems
 must be safe.
- 8. Isolation of all equipment or machinery from all sources of energy should be possible. Both the isolation and reconnection procedures must avoid any risks.

3.10.4 Inspections

1. Inspection Requirements

The Company will inspect all work equipment when it has been installed or assembled in a new location to ensure that it has installed correctly and is safe to operate.

The minimum inspection regime will be set by the Company based on manufacturers' information and other statutory obligations. Factors that will be taken into account by the Company include:

- a. The work being carried out;
- b. Site-specific risks that may affect the condition of the equipment;
- c. The intensity of use of the equipment.

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2. Types of Inspection

Equipment that is of low risk and is used for low risk activities will not require a formal inspection, however visual checks may be required by the user before each use to ensure it is in good condition. There is no need to record the results of the visual check but the operative carrying out the check must be competent. In situations where additional hazards exist, low risk equipment may need a more detailed check.

Higher risk equipment and equipment with moving parts, should have a visual check before each use, and may require a more formal check at specified intervals. A competent person should determine the frequency of these formal checks.

Inspection of equipment that poses a significant risk will need to be considered by a person who is competent to determine a suitable inspection regime. These inspections are in addition to the daily checks by the operator and must be carried out by a competent person. For the majority of equipment the formal inspection will be undertaken weekly. Some equipment will require more frequent inspections before each shift.

3. Recording Inspections

The Company will ensure that records of inspections are made and are easily accessible by those who use the equipment or otherwise need the information. The Company will ensure that equipment acquired from another user or provided for use by another user is accompanied by physical evidence of the last inspection.

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3.11 Maintenance Records

The Company will keep comprehensive records of maintenance on equipment, which may be required by statute and associated regulations. To enable them to carry out this responsibility it is essential that the necessary information be passed from persons carrying out the maintenance to the office as soon as possible.

Records will be kept of:

- a. All statutory inspections, e.g. Access Equipment, Electrical Equipment Tests, Motor Vehicles etc.
- b. The issue and maintenance of respiratory protective equipment (where applicable)
- c. Employees training records and medical examination dates (where applicable).

Where any maintenance of Company equipment is delegated to an employee that employee shall be competent to carry out the maintenance and a working procedure shall be produced to ensure the work is carried out correctly.

However, the Company recognises that the responsibility for the maintenance of safety equipment rests with the Managing Director.

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3.12 Hazardous Substances

3.12.1 General Statement

This section dictates the policy for the use of potentially hazardous substances. The nature of the work carried out by the Company means that exposure to hazardous substances is a likely occurrence on a daily basis; therefore strict controls must be in place in order to keep exposure to these substances as low as is reasonably practicable and as far below any Workplace Exposure Limits as is reasonable practicable.

Exposure to substances hazardous to health can occur in a variety of ways, for example:

- 1. From dust and fumes generated when welding, grinding or drilling;
- 2. When mixing and laying concrete (note wet concrete is particularly corrosive);
- 3. When working in or around sewers, manholes and soak ways; and
- 4. Different chemical substances in use on the premises e.g. adhesives, paints.

Preventing exposure to such substances is the aim of this policy. An assessment of the risk will be carried out to identify who is at risk and what control measures will be required to reduce the risk to a level as low as is reasonably practicable.

Hazardous substances include:

- 1. Substances used directly in work activities e.g. adhesives, paints, cleaning agents.
- 2. Substances generated during work activity e.g. fumes from soldering and welding
- 3. Naturally occurring substances e.g. grain dust
- 4. Biological agents such as bacteria and other micro-organisms

Compliance with the Company procedures along with client procedures should ensure exposure to hazardous substances is minimised.

Employees and sub-contractors must also be aware of the requirement not to expose any third party employees or others to substances hazardous to health and must pay due diligence to the Company procedures listed below at all times.

The Control of Substances Hazardous to Health (COSHH) Regulations 2002 (as amended) identify the essential requirements and approach for the control of the hazards and risks likely to be encountered when working with hazardous substances. There are certain substances that are excluded, namely lead, asbestos and ionising radiation, which have their own regulations and codes of practice.

3.12.2 Arrangements for Securing the Health and Safety of Workers

The main duties that become the policy of the Company are:

- 1. To carry out a formal independent assessment of health risks to employees. This assessment has to be reviewed on a regular basis in light of changes to Company procedures, substances or changes to legislative requirements;
- 2. Decide what precautions are needed;
- 3. To prevent exposure of employees to health risks. If prevention is not possible then adequate control measures must be introduced;

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- 4. To ensure that control measures are used, maintained, examined and tested with records of these tests kept.
- 5. To monitor the workplace exposure of employees if necessary;
- 6. To provide, where necessary, health surveillance for employees;
- 7. To prepare plans and procedures to deal with accidents, incidents and emergencies;
- 8. To provide relevant information, instruction, training and supervision regarding the use of hazardous substances and associated control measures.

The Company accept that the above duties also apply to indirect workers and self-employed personnel, with the exception of the following;

- 1. Health surveillance, which applies to employees only; and
- 2. Monitoring, information and training, which applies to employees and others in the workplace.

Employees will be expected to:

- 1. Make full and proper use of all control measures and personal protective equipment introduced by the Company for their protection; and
- 2. Where appropriate, at the cost of the Company, present themselves for health surveillance.

Below are general guidelines for working with hazardous substances. These should be read along with any additional guidelines issued by the Company or information contained in the Company risk assessments.

3.12.3 Safe Use of Hazardous Substances

- 1. Ensure hazard information is kept up to date.
- 2. Ensure assessments are reviewed annually and reassessed every three years or when material changes are made.
- 3. Employees must be trained in the nature of the hazards and use of control measures.
- 4. Controls must be maintained and monitored.
- 5. Ensure all documentation is comprehensive and easy to understand.
- 6. Encourage employees to report faults and problems to their Supervisor.
- Ensure employees follow the guidelines written on the label of the substance and use, transport and store the substance in accordance with manufacturers/suppliers requirements.
- 8. Ensure employees wear the appropriate PPE.
- 9. Chemicals must never be transferred to other containers unless suitably labelled with the full hazard information.
- 10. Ensure two or more substances are not mixed together unless the instructions say it is safe to do so.
- 11. Employees must never eat, drink or smoke in the presence of hazardous substances.
- 12. Employees must always wash their hands before eating, drinking or smoking.

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3.13 Risk Assessments and Method Statements

3.13.1 General Statement

The Company acknowledges its legal duty to carry out risk assessments of all the tasks that it performs. The object of a risk assessment is to identify all the significant hazards present within the workplace and to identify measures to control the risks that employees and others are likely to be exposed to, as a result of these hazards. The purpose of the employer's assessment is to identify any measures necessary to keep employees safe. This duty assessment is to identify any measures necessary to keep employees safe. This duty extends also to temporary workers, sub-contractors, visitors and members of the public.

When an evaluation of the risks has been considered, the principles of prevention (Control measures) should be applied.

Details of the risk assessment process can be found in the Risk Assessment Manual

3.13.2 Arrangements for Securing the Health and Safety of Workers

The Company will:

- 1. Carry out risk assessments for all tasks carried out by the Company
- 2. Implement and monitor the control measures identified in the risk assessments.
- 3. Ensure that the risk assessments are documented.
- 4. Ensure that the risk assessments are linked to the tasks.
- 5. Ensure that safe working practices are developed and implemented.
- 6. Ensure that the risk assessments are made available to the employees involved.
- 7. Ensuring that those involved in risk assessment training are identified and recorded.

3.13.3 Method Statements

When a client requests the production of a method statement, the Directors will ensure that these are produced. Whilst there is no legal requirement for method statements, they are recognised as a useful health and safety management tool for use on different projects. They combine all relevant health and safety information in one document, which reflects the actual working procedure.

It is the policy of the Company that method statements will be produced when requested by clients that they will reflect the working practices. All employees and sub-contractors will be trained in the requirements of the method statement and will be expected to work in accordance with the method statement produced for the contract they are working on.

The person responsible for the implementation of this policy is defined in the Organisation and Responsibilities Section.

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3.14 Personal Protective Equipment (PPE)

3.14.1 General Statement

The Company will provide PPE when the risk presented by a work activity cannot be adequately controlled by other means. All reasonable steps will be taken by the Company to secure the health and safety of employees who work with PPE.

The Company acknowledges that health and safety hazards will have been identified if this equipment is used. It is the intention of the Company to ensure, through the proper use of this equipment, that any risks are reduced to a minimum.

All items of protective clothing or equipment individually issued to members of staff become the personal responsibility of the individual and as such must not be loaned to other work colleagues.

The Company requires that reasonable care be taken with all such items and that they be used and stored in accordance with manufacturer's instructions and with Company policy and procedures. Staff members are required to report immediately any damage or defect, which occurs to any item of PPE.

Individually issued items which have a 'finite life span' or 'Do not use after date' specified by the manufacturer, should be replaced by the Company in accordance with manufacturer's guidelines or specifications.

Whilst it is generally recognised that the use of PPE can be undertaken without undue risks to health, it is appreciated that some employees may have genuine reservations and concerns. The Company will seek to give information and training to enable a better understanding of these issues.

Employees should not wear loose or damaged items of clothing that could become caught up in machinery or other equipment.

Suitable and well-maintained footwear must be worn at all times. Such footwear must provide grip on all surfaces, wet or dry.

Company rules regarding the use of PPE must be adhered to at all times.

3.14.2 Arrangements for Security the Health and Safety of Workers

The Company will, in consultation with workers:

- 1. Carry out an assessment of proposed PPE to determine whether it is suitable.
- 2. Take any necessary measures to remedy a risk found as a result of the assessment.
- 3. Ensure that where two or more items of PPE are used simultaneously that they are compatible.
- 4. Arrange for adequate accommodation for correct storage of the PPE.
- 5. Implement steps for the maintenance, cleaning and repair of the PPE.
- 6. Train staff in the safe use of PPE.

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- 7. Replace PPE as necessary at no cost to the employee.
- 8. Inform employees of the risks.
- 9. Review the arrangements if new or different substances are used or if work processes change.
- 10. Provide sufficient information, instruction and training to ensure the health and safety of workers using PPE, including temporary staff and contractors. Managers and Supervisors who are responsible for users of PPE will also appropriate training.

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3.15 Visitors to Company Premises

Section 3 of the Health and Safety at Work, etc. Act 1974 imposes a duty on every employer to conduct his business in such a way as to ensure, so far as is reasonably practicable, that persons not in his employment are not exposed to risks to their health and safety. This general duty is extended by section 4 of the Act and refers to persons having control of the premises as well as to employers (and indeed the self-employed).

The term 'persons not in his employment' can therefore mean:

- 1. Officials, i.e. Health and Safety Executive Inspectors, Policy, Local Authority personnel or client's representatives.
- 2. Other contractors engaged to carry out work on the Client's premises
- 3. Businesspersons i.e. Sales representatives, buyers and others engaged on official business with the Company.
- 4. Other's, i.e. delivery drivers, general public, etc.

Visitors to Company premises shall, where reasonably practicable, be accompanied at all times. Such visitors shall be made aware of any Company rules appropriate to their undertaking and shall be expected to sign in when arriving and sign out when leaving the premises.

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3.16 Noise Control

3.16.1 General Statement

The Company will take all reasonable steps necessary to ensure that the risk of hearing damage to employees who work with noisy equipment or in a noisy environment is reduced to a minimum. The Company also recognises that noise levels below those that cause hearing damage, in offices for example, can still cause problems such as disturbance, interference with communications and stress and will take all reasonable steps to reduce noise levels as far as possible.

The Company will also take all reasonable steps to minimise the disturbance caused by noise from Company premises affecting people in the neighbourhood and co-operation is required of all members of management and staff.

3.16.2 Arrangements for Securing the Health and Safety of Workers

1. Noise assessments

Where any doubt exists as to whether any machinery or plant owned or used by Company employees has a noise output in excess of 80 dB(A), or a peak output in excess of 135 dB(A), then a noise survey will be carried out by a competent person to ascertain the actual levels.

These will be used as the basis for formulating action plans for remedial measures when necessary. Assessments and surveys will be recorded and updated regularly, particularly when changes in work practice cause changes in noise exposure levels of employees.

2. Reduction of noise exposure levels

Where the personal daily exposure is less than 80 dB(A) and never exceeds the peak action level of 135 dB(A) then no further action will usually be necessary, although it is the policy of the Company to keep all noise to a minimum level consistent with good commercial practice.

Where the personal daily exposure exceeds 80 dB(A) but is less than 85 dB(A) and never exceeds the peak level of 137 dB(A), then all persons affected shall be advised of the survey results, instructed about industrial hearing loss and advised to wear hearing protection. The Company shall supply, maintain and replace such protection free of charge.

Should the survey reveal levels of over 85 dB(A), and/or peak levels of over 137 dB(A), then the Company shall do all that is possible to reduce these levels, so far as is reasonably practicable, by means other than the use of personal protection. The Company accepts that the use of ear protectors is a last resort and is committed to continuing to seek and introduce alternative methods for reducing noise exposure levels whenever possible in the future.

After control measures have been introduced (including ear defenders), noise levels must not exceed the daily personal exposure limit value of 87 dB(A) or the peak limit value of 140 dB(A).

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3. Provision of ear protectors

If the levels cannot be reduced below a personal daily exposure of 85 dB(A) then these areas will be marked as Ear Protection Zones in accordance with BS 5378 and the wearing of hearing protection shall be made mandatory.

The Company will provide suitable and effective ear protection to employees working in high noise levels, as indicated to be necessary by the results of noise exposure assessments. It will also provide for the maintenance and repair or renewal of the protective equipment, and Provide training the selection and fitting of protectors and details of the circumstances in which they should be used.

4. Ear protection zones

If necessary, the Company will designate and mark out ear protection zones, which may include particular areas, operation or pieces of equipment. All personnel entering these zones will be required to wear ear protectors inside the zones.

5. Use and maintenance of noise control equipment and procedures

The Company will maintain all equipment and monitor all procedures introduced to reduce the noise exposure of employees, such as enclosures, silencers, machine covers, etc. All personnel will be required to use these procedures and equipment correctly. They must promptly report any defects or deficiencies through the appropriate channels.

6. Provision of training

The Company will provide adequate training to employees as part of its hearing conservation and noise control policy. Any employees who are subject to high levels of noise will be provided with information, instruction and training about the harmful effects of noise and what they must do in order to protect themselves and meet the requirements of the law and of Company policy. Those responsible for formulating and carrying out Company noise policy will also be given appropriate training.

3.16.3 Safe Systems of Work

Working in high levels of noise without proper protection can cause irreversible damage to hearing. Even at lower levels, noise can cause disturbance and stress. The risk of incurring these harmful and disturbing effects of noise can be minimised by taking the following precautions.

- 1. Avoid making unnecessary noise.
- 2. Co-operate fully when any noise assessments are being carried out so that estimates of noise exposure levels are as accurate as possible.
- Use all equipment and procedures designed to reduce noise exposure levels, e.g. noise
 enclosures, acoustic covers, silencers, etc. Do not interfere with or modify any such
 equipment without authorisation and co-operate to ensure that it is properly
 maintained.
- 4. Always wear the ear protectors provided when required to do so, e.g. in designated and marked Ear Protection Zones. Make sure that the ear protectors are always fitted correctly and are properly looked after.

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- 5. Promptly report all situations that may lead to increases in noise exposure levels, such as defects in equipment or changes in work routine.
- 6. Participate fully in training sessions that detail the procedures to follow to avoid the harmful effects of noise. Inform the employer of any training needs in relation to noise at work.
- 7. Advise management immediately of any problems caused by noise at work.

3.17 Electricity

3.17.1 General Statement

All reasonable steps will be taken to secure the health and safety of employees who use, operate or maintain electrical equipment. The Company acknowledges that work on electrical equipment can be hazardous and it is therefore the Company's intention to reduce the risks as far as is possible.

The implementation of this policy requires the total cooperation of all members of management and staff, as well as any contractors hired to carry out work involving electrical equipment.

Where a problem arises related to electricity at work, employees must inform the Supervisor immediately and the Company will then take the necessary measures to investigate and remedy the situation.

3.17.2 Arrangements for Securing the Health and Safety of Workers

The Company will:

- 1. Ensure that electrical installations and equipment are installed in accordance with the Institute of Electrical Engineers (IEE) Wiring Regulations
- 2. Maintain the fixed installation in a safe condition by carrying out routine safety testing
- 3. Inspect and test portable and transportable equipment as frequently as required (the frequency will depend on the environment in which the equipment is used and the conditions of usage, i.e. how carefully it is handled)
- 4. Promote and implement a safe system of work for maintenance, inspection and testing
- 5. Prohibit live working unless absolutely necessary, in which case a permit to work must be issued before work begins
- 6. Ensure that employees who carry out electrical work are competent to do so
- 7. Exchange safety information with contractors, ensuring that they are fully aware of (and prepared to abide by) the Company's health and safety arrangements
- 8. Provide suitable personal protective equipment and facilities to maintain it in good condition
- 9. Maintain detailed records of inspection, testing and maintenance.

3.17.3 Information and Training

The Company will provide information, instruction and training for all employees to enable them to carry out their duties without putting their health and safety at risk. Competent persons only should carry out electrical work. If it is found necessary to use in-house technical staff to carry out such work, they will be adequately trained to the level required.

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3.17.4 Safe System of Work

Most people are aware of the health and safety hazards associated with electricity. To avoid injury, or worse, it is essential to adopt the following precautions.

Faulty Equipment

- 1. Report faults immediately. Do not use or continue to use faulty equipment.
- 2. Do not carry out repairs, etc, or even fit plugs, unless you are authorised to do so.

Portable and Transportable Electrical Equipment

- 1. The user should visually inspect issued equipment at least once a week.
- 2. Equipment used on the premises should be 110 volt or be supplied via a residual current device (RCD).
- 3. Avoid using long extension leads wherever possible. If their use is unavoidable, ensure that the connector is manufactured to BS EN 60309-2: 199, IEC 60309-2:1999.

Electrical Work - Voltages up to 650

- All work on electrical equipment or systems that involve the exposure of conductors must be carried out with the supply switched off, isolated and secured against reenergisation.
- 2. A proving test to ensure isolation must be completed before starting work and an approved test instrument must be used for this purpose.

Live working

- 1. Live working must be avoided wherever possible. Work on or near live conductors is only permitted when essential for equipment fault diagnosis.
- 2. Only competent persons can be authorised to carry out live working.
- 3. A permit to work is required before working live.
- 4. All practicable precautions must be taken when working live to ensure the safety of persons, including:
 - a. The use of special tools, rubber mats and gloves
 - b. The presence of another authorised person who understands the activity and who is able to handle an emergency (e.g. remove the victim from further danger, administer first aid)
 - c. The erection of safety barriers to keep unauthorised persons out of harm's way.

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3.19 Office Safety

In order to ensure safety, the following conditions will be employed by the Company in addition to the policy on working with DSE:

- 1. All traffic routes, walkways and emergency exit routes must be kept free form obstruction.
- All cables must run along walls and not along floors, thereby reducing the likelihood of a trip hazard. Cable holders should be used to ensure the safe use of computer and printer cables, wherever possible
- 3. Workstations should be organised to provide the maximum freedom of movement for staff. They should be free of clutter. Bags and briefcases should be stored under the desk away from walkways.
- 4. Items should be stored safely on shelves or in filing cabinets and not left in a pile on the desk. Heavier items should be stored on lower shelves, lighter items on higher shelves.
- 5. Oh no account should any employees stand on a chair to reach an item. Kick stools or stepladders should be used.
- 6. Electric kettles, coffee makers and water dispensers should be stored and used away from computers, photocopiers, fax machines etc.
- 7. Guillotines and paper shredders should only be used if the guard is in place.
- 8. Clothing etc. must never obstruct heaters as this presents a fire risk.

3.19.1 Storage

Materials and objects need to be stored and stacked in such a way so that they are not likely to fall and cause injury.

It is the policy of the Company to ensure that;

- 1. All items are stored safely so as not to fall and cause damage to persons, building or equipment.
- 2. Walkways and emergency routes are kept clear of items to ensure safe exit routes in the event of an emergency.
- 3. Storage racking and shelving is of adequate strength and stability for the loads to be placed on them.
- 4. The maximum load of storage areas is never exceeded.
- 5. All storage racking and shelving is regularly checked to ensure that they are not damaged in any way. If damage is noted, that this is recorded and the necessary action taken.
- 6. Employees are encouraged to report any problems, including damage, to the racking so that its safety can be assessed.
- 7. Maximum load notices are fixed to racking and shelving to assist in its safe function.
- 8. Items stores are easily retrievable by employees through safe working procedures and without putting themselves at risk.
- 9. On no account are emergency exit route signs, fire extinguishers, or emergency exit doors to be obstructed by any item.
- 10. All employees expected to use pallet stackers or other pallet trucks, must be given the necessary training in its safe use.

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In addition, the following conditions will be employed as appropriate;

- 1. Where pallets are used for storage, these will be of sound construction and not damaged in any way.
- 2. Banding or wrapping of items to prevent individual items falling.
- 3. Setting limits for the height of stacks to maintain stability.
- 4. Ensuring that stacks do not stand too close to lighting or heating causing a fire risk.
- 5. Regular inspection of stacks to detect and remedy any unsafe stacks.
- 6. Preventing the storage of unopened boxes on top of used or damaged boxes.
- 7. Instruction and training of employees in stacking.
- 8. Special arrangements for objects, which may be difficult to store.

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3.20 Display Screen Equipment

3.20.1 General Statement

All reasonable steps will be taken by the Company to secure the health and safety of employees who work with display screen equipment (DSE).

The Company acknowledges that health and safety hazards may arise from the use of this equipment. It is the intention of the Company to ensure that any risks are reduced to a minimum. Although work with display screen equipment is generally not considered high risk it can lead to muscular and other physical problems, particularly eye fatigue and mental stress. It has been recognised that these can be overcome by the good ergonomic design of equipment, furniture, working environment and the tasks performed.

It is appreciated that some employees may have genuine reservations and concerns. The Company will seek to give information and training to enable a fuller understanding of these issues.

A user is an employee or self-employed person who habitually uses display screen equipment as a significant part of their normal work. In general, a person should be classified as a user if most or all of the following criteria apply:

- 1. The work often requires the continuous use of display screen equipment for periods over one hour.
- 2. The display screen is used, more or less, daily.
- 3. The employee has no discretion as to the use or non-use of display screen equipment.
- 4. The display screen equipment is essential for the job.
- 5. The person using the display screen equipment has been trained and/or has a particular skill to carry out the work.
- 6. Where the fast transfer of information between the user and the screen is an important requirement of the job.
- 7. Where high levels of attention and concentration by the user is essential, e.g. where the consequences of error may be critical.

3.20.2 Arrangements for Securing the Health and Safety of Employees

The Company will, in consultation with employees:

- 1. Carry out an assessment of each workstation, taking into account the DSE, the furniture, the working environment and the employee.
- 2. Take all necessary measures to remedy any risks found as a result of the assessment.
- 3. Take steps to incorporate changes of task within the working day, in order to prevent intensive periods of on-screen activity.
- 4. Review software to ensure suitability for the task.
- 5. Arrange for the provision of eye and eyesight tests at regular intervals or where a visual problem is experienced.
- 6. Arrange for the free supply of any corrective appliances (glasses or contact lenses) where required specifically for working with DSE.

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7. Advise employees and all persons applying for work with DSE, of the risks to health and how these are to be avoided.

3.20.3 Information and Training

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

3.20.4 Eye and Eyesight Tests

Job Changes

Employees who transfer to a job involving the use of DSE will be offered an eye and eyesight test. This entitlement also applies where use of DSE has become a significant part of the work for an employee not previously considered as a regular user.

Regular Eye and Eyesight Tests

Employees are entitled to an eye and eyesight test at intervals recommended by the person who carried out the previous test. All tests are specifically for users of DSE and must be arrange through the Company.

Visual Discomfort

Where an employee experiences visual difficulties and has reason to believe that these may be caused by work with DSE, the Company will offer an eye and eyesight test.

Costs of Testing

The Company will meet the costs of eye and eyesight tests, if testing has been arranged through the Company. Where an employee obtains a test independently and without the knowledge of the Company, even if the test is specifically related to display screen use, the Company shall not be responsible for the costs incurred.

Supply of Glasses

Where glasses are found necessary, specifically for the use of DSE, the Company will contribute towards the purchase. This can be used to obtain a standard frame and lenses, or be put towards a more expensive model. Evidence of intended purchase must be produced.

Care and Replacement of Glasses

The employee is personally responsible for the safekeeping of glasses. It is an offence to interfere with, or misuse, anything provided in the interest of health and safety. Employees are expected to show the same degree of care for glasses as for any other item of Company property. Anybody failing to observe this requirement may e subject to disciplinary procedures. Where there is a change in an employee's visual defect and this result's in a change to prescription requirements, the Company will bear the cost of replacement subject to the procedures outlined above.

3.20.5 Rest Breaks

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The purpose of a break from DSE work is to prevent the onset of fatigue. To achieve this objective, the Company will seek to incorporate changes of activity into the working day. There is no prescribed frequency or duration of breaks from DSE work. Where possible, users will be given the discretion to decide the timing and extent of off-screen tasks.

Any employee who believes that his or her DSE workload does not permit adequate breaks should bring this to the attention of management.

Users of DSE are encouraged, and will be expected, to take the opportunities for breaks.

3.20.6 Radiation and Pregnancy

Employees using DSE are not at risk from radiation. Scientific research has concluded that such concerns are unjustified. No adverse health effects have been found to arise from the use of DSE.

Thus, there is no reason for a person who is pregnant, or is seeking to become pregnant, to avoid working with such equipment. The Company acknowledges that some employees may not be fully convinced by these assurances. It is recognised that, where an employee has a genuine concern, this can contribute to stress and ill health.

The policy is therefore that any pregnant employee may request a temporary transfer or a reduction in the volume of DSE work that she undertakes. Although no guarantee can be given, such requests will receive full and proper consideration and will be granted where this can be achieved without disruption of the Company's operations.

3.20.7 Safe System of Work

Badly adjusted furniture or equipment can result in discomfort and can even lead to disability in extreme circumstances. Poor work design can cause or aggravate these conditions.

Unnecessary discomfort can be avoided by adopting the following simple precautions.

- 1. Make sure that all your furniture and equipment is functioning correctly.
- 2. Adjust furniture and equipment so that you are comfortable when working.
- 3. Take the opportunity to vary activities, breaking up long periods of DSE work.
- 4. Use your entitlement to eye and eyesight tests.
- 5. Report symptoms of discomfort or ill health as soon as you are aware of them.
- 6. Inform your employer of your training needs.
- 7. Do not tamper with electrical equipment but ask for assistance.

3.20.8 Procedures

The following arrangements should be followed in order to ensure that DSE work is effectively managed within your organisation to minimise risks to your employees.

- Records must be maintained in accordance with the requirements of the relevant legislation.
- 2. Workstation assessments must be carried out, results must be recorded and follow-up actions must be taken promptly where necessary.
- 3. Management must encourage and, if necessary, enforce the taking of regular breaks away from the screen, preferably by appropriate design of the job.
- 4. Software must be regularly reviewed to ensure that it is suitable for the task.
- 5. Eye and eyesight tests and corrective appliances must be provided where necessary.

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- 6. Appropriate training and information must be provided, for employees and temporary staff, about the risks associated with DSE work and how to minimise them. This must be done at induction, regularly during employment and at any stage when the nature of an employee's work changes.
- 7. Employees must be encouraged to report any problems with DSE or related furniture as soon as they arise.

3.21 Stress

3.21.1 General Statement

The Company recognises that, whilst a degree of stress can be a positive force at work, excessive pressures can have a negative effect on health and on performance at work. The Company is committed to promoting good health at work; it is therefore concerned to recognise any negative effects that stress may have on individual members of staff, and to provide suitable support mechanisms for members of staff suffering from the negative effects of stress.

Through the risk assessment process, the Company will continue to identify hazards and assess all mental and physical risks to health and safety with the objective of reducing them, as far as is reasonably practicable.

3.21.2 Arrangements for Securing the Health and Safety of Workers.

The Company will, in consultation with workers:

- Ensure, so far as is reasonably practicable, that excessive stress is eliminated from the work environment, and that the necessary risk assessments are completed and acted upon in the case of workplace stressors
- 2. Provide suitable support mechanisms for members of staff suffering from the negative effects of stress
- Encourage a working environment where members of staff who feel they are suffering from the negative effects of stress can approach their managers in confidence, in order that the necessary support mechanisms can be put in place
- 4. Encourage a culture where stress is not seen as a sign of weakness or incompetence
- 5. Ensure adequate rehabilitation of employees returning to work after periods of absence
- 6. Provide suitable training and guidance for line managers to enable them to recognise symptoms of negative stress in their staff and themselves
- 7. Provide suitable training and guidance to line managers to enable them to undertake the necessary risk assessments in relation to stress in the workplace, and to arrange for implementation of effective control measures where appropriate
- 8. Provide information and training for staff in general on the effects of stress at work, effective communication, handling difficult situations, time management and employee relations
- 9. Undertake general health promotion activities within the workplace

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Members of staff will be offered any relevant counselling, help with stress reduction techniques and a full appraisal of their work situation. All referrals will be dealt with in complete confidence.

The person responsible for implementing this policy is defined in the Organisation and Responsibility Section.

3.22 Driving and Mobile Phones

3.22.1 General Statement

Along with the commitment to maintaining a safe working environment, the Company is committed to maintaining the safety of its employees whilst using transport in relation to the Company's undertakings. The Managing Director therefore set down the following code of practice for the safe operation of the vehicles used in conjunction with such undertakings. It **must** be followed by all users at all times. This code of practice doesn't not override the legal requirements that apply to all drivers and the Highway Code must be obeyed at all times. Absolute priority must be given to the safety and well-being of all drivers and passengers in all vehicles owned or hired by the Company.

A list of approved drivers will be maintained by the HR Department

3.22.2 Arrangements and Safe Systems of Work

The Company will:

- 1. Carry out risk assessments for all aspects of occupational driving;
- 2. Implement the control measures identified in the risk assessments;
- 3. Provide any safety equipment identified in the risk assessments along with training in its use:
- 4. Ensure that all drivers are suitable for the work and have adequate driver training and knowledge
- 5. Provide drivers with information regarding safe driving

Drivers

- 1. All drivers will hold a valid licence for the class of vehicle to be driven.
- 2. All drivers will be in good health both physically and mentally, to the best of their knowledge.
- 3. The Managing Director will be informed of any driving conviction or other matter, which might affect a person's entitlement or ability to drive at any time.
- 4. Any driver who is not an employee of the Company will be subject to the same requirements as employees.
- 5. No one will be detailed to drive a vehicle owned or hired by the Company unless the person giving the instruction is fully satisfied that the driver is competent, qualified and physically able to drive the particular vehicle.
- 6. No driver will take charge of a vehicle unless he/she knows that he/she is qualified, competent and physically fit to handle the vehicle.
- 7. No one will be instructed to drive a vehicle against their will.

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8. Adequate time should be allowed for all journeys and rest periods are to be incorporated into planned routes.

Seats, Seatbelts and Equipment

- 1. Passengers will only be seated one to each seat.
- 2. The driver will check that all passengers are seated and wearing belts correctly before each journey.
- 3. Work equipment carried on the vehicle will be secured in such a manner so as not to present a risk to either the occupants of the vehicle, other road users or pedestrians.

Maintenance and Drivers Checks

- 1. All vehicles will be maintained in accordance with the vehicle manufacturers recommendations.
- 2. The vehicle(s) will not be used unless the person in charge has confirmed there are no known safety defects.
- 3. All drivers will make a visual check of the vehicle before starting a journey, and report any defects to supervision.

If in doubt, the vehicle must not be taken out.

Use of Mobile Phones While Driving

Employees driving as part of their work must never make or receive calls on a mobile phone, unless they have a hands free kit fitted to their vehicle.

The Managing Director must:

- 1. Lead by example, both in the way they drive themselves and by not tolerating poor driving practice among colleagues. They must never make or receive a call on a mobile phone while driving. Unless using a hands free system fitted to the vehicle and then all calls should be kept as short as possible.
- 2. Not expect staff to answer calls when they are driving. Unless using a hands free system fitted to the vehicle and then all calls should be kept as short as possible.
- 3. Ensure that employees understand their responsibilities not to use a hand held mobile phone while driving. Unless using a hands free system fitted to the vehicle and then all calls should be kept as short as possible.
- 4. Ensure that employees plan journeys to include rest stops which also provide opportunities to check messages and return calls. Unless using a hands free system fitted to the vehicle and then all calls should be kept as short as possible.
- 5. Ensure that work practices do not pressurise staff to use a mobile phone while driving. Unless using a hands free system fitted to the vehicle and then all calls should be kept as short as possible.
- 6. Ensure compliance with the mobile phone policy is included in team meetings and appraisals and periodic checks are conducted to ensure that the policy is being followed. Unless using a hands free system fitted to the vehicle and then all calls should be kept as short as possible.
- 7. Ensure that they challenge unsafe attitudes and behaviours, encourage employees to drive safely and lead by personal example by never themselves using a phone when

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driving. Unless using a hands free system fitted to the vehicle and then all calls should be kept as short as possible.

Employees who drive for work must:

- 1. They must never make or receive a call on a mobile phone while driving, unless using a hands free system fitted to the vehicle and then all calls should be kept as short as possible.
- 2. Plan journeys so they include rest stops when messages can be checked and calls returned
- 3. Ensure their phone is switched off and can take messages while they are driving, or allow a passenger to use the phone. Unless using a hands free system fitted to the vehicle and then all calls should be kept as short as possible.
- 4. Co-operate with monitoring, reporting and investigation procedures.

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Vibration

3.21.1 General Statement

The Company will take all reasonable steps necessary to ensure that the risk of illness to employees who work with vibrating hand held equipment or equipment that causes whole body vibration is reduced to a minimum.

The Company recognises that vibrating hand tools can cause a range of conditions that are collectively known as Hand-Arm Vibration Syndrome as well as diseases such as Carpal Tunnel Syndrome. The symptoms of these diseases include:

- Tingling and numbness in the fingers
- Inability to feel things properly
- Loss of strength in the hands
- The fingers going white (blanching) and becoming red and painful on the return of circulation (Vibration White Finger).

Vibrating machinery that causes Whole Body Vibration, can give rise to back pain and neck pain, buffer machines are an example of this in the cleaning industry. If staff use the buffering machines for long periods of time then their exposure to the vibration will be more so. manufacturer guidelines should be followed at all times.

These symptoms may appear after a few months or may take several years. Repeated exposure may make the symptoms permanent. These symptoms can reduce an employee's ability to work and could seriously affect the person's family and social life.

3.23.2 Arrangements for Securing the Health and Safety of Workers

The Company will, in consultation with workers:

- 1. Assess the risk of vibration to their employees
- 2. Decide if employees are exposed to more than the daily (A8) Exposure Action Value (2.5ms²) and, if they are:
 - a. Introduce a programme of controls to eliminate the risk or to reduce exposure to as low a level as is reasonably practical. For example, job rotation, purchasing low vibration equipment, using jigs to operate equipment remotely etc.
 - b. Provide health surveillance for those employees who are still regularly exposed to levels above the action level
- 3. Decide if employees are likely to be exposed above the daily (A8) Exposure Limit Value (5ms²) and take immediate action to reduce exposure if they are.
- 4. Provide information and training, to employees, on the health risks of and actions to control the risk.
- 5. Keep a record of risk assessments and control measures.
- 6. Keep records for any employees undergoing health surveillance.
- 7. Review and update risk assessments regularly.

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3.23.3 Safe Systems of Work

Working with high levels of vibration can cause irreversible damage to joints, nerves and blood vessels. However, the risk of incurring these harmful effects can be minimised by taking the following precautions.

- 1. Co-operate fully when any vibration assessments are being carried out so that estimates of vibration exposure levels are as accurate as possible.
- 2. Correctly use all equipment and procedures designed to reduce vibration exposure levels, e.g. job rotation, remote jigs, damping equipment etc. Do not interfere with or modify any such equipment without authorisation and co-operate to ensure that it is properly maintained.
- 3. Do not use vibrating equipment for longer than the specified time (trigger time or other calculated exposure time).
- 4. Always wear the personal protective equipment provided when required to do so e.g. warm leather gloves and warm clothing to maintain a good blood flow.
- 5. Ensure all equipment is maintained and used in line with manufacture's instructions and that all cutting edges are sharp.
- 6. Promptly report all situations that may lead to increases in vibration exposure levels, such as defects in equipment or changes in work routine.
- 7. Participate fully in training sessions that detail the procedures to follow to avoid the harmful effects of vibration. Inform the employer of any training needs in relation to vibration at work.
- 8. Advise management immediately of any problems caused by vibration at work.

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3.24 Manual Handling

3.24.1 General Statement

Statistics show that manual handling is one of the most common causes of absence through injury at the workplace. More than one third of lost time accidents are caused in this way. These injuries may often have long-term effects. This policy is intended to reduce the risk of manual handling injuries and to provide guidance on the measures that should be taken to ensure safe lifting and carrying at the workplace. The person with the responsibility for implementing the provisions of this policy is the Managing Director.

3.24.2 Arrangements for Securing the Health and Safety of Workers

1. Eliminate of Hazardous Manual Handling Activities

The Company will ensure that operations, which involve manual handling, are eliminated, so far as is reasonably practicable. Measures to achieve this include ergonomic design of the workplace and activity and the provision of automated or mechanical aids.

2. Assessment of Risk

The Management of Health & Safety at Work Regulations 1999 requires employers to make a suitable and sufficient assessment of the risks to the health and safety of their employees whilst at work. Where this assessment indicates that employees are at risk from the manual handling of loads, the Manual Handling Operations Regulations 1992 will apply. Under these Regulations, a clear series of measures has been established:

- a) To avoid hazardous manual handling operations where possible,
- b) To assess any hazardous operations that cannot be avoided,
- c) To use the results of the assessment as a basis for action by removing or reducing the risk of injury.

The Managing Director is responsible for ensuring that all grades of staff who are required to manually handle loads as part of their employment are assessed and, where manual handling operations cannot be avoid and there is a risk to staff, trained in lifting techniques. Staff must attend training courses when requested to do so by their employers.

All assessments that are carried out will be in writing, and guidance on the production of these assessments is given in the following 'Flow Chart'. Assessments may be generic to cover much of the routine handling of loads. In this way, once basis principles are set out detailed assessments of each load will not be necessary but only for those that are out of the ordinary.

The Managing Director must assess the work activities for all-new staff and reassigned staff at the start of their employment.

Assessments must take in account the factors involved, i.e., the tasks, the load, the individual's capacity and the working environment as well as measures devised to minimize the risk of injury.

3. The Task

Bending and stooping to lift a load significantly increases the risk of back injury. Items should ideally be lifted from no lower than knee height to no higher than shoulder height. Outside this range, lifting capacity is reduced and the risk if injury is increased. Where items are required to be lifted from above shoulder height, a stand or suitable means of access should be used. Items,

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which are pushed or pulled, should be as near to waist level as possible. Pushing is preferable particularly where the back can rest against a fixed object to give leverage.

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

4. The Load

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

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

5. The Individual

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

Persons with genuine physical or clinical reasons for avoiding lifting should not be made to lift items. This also applies to pregnant women, who should not be required to undertake hazardous lifting or carrying tasks.

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

6. The Working Environment

There must be adequate space to enable the activity to be conducted in safety and the transportation route must be free from obstruction. Lighting, heating and weather conditions must be taken into account. Floors and other working surfaces must be in a safe condition, and adequate ventilation is required, particularly where there is no natural ventilation.

7. Other Factors

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

3.24.3 Duties of the Managers and Supervisors

Managers and Supervisors must ensure that:

- Manual handling assessments are carried out where relevant and records are kept.
- 2. Employees are properly supervised
- 3. Adequate information and training is provided to persons carrying out manual handling activities.

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- 4. Any injuries or incidents relating to manual handling are investigated, with remedial action taken
- 5. Employees adhere to safe systems of work
- 6. Safety arrangements for manual handling operations are regularly monitored and reviewed
- 7. Employees undertaking manual handling activities are suitably screened for reasons of health and safety, before undertaking the work
- 8. Special arrangements are made, where necessary, for individuals with health conditions, which could be adversely affected by manual handling operations.

3.24.4 Duties of Employees

Employees must ensure that:

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

3.24.5 Safe System of Work

Poor lifting and carrying techniques can result in discomfort and increase the risk of injury. In extreme circumstances, these injuries can have permanent effects. Adopting the following simple precautions can reduce these risks.

- 1. Ensure that formalised systems of work, which have been designed for the work activity, are complied with.
- 2. Make full and proper use of aids to lifting and carrying, such as trolleys, chutes and access equipment.
- 3. Store heavy items between shoulder and hip height. Where possible only store small, light items above shoulder or below knee height.
- 4. Use the legs and knees to bend and lift do not stoop or bend the back
- 5. Avoid tasks, which require stretching, or twisting.
- 6. Ensure that regular rest breaks are taken where manual handling activities are repetitive or to prevent the onset of fatigue.
- 7. Ensure that there are no sharp, hot or cold edges, which could cause injury.
- 8. Ensure that walkways are free from obstructions.
- 9. Make full and proper use of personal protective equipment.
- 10. Report any problems or concerns associated with manual handling operations to a responsible person immediately.

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3.25 Work Related Upper Limb Disorders (WRULD)

3.25.1 General Statement

The Company is aware that some repetitive activities or combination of activities can result in the condition referred to as WRULD or Repetitive Strain Injury (RSI). This commitment extends to taking all reasonable precautions necessary to secure the health and safety of employees through the application engineering and sound ergonomic principles. Due to the nature of WRULD, it is a clear responsibility of all employees to consult and inform management of perceived risks and of any symptoms.

3.25.2 Arrangement for Securing the Health and Safety of Employees

- 1. Risk assessment of all activities to identify risks, which could lead to WRULD. Repetitive and non-repetitive jobs will be identified and classified.
- 2. Evaluation of the possible methods of hazard elimination, e.g. does the job have to be done this way, can it be improved by engineering, equipment or design methods, etc.
- 3. Through the risk assessment process to identify, reduce and control situations and activities which create health risks due to:
 - a. Extreme joint movement.
 - b. Excessive force levels
 - c. Highly repetitive and stereotyped movements.
 - d. Poor design of tools, workstations and equipment.
 - e. Lack of job rotation and job variation which results inadequate recovery periods.
- 4. The overall objective is to adopt basic design and engineering principles with the objective of fitting the task to the individual, as far as reasonably practicable.
- 5. To establish capacity needs for tasks.
- 6. To implement self and management referral systems for employees who may experience symptoms.
- 7. To ensure all applicants are made aware of the job requirements and of their responsibilities to report symptoms, e.g. to warn and educate applicants before they start a job known to involve high-risk activities.
- 8. To provide adequate training from day one.
- 9. To provide competent, informed and adequate supervision.

3.25.3 Safe System of Work

To ensure a safe system of work the following measures should be adopted.

- A risk assessment should be undertaken looking at the design of the workplace and the work activities carried out so that risks are reduced to the lowest extent reasonably practicable.
- 2. Training should be given in the use of equipment and a desired working method demonstrated.
- 3. Employers should ensure that applicants are informed of the job requirements before commencing employment in a job known to involve high-risk activities.
- 4. Employees should be made aware of their responsibility to report symptoms of WRULD.
- 5. Users of DSE should be made aware of their right to request eye examinations carried out by a competent person.
- 6. Employers should provide competent, informed and adequate supervision.

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Safety Signs & Signals 3.25.4 General Statement

The Company is aware that it must provide and maintain safety signs where risks cannot be adequately controlled using other health and safety measures alone. The Company has carried out risk assessments, as required by the Management of Health and Safety at Work Regulations 1999 and these identify where safety signs and signals are required.

The Company will provide and maintain the safety signs identified by the risk assessments. The Company will also provide and maintain the safety signs required by fire safety legislation.

The Company will ensure that the safety signs provided comply with the requirements of the Health and Safety (Safety Signs and Signals) Regulations 1996.

The implementation of this policy requires the total co-operation of all members of management and staff. There will be full consultation with employee representatives through existing channels of communication.

3.25.5 Arrangement for Security the Health and Safety of Workers

The Company will:

- 1. Identify where safety signs are needed.
 - 2. Provide safety signs that comply with the specifications laid down by the Health and Safety (Safety Signs and Signals) Regulations 1996.
 - 3. Clean signboards as frequently as necessary to ensure they remain visible and check they remain securely fastened.
 - 4. Test and maintain illuminated signs and acoustic signals.
 - 5. Train employees in the meaning of safety signs.
 - 6. Ensure that employees who use verbal communication or hand signals are competent in their use, including training them on the code used by the Company.

3.25.6 Information and Training

The Company will provide sufficient information, instruction and training to all employees on the meaning of safety signs and what could happen if they are ignored. Managers and supervisors will also be given appropriate training.

3.25.7 Safe System of Work

Safety signs are provided to give you information and warning sin relation to your health and safety. It is important that you follow these procedures to reduce the likelihood of having an accident or becoming ill because of work:

- 1. When you enter an unfamiliar work area, always take a look round for safety signs;
- 2. Always follow the instructions given by safety signs; failure tod o so could result in injury or ill health;
- 3. If you notice a problem with a safety sign, e.g. it is missing, difficult to see or needs a new bulb, inform your manager or the maintenance manager as soon as possible;
- 4. If there are areas that you feel require a safety sign, discuss this with you Manager or Supervisor;

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5. Before using hand signals or verbal communication, be sure that both the person giving the signals and the person receiving the signals know and understand the code to be used.

3.26 Young Persons3.27.1 General Statement

The Company is aware of the additional risks that may follow as a consequence of the employment of young persons and will take all measures necessary to minimise those risks so far as is reasonably practicable. The Company will assess and document the additional risks and measures provided to ensure the health and safety of young persons.

The Company is aware of the statutory restrictions imposed upon work undertaken by young persons and will comply with these restrictions. Young persons will be given the raised level of information, instruction; training and supervision required to enable them to work safely.

Employees' concerns regarding young persons in the workplace should be addressed to the Supervisor and measures will then be taken to investigate the circumstances and provide a solution.

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3.27.2 Arrangements for Ensuring the Health and Safety of Workers

All reasonable steps will be taken by the Company to secure the health and safety of young persons. Young persons may be school children placed with the Company on work experience programmes or apprentices employed by the Company. These arrangements will also apply to other young persons under 18 and to inexperienced workers in general.

There will be thorough preparation before young or inexperienced workers arrive, enabling a risk assessment to be undertaken of any hazards to which they may be exposed.

On arrival at the employer's premises a thorough induction will be undertaken, not only to provide an introduction to work but to explain any health and safety rules, regulations and precautions that must be taken.

The Company will ensure that:

- 1. Young persons are fully briefed.
- 2. Employees at all levels know exactly what their responsibilities are and have clear details as to the extent of the work, which may be undertaken.

The Company will identify the activities in which young persons are to be engaged, ensure that all risks are controlled and a safe system of work implemented.

The Company will also determine whether it will be necessary to impose any limitations or special arrangements on medical grounds (e.g., where a young person suffers from asthma, defective colour vision or hearing impairment, etc).

3.27.3 Training and Supervision

The Company recognises that training, coupled with proper supervision, is particularly important for young persons because of their relative immaturity and unfamiliarity with the working environment.

The Company will ensure that an assessment is made of the individual's ability and knowledge prior to training in order that training is provided to bring that individual up to an appropriate and acceptable level of suitable competence.

3.27.4 Safe System of Work

In addition to the specific training, they will need to carry out their assigned work tasks, young persons need to be aware of the following general rules for safeguarding their safety and the safety of others.

- 1. Games and practical jokes are not appropriate in the workplace. Potentially serious injuries could result from such conduct.
- 2. Work areas and gangways need to be kept tidy. Do not leave things lying where people could trip or bump into them.
- 3. Good hygiene and the use of barrier creams where appropriate, are needed to prevent risks to health and safety from dangerous articles and substances in the workplace.
- 4. If protective equipment and clothing is issued, this needs to be used and kept in a good condition.

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- 5. Running in the workplace can be dangerous and should therefore be prohibited. Safe routes must always be used.
- 6. Lifting and carrying should be carried out in the correct manner, Supervisors should arrange instruction and training and monitor that the necessary techniques are used.
- 7. Compressed air is used for approved purposes only. It should not be used for cleaning benches or clothing.
- 8. Electricity is very dangerous and electrical equipment should only be used according to instructions.
- 9. Machines must not be used unless training has been given, including the uses of safety guards, etc.
- 10. Hazard warning signs for harmful substances need to be recognised and the instructions of the supervisor followed.
- 11. Care must be taken when handling flammable substances and smoking prohibitions must be observed. Carelessly discarding rubbish or smoking materials presents a fire hazards.
- 12. Any injury must be reported to supervision.
- 13. Be fully aware of emergency and first aid arrangements and actions.

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3.28 Working at Height

3.28.1 General Statement

When employees are expected to work above the ground and away from solid platforms, then access equipment may be appropriate. Due to the nature of the work carried out by the Company, working at heights is generally not required. Window cleaning is by way of extending pole washing systems wherever possible. Should work at height be required then it is the policy of the Company that strict procedures must be in place.

All reasonable steps shall be taken by the Company to provide a safe working environment for employees required to carry out their trade or professional skills at height.

The Company shall provide the necessary preventive and protective measures to prevent falls of persons or materials from the workplace and will liaise with any other persons involved in the work activity.

The employee and any other person involved in the work activity shall cooperate in the implementation of this policy

3.28.2 Arrangements for Security the Health and Safety of Workers

The Company will, in consultation with workers;

- 1. Carry out an assessment of the risks involved in work at height and take steps to eliminate or control them.
- 2. Provide all the necessary equipment to allow safe access to and egress from the place of work.
- 3. Provide suitable plant to enable the materials used m the course of the work to be safely lifted to, and stored if necessary at, the workplace.
- 4. When working in an open environment, assess the effect of weather conditions on the type of work being undertaken and, if necessary, halt work temporarily (once the work, plant and equipment have been left in a safe condition) until such time as it is safe to continue.
- 5. When working at dusk, night or dawn, provide sufficient local lighting, so that work can be carried out safely and access and egress are easily visible.
- 6. Arrange for the regular inspection of all equipment required for working at height, particularly where there is a statutory requirement to do so.
- 7. Appoint a competent person to be responsible for the supervision of the erection, altering and dismantling of scaffolding and for the inspection of equipment used in work at height.

3.28.3 Information and Training

The Company provides all the information, instruction and training that an employee requires to carry out his or her trade or skill in a safe manner when working at height.

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3.28.4 Safe System of Work

In order to prevent falls of person or objects from a height, the following measures should be taken.

- 1. Plan work in advance to anticipate potential problems and implement safe procedures.
- 2. Draw up rescue plans as required
- 3. If at all possible, arrange for work to be done at ground level or provide adequate platforms where it is not possible to work from the ground.
- 4. Ensure that the surfaces of working platforms are free of protrusions and obstructions and that they are large and strong enough to hold workers along with their tools and materials.
- 5. Make use of safety harnesses where these are required.
- 6. Follow the method statement laid down by the Company; if this is not possible, inform a responsible person immediately.
- 7. A competent person must inspect all equipment before use.
- 8. Report any defects found to a responsible person immediately.

3.28.5 Mobile Access Equipment

Where it is not possible to work from the existing structure other access equipment will be employed, for example mobile elevating work platforms.

It is the policy of the Company that mobile access equipment will only used by trained and competent employees.

Prior to using the platform, always refer to the manufacturer's operating and safety instructions. A safety harness and lanyard must be worn at all times.

Care must be taken to ensure that the platform is position correctly and that all outriggers and stabilisers are fully engaged. Warning signs and traffic cones must be placed on the traffic side of the vehicle to reduce the possibility of accidental collision with passing vehicles. The knuckle of the boom must not extend outside of the safety zone formed by the cones and the safe working load must not be exceeded. Operatives must not travel with the platform in the elevated position unless it is specifically designed for that purpose.

3.28.6 Ladders

Ladders are best used as a means of gaining access to a workplace. They should only be used as a workplace themselves for short-term (15-30 minutes), lightweight work (e.g. cleaning a small window). Three points of contact must be available at all times. Podium steps with a guardrail (or similar equipment) should be used in preference to stepladders. Mobile elevating work platforms or scaffold towers should be used in preference to extending ladders.

If ladders are to be used, all employees must make sure that:

- 1. The work can be reached without stretching;
- 2. The ladder can be fixed to prevent slipping;
- 3. A good handhold is available;
- 4. The ladder is suitable for the job being carried out.

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Check that all ladders have clearly marked identification details and numbers. Do not use parts from different ladders. Ladders should be inspected for damage at regular intervals of not more than six months. Details of the inspections should be retained for record purposes. Points to look for and the recommended methods of inspection are as follows:

3.28.7 Protective and Appropriate Clothing

Operatives should always wear suitable clothing to provide comfort and protection from the elements. This is particularly important in the winter, when the cold can cause fatigue especially in exposed locations.

Operatives should not wear loose or damaged items of clothing that could become caught up in ladders or other equipment. If it is a site rule or there is the risk of objects falling from above, safety helmets must be worn at all times. Suitable and well-maintained safety footwear must be worn at all times. Such footwear must provide grip on all surfaces, wet or dry.

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Use of Suspended Equipment

3.28.8 General Statement

This section deals with the use of suspended cradles, rigs, winches and trolley systems. It gives both general guidance in their use, as well as specific safety instructions in the operation of certain types of equipment.

Operatives must not attempt to use any suspended equipment unless they have been trained to so or they are receiving training and are working under the supervision of a fully qualified and competent operator.

3.28.9 General Safety Points- All Suspended Equipment

Anchorage and Supports

- 1. It is essential that outriggers have a firm and secure anchorage.
- 2. Outriggers must be of sufficient strength and spaced in accordance with the manufacturers erection instructions.
- 3. Outriggers must be kept as horizontal as possible and must be properly supported. If necessary, use packing materials to prevent damage.
- 4. Outriggers must be firmly held down at the tail or inner end using the fixing method provided or, where counter weights are used, there must be a high factor of safety against overturning.
- 5. Outriggers must not be rested on any structure that is showing any signs of deterioration.
- 6. When traversing rail tracks are used, these must be securely fixed to the outriggers, they must be correctly aligned and have the end stops correctly fitted to prevent derailment.
- 7. When using jib arms and traversing rails, do not over tighten the roof fixing by hitting with a hammer, particularly if it is of the bronze bolt and wing nut type.
- 8. Only use the correct length-traversing rail, if one is used that is too long the cradle centre line could pass outside the line of either jib arm. The assembly is then liable to pivot dangerously if this occurs.

Rigging

- 1. Check that all fitments on the cradle are tight and in good working order, and ensure that they are all present before removing the equipment from the stores.
- 2. All cradles must be fitted with toe boards.
- 3. Never leave a suspended cradle unattended, always securely tie it to the building.
- 4. Cradles should always be slung as close as possible to the building face.
- 5. On high buildings, prevent the cradle from swaying by the use of guy ropes fixed to the ground or building.
- 6. Check that the guardrail is in position and securely fixed, operatives must never stand on a guardrail to gain extra reach.
- 7. All fall ropes must be correctly tied off.
- 8. Counter balance weights must not be dropped onto the roof surface or on to any ropes. To prevent damage they should be placed on a board.

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- 9. The roof area must be kept tidy at all times to prevent the weights or ropes becoming tripping hazards.
- 10. The ground area below the cradle in which you are working should be cordoned off with the appropriate warning signs for the protection of others.

Operatives must not over reach and must always wear their safety harness when working from a cradle.

Push Trolley Rig

- 1. Manufacturers or special instructions must be adhered to at all times; operatives must sign and date any inspection form accompanying the equipment
- 2. It must be ensured that the correct counter balance weight is in place.
- 3. During the rigging process, operatives must attach their safety lanyard to the trolley.
- 4. Before entering the cradle, operatives must attach their safety lanyard to the cradle suspension and must remain attached as such whilst working in the rig.
- 5. The second operative pushing the trolley must have his safety lanyard attached to the trolley at all times.

Hook Ladder Rig

- 1. Manufacturers or special instructions must be adhered to at all times; operatives must sign and date any inspection form accompanying the equipment.
- 2. It must be ensured that the correct counter balance weight is in place.
- 3. Attach a personal safety rope using a short line to "Everest" safety device.

Mechanical Winches

- 1. Manufacturers or special instructions must be adhered to at all times; operatives must sign and date any inspection form accompanying the equipment.
- 2. Operatives should check that all safety systems (e.g. stop blocks and safety locks) are correctly fitted and operational.
- 3. Ensure that the cables or ropes lay evenly on the winding drum when in use, this is vitally important for smooth and safe operation.
- 4. With electrical winches, operatives must check that they are familiar with the procedure for manual operation in the event of power failure when working at the building face.

Winding Type Winches

Always ensure that the wire is wound onto the drum. One operative must hold the cable taut whilst a second operative winds the drum. Failure to do this will result in the cable not lying evenly and it is not possible to wind all the cable onto the drum. Failure to do this will result in the cable not lying evenly and it is not possible to wind all the cable onto the drum. Additionally the cradle may operate in a jerky manner next time it is used.

Tirfor Winches (Pumping Type)

These must not be used unless they have been fitted with "Stop Blocks" or "Everest" safety locks devices.

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The winch must be lubricated with oil before use and then daily prior to commencing work. This helps the internal jaws to grip the cable tighter and therefore makes operator use easier.

Cradles and Chair

- 1. Always attach your safety line to the eyebolt on the trolley system before entering the cradle and transfer to the cradle stirrup once safety inside.
- 2. Never remove the rope completely from the hook but feed it through the hitch.
- 3. Boatswain's chairs are to be secured to the pulley blocks, as are all blocks suspended from trolleys or roof rigs.
- 4. Some joist rollers have a pulley wheel incorporated into the joist roller. The cradle fall rope should be passed over the pulley in the normal way and secured to the Becket.
- 5. Never hook a single block to the Becket of a joist roller if a pulley wheel is fitted.
- 6. When rigging ropes to the blocks use a slightly different section of the rope each time to ensure even wear. Reverse the rope occasionally.
- 7. Care must be taken with any roof rigging not erected by Company personnel. Before use, it should be inspected by a competent operative.

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3.30 Pole Window Cleaning Equipment

3.30.1 General Statement

The Company recognises that in many situations especially in the case of window cleaning, using extending pole systems can help avoid the risks of working at height.

It is Company policy that pole systems will be used wherever possible to avoid the risks of working at height.

3.30.2 Arrangements for Securing the Health and Safety of Workers

In consultation with workers the Company will:

- Carry out risk assessments to determine the most appropriate system for cleaning windows at each site;
- 2. Assess the pole system to ensure that all control measures have been identified;
- 3. Implement the control measures identified;
- 4. Supply all the pole equipment and safety equipment required;
- 5. Train staff in the safe use of the pole system and provide information and supervision as required.

3.30.3 Safe Systems of Work

It is important to remember that this equipment cannot be used in every situation and the following will need to be considered:

- 1. Ensure that risk assessments have been carried out for the site;
- 2. Cordon off the area to avoid the risk of injury to others from falling poles or slip hazards, for example.
- 3. Check the work area to ensure that there are no overhead power lines;
- 4. Wear appropriate safety footwear to reduce the risk of slipping. Large quantities of water on the ground can increase the risk of slipping to the worker and others in the area. The pole system may not be suitable in icy weather conditions (Risk assessment).
- 5. Frequent rest breaks should be taken, while using the poles as their use can affect posture and lead to musculoskeletal injuries.
- 6. The manufacturer's instructions must be followed at all times when using water-fed poles or other similar types of water systems.
- 7. Safety notices must be placed around the surrounding area to notify others of the work.

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3.31 Environmental Policy

The Company recognises the responsibilities placed on them by the Environmental Protection Act 1990 and as such are committed to operating in such a way that work activities do not have a negative effect on the environment.

Wherever possible in purchasing its materials, equipment and consumable items the Company will give preference to purchasing items that do least environment harm. This means items should:

- Not be supplied with excessive packaging;
- Have low energy consumption;
- Be re-usable or at least recyclable;
- Have low (or zero) solvent use in manufacture;
- Have low (or zero) solvent emission in use;
- Be carbon neutral.

The Company will be proactive in environmental control and to self-regulation rather than being reactive after the event.

The Company will seek to minimise the generation of waste, taking into account the nature of work, through the reduction, reuse, or recycling of materials, equipment and consumables. Working to current legislation and regulatory standards are deemed the minimum requirements but the objective of the Company is to surpass this minimum standard.

The philosophy is accepted and implemented from the Managing Director and throughout the workforce

To this effect the Managing Director is responsible for monitoring the effectiveness of this policy.

3.31.1 Waste Disposal

It is the policy of the Company to ensure that all waste produced is disposed of in accordance with the requirements of the Environmental Protection Act 1990 and the Regulations made under this Act.

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3.32 Alcohol and Drugs Policy

The abuse of alcohol and non-prescribed drugs will not be tolerated on the premises of the Company or elsewhere whilst on Company business.

It is impossible to work safely whilst under the influence of alcohol or drugs and accordingly they must be prohibited

Anyone found to be under the influence or in possession of either, will be sent home, and become subject to the Company's disciplinary procedures later.

Should anyone suspect a colleague of being under the influence of alcohol or drugs it is imperative that he/she advise their supervisor for the safety of all concerned?

Drugs prescribed by your doctor or pharmacist may also affect your performance and as such your Supervisor must be informed.

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3.33 Equal Opportunities Policy

The Company is committed to complying with the Sex Discrimination Act 1975, the Equal Pay Act 1970 (as amended) 2003, the Race Relations Act 1976 (as amendment) 2000, and the Disability Discrimination Act 1995.

The Company will ensure that qualifications, skills and previous experience are requested only when it is necessary to do the job.

Each applicant will be assessed on merit only and not on their ethnic origins or gender. Selection of staff whether on contract or as full/part-time employees will be based on the above criteria.

The Company will examine from time to time all its work places to assess if they can be improved to accommodate female or disabled employees.

Managers/Supervisors are encouraged to take action in eliminating any sexual or racial harassment at work. This can include both physical and verbal abuse and persistent unwanted advances. Disciplinary action may be taken against anyone contravening this policy.

Employees can report direct to the Managing Director, any complaints or grievances under this heading.

All employees have the right to discuss their own personal record file. Recruitment, training and promotion will be monitored on a regular basis.

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3.34 Smoking Policy

It is Company policy that all its workplaces are smoke free as all employees have a right to work in a smoke free environment. In line with current legislation, smoking is prohibited in all enclosed and substantially enclosed premises in the workplace, including all Company vehicles. All staff must support the implementation of this policy. Disciplinary procedures will be followed for any employee who does not abide by this policy. Any employee who smokes and would like to give up smoking will be encouraged to do so, the NHS offers various free support services including the telephone helpline 0800 169 0 169 which provides information on the best ways to help give up smoking.

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3.35 Lone Working

3.35.1 General Policy

The Company will ensure, so far as is reasonably practicable, that employees and self-employed contractors who are required to work alone or unsupervised for significant periods of time are protected from risks to their health and safety. Measures will also be adopted to protect anyone else affected by solitary working.

Solitary working exposes employees and others to certain hazards. The employer's intention is either to entirely remove the risks from these hazards or, where complete elimination is not possible, to reduce them to an acceptable level.

3.35.2 Arrangements for Securing the Health and Safety of Workers

- Assessments of the risks of working alone will confirm whether one unaccompanied person can actually do the work safely. This will include the identification of hazards with particular action given to:
 - a. The remoteness or isolation of workplaces
 - b. Any problems of communication
 - c. The possibility of interference, such as violence or criminal activity from other persons
 - d. The nature of injury or damage to health and anticipated "worst case" scenario.
- Control measures identified in the risk assessments will be implemented and maintained.
- 3. Job and person specifications will be drawn up to identify the abilities required in an employee who is required to work along.
- 4. Specifications will be drawn up to cover the minimum requirements of any equipment supplied to lone workers.
- 5. A suitable system of supervising and monitoring lone workers will be implemented which will be proportional to the risks identified.
- 6. Employees and others will be given all necessary information, instruction, training and supervision to enable them to recognise the hazards and appreciate the risks involved with working alone.

3.35.3 Safe System of Work

Employees will be required to follow the safe working procedures, which will include the provision of first aid, communication procedures and awareness of emergency procedures. All employees are required to cooperate with these efforts to ensure safe working and to report any concerns to management.

Further details of the Company's safe working procedures can be found in the Lone Working Procedures document published by Human Resources.

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Lone Workers Policy

As a responsible employer Securteam Limited are concerned about the health, safety and welfare of all employees including those who work alone in empty or sparsely staffed buildings. The following notes of guidance should be read carefully and seen as a means of reinforcing your own natural vigilance for avoiding situations that may case you harm.

1. Driving to site

Ensure another responsible person knows where you are going, when you anticipate arriving, when you plan to leave and what time you hope to be home.

- Lock car whilst driving.
- Do not leave a bag or portable telephone in view.
- Being followed? Uneasy? Uncertain? Remain with or return to your vehicle, drive away for a short while, drive to a place of safety, perhaps a police station, fire station or bus depot; if your suspicions are confirmed, contact the police.
- Do not allow unofficial access to your car (or unwanted passengers) by leaving the car unlocked when you pay for petrol at a garage. Try to choose a pump nearest the shop/pay office and lock the car when you enter to pay.

2. On arrival at site

- Park as near as it is practicable to the address to be visited, in such a position as to be able to drive straight off and in well-lit areas at night.
- Avoid as far as possible, waste ground, isolated pathways and subways, particularly at night.
- Keep aware of the nearest place of safety, such as shops.
- Remain aware of the behaviour of all persons either inside or near the building, looking for any signs or signals that may indicate a potential problem.
- Remain aware of the environment and maintain escape routes in case problems arise.

Beware of letting people into a secured building when you are alone. In some companies employees have name/photo badges. Ask to see such identification before letting someone into the building. Failing this, ask for a name and check this against an internal phone list. If still in doubt, phone your supervisor or Area Manager.

3. On leaving site

- Have your keys ready.
- Leave with others where possible.
- Don't delay when entering your vehicle and locking it.
- Don't waste time starting the car until you are secure.
- Apply the same rules when driving home as those stated at 1. above.

4. Extra points when driving

- Be very cautions if you are followed or flagged down.
- Don't leave the safety of your vehicle unless absolutely certain you are being asked to
 do by a bona fide uniformed police officer or fireman.
- Don't open your door to speak to anyone
- Keep the door locked and speak only through the small gap in your window.
- Be prepared to drive away to a safe place.

If you have driven away from somebody in uniform who you doubt to be genuine, ensure you report to the police as quickly as possible 1) to avoid embarrassment to yourself and 2) to give the police the opportunity of apprehending anyone impersonating an officer.

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People Issues Lone Working on Unmanaged Sites

All employees who work alone must ensure that a partner, spouse, friend or relative is aware that the Company has Emergency Procedures which can be put into action should the employee not return home from work at the expected time.

Employees must understand and fully comprehend the reasons for the emergency procedures within the organisation; to this end employees must have training in emergency procedures and this Policy.

Responsibility

It is the responsibility of the line manager/supervisor to ensure that the Emergency Contact Procedure is distributed to all staff who work alone. Staff should distribute the Procedure to their partner, spouse, friend or other person living at the same address.

Lone workers must be informed of the method of raising an emergency alarm for that contract should they become ill or have an accident at work which renders them incapacitated or immobile.

Action

Employees will be given necessary information and training to enable them to recognise the hazards and appreciate the risks involved with working alone.

Requests to ascertain the whereabouts of an individual must be actioned immediately following the procedure outlined in the Lone Workers Procedure. In the event of an accident at work, the accident reporting procedure must be followed as soon as possible.

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People Issues Lone Worker Contact Procedure

As a conscientious employer who values our staff, we are concerned that your partner/spouse/friend works alone on our behalf and could possibly be taken ill etc whilst working for us, and that this could possible go undetected for a period of time.

If you partner/spouse/friend does not arrive back from work at the normal time and has not told you that they were going to be late home for whatever reason and it is beginning to cause you concern, you can always ring us on 08453080998 And we will check that they are not still on the contract.

If you do ring us please ensure that you can give us their name and address, normal working hours, and the name and address where they work in order to save time on us getting to the site. We will also need your name and telephone number so that we can ring you back

Please retain this letter in a safe place for future reference should it be needed.

Workers Name:	
Home Address:	
Hours of Work:	
Address of Workplace	

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People Issues Lone Workers Practices & Procedures

A copy of the Emergency Contact Procedure must be issued to all employees who work alone either on a permanent basis or who may on occasion work on their own. The employee must be encouraged to distribute the emergency contact procedure to their partner, spouse, friend or relative, or other person living at the same address who should keep it in a safe place for future reference should it be needed.

To enable managers, supervisors and operatives to understand the emergency contact procedures within the organisation and the circumstances when they may be called into use, the following procedure should be followed:

- 1. Initial contact is made by the employee's family or friend.
- 2. The Operator or nominate contact should immediately attempt to contact the employee in question at the contract by telephone.
- 3. If no response is received from the contract the Helpdesk Operator must contact the Business Manager responsible for the site and inform them of the situation. In the event that the Business Manager cannot be contacted the Regional Manager must be informed.
- 4. The Business Manager must arrange for a Company representative or authorised Security Company to visit the site or otherwise attend themselves.
- 5. Once a site visit has been made, a report of the findings must then be relayed to the Helpdesk Operator or nominated contact.
- 6. The Helpdesk Operator or nominated contact must inform the employee's relative or friend of the situation. All such calls must be followed through.
- 7. In the event that the employee is found to be ill or has had an accident at work, appropriate First Aid should be administered and the emergency services called if required.
- 8. All accidents must be reported in the Accident Book
- 9. A log must be kept of any such incident identifying the following:
- Date and time of the call
- Full name and address of the employee works
- Name and address of the site at which the employee works
- Normal Working hours
- Name, address and telephone number of the person who has reported the incident
- The result of the findings at site
- Any follow up action that is required

The Lone Workers Policy and supporting documentation should be included in all site packs together with all other Health & Safety documentation.

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People Issues Lone Working on Managed Sites

Contract Management must ensure that there are suitable and adequate procedures in place depending on the type of work hazards associated with tasks to be carried out, and environments encountered. This may include one of the following:

- Issuing of radios, walkie-talkies, mobile phones, etc in which to keep regular contact. Due consideration must be given to any weak signal or un-contactable areas.
- Issuing of lone worker alarms, if appropriate.
- Physical checking of the lone worker at regular intervals.
- Lone worker ringing or bleeping Supervisor at agreed times.
- Check call system

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3.36 Maintenance of Plat & Equipment

3.36.1 General Statement

The Company will take all reasonable steps to ensure the safety of all employees maintaining the machinery as well as the safety of those affected by the maintenance work. The Company will liaise with the suppliers of all new machinery to establish how that machinery should be maintained safely.

The Company will see to inform and train personnel to implement this policy. The implementation of the policy needs the cooperation of all management and staff.

3.36.2 Arrangements for Securing the Health and Safety of Workers

The Company will, in consultation with the maintenance staff and their representatives:

- Carry out an assessment of how the machinery should be isolated for specific maintenance work
- 2. Carry out an assessment of how the machinery should be isolated to enable general maintenance work to be carried out safely
- 3. Carry out an assessment of the maintenance of the machine itself including any heavy parts that have to be moved, any positions that have to be reached to achieve the necessary result (e.g. climbing outside a safety barrier on a crane) and any risks of parts falling
- 4. Carry out an assessment of how the maintenance of the machine affects its environment
- 5. Carry out an assessment of all hazards that arise when guards have been removed
- 6. Take appropriate measures for the protection of any person carrying out maintenance operations which the assessment has shown to involve risk to health or safety
- Provide any personal protective equipment that might be necessary to carry out the work safely
- 8. Ensure that employees are aware of the reporting procedures, so that a responsible person is informed of any problems as soon as they arise and remedial action can be taken.

3.36.3 Information and Training

The Company will give sufficient information, instruction and training as is necessary to ensure the health and safety of all maintenance staff and any others affected by maintenance of the machinery.

Managers responsible for supervising the maintenance of the machinery will be appropriately trained.

3.36.4 Safe System of Work

The Provision and Use of Work Equipment Regulations 1998 outline the following safe systems of work.

1. Work equipment should be maintained in an efficient state, in efficient working order and in good repair.

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- 2. Maintenance logs should be kept up to date.
- 3. Appropriate work equipment should be provided with suitable means to isolate it from all sources energy. Appropriate measures should be taken to ensure that reconnection to the energy source will not expose any person using or maintaining the work equipment to any risk to his or her health or safety. Where any electrical power is involved in the machine to be maintained it should always be check that this is dead before work is started.
- 4. All persons who maintain machinery and all persons who supervise or manage the maintenance of machinery should have available to them adequate and readily comprehensible safety and health information and, where appropriate, written instructions pertaining to the maintenance of the machinery. This information will include the conditions in which, and the methods by which, the machinery should be maintained, any foreseeable abnormal situations and the action to be taken when they occur, as well as any conclusions to be drawn from experience in maintaining the machinery.
- 5. All persons who maintain or who supervise or manage maintenance of work machinery should have received adequate training for the purposes of their health and safety.
- 6. Measures should be taken to:
 - a. Prevent access to any dangerous part of machinery
 - b. Stop the movement of any dangerous part of machinery before any person enters a danger zone.
- 7. Where necessary a permit to work system should be rigorously adhered to
- 8. Isolation of all equipment or machinery from all sources of energy should be possible, and should be carried out before maintenance work commences (unless running maintenance is being carried out). Reconnection and isolation procedures must avoid any risks.

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3.37 New and Expectant Mothers

3.37.1 General Statement

The Company recognises it legal duty to protect the health and safety of new and expectant mothers. To achieve this, a risk assessment will be conducted once the Company has been notified that an employee is pregnant or if a new mother is employed. Measures will be implemented to ensure that new or expectant mothers are not exposed to hazards that may cause them harm.

A "new and expectant mother" is defined as a worker who is pregnant, who has given birth within the previous six months or is breastfeeding. "Given birth" is defined as having delivered a living child or, after 24 weeks of pregnancy, a stillborn child.

Risks may arise from physical, biological and chemical hazards as well as hazards associated with the working conditions and processes. The following are the main hazards that are associated with new and expectant mothers, at work, that may need to be eliminated or else adequately controlled. The risk assessment should consider these and any others that may be identified within an area of work:

- Slips, trips and falls the increasing size of a pregnant woman may adversely affect her balance, so slippery or uneven stairs, floors, paths etc are a particular concern;
- Standing or sitting for long periods;
- Mechanical vibrations/movement including travel;
- Manual Handling lifting, twisting, etc.;
- Excessive noise;
- Exposure to radiation-non-ionising and ionising;
- Extremes of temperature;
- Infectious or contagious disease, e.g. German measles and Listeriosis;
- Harmful substances- exposure to other people's tobacco smoke, lead, organic mercury chemicals;
- Display screen equipment IT work stations;
- Working hours duration per day, night working (suspension on medical certificate);
- Work-related stress working conditions, excessive workloads, travels during rush hour;
- Home working.

The medical condition of each new or expectant mother needs to be considered on the basis of advice from her doctor or midwife, where necessary. In addition, physiological changes must be taken into account when assessing the risks. These include:

- Morning sickness;
- Backache associated with prolonged periods of sitting or standing;
- Manual handling;
- Haemorrhoids and varicose beings associated with posture;
- Ready and easy access to toilets;
- Increasing tiredness as the pregnancy develops;
- Balance, as size increases.

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3.37.2 Arrangements for Securing the Health and Safety of Employees

Measures that will be implemented will include:

- 1. Assessing the risks involved and introducing control measures that arise from the assessment.
- 2. Implementing and monitoring the control measures.
- 3. Monitoring the employee through the development of the pregnancy and repeating risk assessments periodically e.g. every 6-8 weeks or if tasks change significantly.
- 4. Allowing time off to attend antenatal clinics.
- 5. Providing adequate and safety facilities for new and nursing mothers including rest facilities and suitable facilities for expressing and storing breast milk.

The persons responsible for implementing these arrangements have been defined in the Responsibilities Section.

3.37.3 Safe Systems of work

- 1. Employees should inform their line manager when pregnancy is suspected or confirmed so a suitable risk assessment can be carried out as soon as possible.
- 2. The employee should pass on any advice from her registered medical practitioner or midwife that could affect the assessment of her risk at work.
- 3. Newly appointed female staff should notify their line manager if they have given birth within the previous six months or are breastfeeding. If any employee continues to breastfeed for more than six months, she must notify her line manager so that this will be included in any generic risk assessment.
- 4. If a significant risk is identified then, following further assessment, one or more of the following solutions will be applied:
 - a. The manager will temporarily adjust working conditions and/or hours of work;
 - b. If it is not reasonable to do this or if it would not avoid the risk then alternative work will be arranged;
 - c. If no alternative work is available then paid leave, for as long as necessary to protect the health of the employee and the child, will be considered?

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3.38 Legionellosis

3.38.1 General Statement

All reasonable steps will be taken to identify potential Legionellosis hazards in the workplace and to prevent or minimise the risk of exposure to such hazards.

Where employees are concerned about the risk of an outbreak of Legionellosis, they should report their concerns to a responsible person so that the Company can take the appropriate measures to eliminate or reduce the risks.

3.38.2 Arrangements for the securing the Health and Safety of Workers

The Company will:

- 1. Carry out an assessment of the risks at each of the Company premises;
- 2. Where necessary, implement control measures to minimise the risk of infection;
- 3. Provide staff with instruction in the nature of the risks and the means of controlling exposure;
- 4. Ensure that staff can report any relevant symptoms or any concerns they have with conditions on Company premises or on client sites;
- 5. Ensure that, where relevant, client sites have adequate controls in place for the control of legionella bacteria;
- 6. Draw up a contingency plan in case of an outbreak of Legionellosis. This will include:
 - a. The identification of people who may have been exposed;
 - b. Involvement of the public health authorities;
 - c. Dissemination of information to employees and other interested parties of the nature of the risks.
- 7. Ensure that anyone carrying out control measures has received appropriate training so that they are able to perform their duties competently.

3.38.3 Safe System of Work

A comprehensive programme of hazard control should reduce the risk of occupationally acquired Legionellosis to a very low level in most workplaces.

Avoidance of Conditions Favouring Growth of Organisms

As far as practicable, water systems should be operated at temperatures that do not favour the growth of Legionella.

- 60°c is recommended for hot water storage
- Either above 50°c or below 20°c for distribution (care must be taken to protect people from exposure to very hot water).

Use of materials that may provide nutrients for microbial growth should be avoided. Corrosion, scale deposition and build up of biofilms or sediments should be controlled, and tanks should be lidded.

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Avoidance of Stagnation

Dead legs, (i.e. water services leading from the main circulation water system to taps or appliances which are used only intermittently), and other parts of systems which may provide a reservoir for infection should be eliminated.

Minimisation of Water Sprays

Dissemination of organisms should be reduced by careful design of equipment; use of drift eliminators to stop excessive circulation of potentially contaminated air or enclosure, etc.

System Maintenance

Water systems should be disinfected by an effective means before being taken into service and after shutdowns of five or more days. Plant must be regularly and effectively inspected and maintained (e.g. by monthly visits from a water treatment specialist). Plant should be disinfected periodically (normally twice yearly) by chlorination or temporary raising of water temperatures. Biocides may be used to control microbial growth. Maintenance personnel must wear appropriate protective clothing.

Sampling

Sampling for Legionella should not normally be necessary unless in the case of an outbreak or to monitor the effectiveness of precautionary measures. Weekly monitoring of chemical and microbiological water quality may give a useful indication of the state of the system.

Maintenance Procedures

Staff involved in plant maintenance or who might otherwise be at significant risk will require safe systems of work. The following should be their priorities.

- 1. Design procedures to minimise exposure (e.g. by prior disinfections).
- 2. Avoid creation of water sprays (e.g. by high pressure jetting).
- 3. Avoid exposure of others in the building tow after sprays (e.g. by carrying out maintenance out of normal working hours).
- 4. Wear respiratory protection of a suitable and HSE approved type (normally high efficiency, positive pressure respirators with either a full face piece or hood and blouse).
- 5. Take necessary precautions when entering confined spaces (permits to work, etc).
- 6. Handle biocides and water treatment chemicals with care.
- 7. Report relevant symptoms of illness to your supervisor immediately.

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3.39 Violence to staff

Securteam Limited recognises that there is a possibility of violence or assaults on staff within the Company's working environment. Should there be an assault on staff or the threat of violence the following procedure is to be followed:

- 1. If threatened with violence, the person being threatened is to move away but maintained vigilance at all times
- 2. When a safe distance has been achieved from the threat, the threatened person is to contact their manager and explain the situation
- 3. No employee of Securteam Limited is to retaliate verbally to any threat aimed at them or to engage in any argument. They should respond in a calm and polite manner taking care not to say anything that may exacerbate the situation.
- 4. In the event of a physical assault upon any employee of Securteam Limited the minimum force necessary to extricate themselves may be used. This is all the law allows them to use to protect themselves and others.
- 5. The person attached, if able, is then to report the matter immediately to their Manager or Supervisor. In his absence, the police are to be notified, at the same time notifying the Company offices.
- 6. At no time is any other member of the workforce or any third party to be endangered or put in jeopardy by any confrontation or action taken by the employees of Securteam Limited.
- 7. On receipt of a complaint from the workforce, the responsible Manager or Supervisor will investigate and try to calm the situation, if necessary by delaying any confrontation action and taking statements from all concerned.
- 8. Fighting with or any threatening behaviour towards any other employee of Securteam Limited or any third party is a serious offence. Anyone doing so will be sent home and become subject to the Company's disciplinary procedures at a later date.

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3.40 Communication and Consultation

3.40.1 General Statement

It is a requirement of the Health and Safety (Consultation with Employees) Regulations 1996 for employers to consult and communicate with employees on matters relating to health and safety. These regulations complement the Safety Representatives and Safety Committees Regulations 1977, which place duties on employers to consult with safety representatives who have officially been appointed as such by the trade unions.

3.40.2 Arrangements for Communication and Consultation

Consultation will be with the employees directly as there are, currently, no elected 'Representative of Employee Safety'. Employees will be consulted, in good time, on health and safety matters and in particular on:

- The content of this policy
- Any rules specific to a site or job
- Changes in legislation or working best practice
- The planning of Health and Safety training
- The introduction of new technology or the alteration of work equipment

Communication and consultation will take place directly with the employees via regular staff meetings held at head office, site meetings between Area Managers and staff, tool-box talks and the distribution of safety literature, memo's and the Company newsletter.

Information will only be withheld if:

- It is of significant commercial confidentiality;
- If there is a legal reason for not disclosing it;
- It is of a personal nature.

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3.41 Welfare Facilities

3.41.1 General Statement

'Welfare facilities' is a wide term, embracing both sanitary and washing accommodation at workplaces, provision of drinking water, clothing accommodation (including facilities for changing clothes) and facilities for rest and eating meals.

The Company recognises its obligation to provide sufficient, suitable, hygienic lavatory and washing facilities in all workplaces. It is the policy of the Company to provide these facilities in sufficient numbers to enable everyone at work to use them without undue delay.

3.41.2 Arrangements for Providing Welfare Facilities

The Company will, in consultation with workers:

- 1. Carry out an assessment of the requirements for welfare facilities for male and female staff and visitors, taking into account any special requirements for the disabled.
- 2. Provide an adequate number of, easily accessible, sanitary facilities which will be kept clean, well-lit and well maintained.
- 3. Provide washing facilities including: basins, hot and cold water and soap, towels or dryers.
- 4. Ensure that an adequate supply of wholesome drinking water is provided for all persons at work in the workplace. This must be readily accessible and conspicuously marked, if it could be confused with a non-drinkable, cold water supply.
- Ensure that suitable rest and eating facilities are available. Seats in work areas can be suitable provided the work area is clean. Facilities will include the means to prepare or obtain a hot drink and facilities to heat food, if the work place is remote.
- Provide suitable and sufficient accommodation for clothing that is not worn during working hours or for special clothing, worn by a persona t work, which is not taken home.

The person responsible for implementing this policy is defined in the Organisation and Responsibilities Section.

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