



Health & Safety Policy



September 2025



www.stallardkane.co.uk

9 LORD STREET, GAINSBOROUGH DN21 2DD T 01427 678 660
GAINSBOROUGH | LONDON | MANCHESTER | BIRMINGHAM | HULL

one of the team

Contents

| | |
|--|----|
| Health and Safety Policy Amendment Sheet | 4 |
| PART 1 STATEMENT OF INTENT | 5 |
| PART 2 COMPANY ORGANISATION | 6 |
| PART 2 RESPONSIBILITIES | 7 |
| Executive Chairman Responsibilities | 8 |
| Production Director Responsibilities | 9 |
| Nominated Person for Health and Safety | 9 |
| Competent Health and Safety Advisor | 10 |
| Managers Responsibilities | 11 |
| Employees | 12 |
| PART 3 GENERAL ARRANGEMENTS (SAFETY MANAGEMENT PROCEDURES) | 13 |
| 1.0 Systems and Procedures | 13 |
| 1.1 Consultation with Employees | 13 |
| 1.2 Safety Training | 14 |
| 1.3 Fire Safety | 15 |
| 1.4 Risk Assessment | 16 |
| 1.5 First Aid | 16 |
| 1.6 Mental Health First Aid | 16 |
| 1.7 Stress | 17 |
| 1.8 Accident Procedures | 18 |
| 1.9 Statutory Notifications of Accidents/Dangerous Occurrences | 18 |
| 1.10 Workplace Equipment Maintenance | 20 |
| 1.11 PUWER – Provision of Work Equipment Regulations 1998 | 21 |
| 1.12 Pressurised Systems (Compressed Air) | 22 |
| 1.13 Isolation and Lock-off Procedures | 23 |
| 1.14 Forklift Trucks, Electric and Diesel | 23 |
| 1.15 Pest Control | 25 |
| 1.16 Personal Protective Equipment (PPE) | 26 |
| 1.17 Respiratory Protective Equipment (RPE) | 27 |
| 1.18 Safety Harness and Lanyards | 27 |
| 1.19 Electricity | 29 |
| 1.20 Premises and Welfare | 29 |
| 1.21 Control of Substances Hazardous to Health (COSHH) 2002 | 29 |
| 1.22 Leptospirosis (Weil's Disease) | 31 |
| 1.23 Legionella | 32 |
| 1.24 Alcohol and Drug Abuse | 34 |
| 1.25 Company Smoke-Free Policy | 34 |
| 1.26 Asbestos | 35 |
| 1.27 Display Screen Equipment | 35 |

| | | |
|------|---|----|
| 1.28 | New and Expectant Mothers _____ | 36 |
| 1.29 | Working Time, Night Working and Shift Working _____ | 37 |
| 1.30 | Homeworkers/Working from Home (WFH) _____ | 37 |
| 1.31 | Health Surveillance Procedure _____ | 39 |
| 1.32 | Workplace Noise Control _____ | 40 |
| 1.33 | Vibration Control _____ | 41 |
| 1.34 | Manual Handling _____ | 43 |
| 1.35 | Construction (Design and Management) - Contractor _____ | 44 |
| 1.36 | Contractors/Sub-contractors _____ | 45 |
| 1.37 | Confined Spaces _____ | 46 |
| 1.38 | Permits to Work _____ | 46 |
| 1.39 | Transient workers _____ | 46 |
| 1.40 | Safe Working at Height _____ | 47 |
| 1.41 | Lifting Equipment and Accessories _____ | 49 |
| 1.42 | Driving for Work Purposes _____ | 50 |
| 1.43 | Loading and Unloading _____ | 51 |
| 1.44 | Traffic Management and Yard Safety _____ | 52 |
| | Environmental Policy Statement _____ | 53 |

Health and Safety Policy Amendment Sheet

Record of Amendments

| Issue number | Date | Index reference | Brief description of amendment |
|---------------------|----------------|------------------------|---|
| 1 | August 2025 | | First site visit and issue of documentation. |
| 2 | September 2025 | | Issue new policy with Andy Hamilton, Executive Chairman as Responsible person |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

PART 1 STATEMENT OF INTENT

1. Staircraft Group Ltd (The Company) recognises its health and safety duties under the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999 and accompanying protective legislation. The Executive Chairman, Andy Hamilton, recognises that they have a responsibility to ensure that all reasonable precautions are taken to provide and maintain working conditions which are safe, healthy and comply with all statutory requirements and codes of practice.
2. The Company, so far as is reasonably practicable, proposes to pay particular attention to:
 - a. The provision and maintenance of a safe place of work, a safe system of work, safe appliances for work, and a safe and healthy working environment
 - b. The provision of such information and instruction as may be necessary to ensure the health and safety of its employees and others, and the promotion of awareness and understanding of health and safety throughout the workforce.
 - c. Ensuring the safety and absence of health risks in connection with the use, handling, storage and transport of all articles, substances and equipment
 - d. Making regular assessments of risks to employees
 - e. Taking appropriate preventative/protective measures as identified by the risk assessments.
 - f. Appointing Stallard Kane Ltd to advise on statutory duties.
3. In order that the Company may achieve those objectives, it is important that employees recognise their duty, whilst at work, to take reasonable care for the health and safety of themselves and of other persons. Employees should also co-operate fully with the Company or anyone else concerned, to ensure that their obligations are performed or complied with fully.
4. The Company will ensure adequate resources both in terms of time and money are made available to the necessary people to ensure that the items listed above are implemented and all employees are provided with the necessary instruction, information, training and supervision to enable them to carry out their work without risk to themselves or others. An annual review of the Health and Safety Policy will also be undertaken to ensure it is relevant to the work being undertaken by the Company and all legislation quoted is up to date. Wherever necessary the policy will be developed and expanded.
5. The Company is also committed to the continuous development and improvement of the Company's health and safety management system. The Company will ensure that the health, safety and welfare of any employee or subcontractor is not compromised for financial or commercial gain.
6. All employees of the Company agree, as a term of their contract of employment, to comply with their individual duties under the Health and Safety at Work Act 1974, and the Management of Health and Safety Regulations 1999 and other legislation, and to generally co-operate with the Company so as to enable it to carry out its duties towards them. The attention of all employees is drawn to the attached safety rules and procedures, and employees should recognise that failure to comply with their health and safety duties and obligations can lead to dismissal from employment. In the case of serious breaches, such dismissal may be instant without prior warning.
7. This policy has been prepared in furtherance of section 2(3) of the Health and Safety at Work Act 1974 and binds all staff. The Company requests that its customers and visitors respect this policy, a copy of which can be obtained on demand.

Signed:

Andy Hamilton

Executive Chairman Responsible for Health and
Safety

September 2025



PART 2 COMPANY ORGANISATION

Company organisational chart – Management structure

Not available

PART 2 RESPONSIBILITIES

The Company has responsibilities under health and safety legislation towards:

- Employees
- Customers, visitors and the local community
- Members of the public
- Contractors/sub-contractors

All employees (general overview)

The Company's obligations can only be met by ensuring that all employees fully discharge their responsibilities.

Every employee must:

- Take reasonable care for the health and safety of themselves, and others who may be affected by their acts or omissions at work.
- Co-operate with management with regard to agreed health and safety arrangements and procedures.
- Know and keep to the rules and procedures relating to their work, and report to their immediate Manager all difficulties or hazards liable to endanger themselves or other persons.
- Not interfere with, or misuse, anything provided by the employer in the interest of health, safety and welfare.
- Report details to their immediate Manager, as soon as possible, if involved in an accident resulting in, or which may have resulted in, injury and in all cases before the end of the shift on which the incident occurs.
- Arrange for any spillage of dangerous substances or flammable liquid to be dealt with immediately, having due regard to the nature of such spillage.
- Use machinery and equipment only when authorised and properly trained to do so.
- Wear or use correctly all protective clothing and equipment issued to them and get replacements for lost damaged or defective items.

Executive Chairman Responsibilities

The Executive Chairman who has overall responsibility for health and safety is responsible for ensuring that the policy enables the Company to fulfil its legal duties and emphasises the determination to manage its activities so that standards of health and safety are continuously improved. The Executive Chairman will monitor conditions and the health and safety performance to determine whether the policy is adequately resourced, effective and is being developed to meet changing requirements.

The Executive Chairman Responsible for Health and Safety is responsible for ensuring that:

- Safe systems of work are in operation, and staff receive adequate and appropriate training.
- All personnel are aware of, and instructed in, their individual legal responsibilities, and that these are properly discharged.
- All work carried out, and all plant, machinery and equipment comply with the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999 and the Provision and Use of Work Equipment Regulations 1998.
- All plant, machinery and equipment are maintained in good working order, and any registered plant and small equipment carries valid certification.
- Information on safety, health and welfare matters is effectively communicated to all employees.
- All staff are conversant with the company and Health and Safety Executive accident reporting procedures (RIDDOR).
- Adequate first-aid facilities are available in accordance with current regulations, and suitable persons are trained in first aid to the required standard.
- Periodic statutory tests, inspections and maintenance of premises and equipment are carried out and records are properly maintained.
- Fire precautions and portable appliances are in place and are tested, maintained, and kept up to date with the latest legislative requirements.
- All staff are acquainted with the Emergency Evacuation Procedures and Emergency Plan.
- Suitable Personal Protective Equipment (PPE) is available, issued and in use.
- Staff are competent to carry out their work safely, and have received adequate information, instruction and training.
- A personal example is set by the wearing of appropriate protective clothing.
- All potential hazards, or reported hazards, are examined and evaluated and then eliminated or adequately controlled.
- Health and safety improvement suggestions received from staff are given due consideration.
- The following notices/documentation is displayed/held where required:
 - A signed copy of the Health and Safety Policy Statement of Intent.
 - Employer's liability insurance certificate.
 - Health and Safety Law poster.
 - First Aid (notifying the names and locations of the First Aiders).
 - Fire Exit signs (with directional signs and running person).
 - Accident Incident Book (BI510).

Production Director Responsibilities

The Production Director is responsible for ensuring that the policy enables the Company to fulfil its legal duties and emphasises the determination to manage its activities so that standards of health and safety are continuously improved. They will monitor conditions and the health and safety performance to determine whether the policy is adequately resourced, effective and is being developed to meet changing requirements.

It will be the Production Directors responsibility to ensure that:

- Systems are in place to review and update this policy annually, when major staffing changes occur, or when new equipment is introduced.
- Health and safety objectives for the Company are set and monitored.
- Sufficient arrangements, facilities and finances are available for fully implementing this policy.
- Safe systems of work are in operation, and staff receive adequate and appropriate training.
- Appropriate financial requirements for the Company's health and safety function are contained within the legal resources.
- The legal implications of relevant legislation are raised with and understood by relevant employees.
- Adequate resources are made available to allow the effective implementation of the Company's Health and Safety Policy.

Nominated Person for Health and Safety

The Nominated Person for Health and Safety is responsible for:

- The development and ongoing review of this policy, with the assistance of the external Health and Safety Advisors, Stallard Kane Ltd.
- Health and safety on a day-to-day basis – implementation of health and safety procedures, precautions and controls.
- Undertaking risk assessments within the area of their responsibility.
- Encouraging the highest possible standards of health and safety within their department by effective communication and consultation with employees.
- Monitoring standards of health and safety within their areas of concern.
- Ensuring good standards of housekeeping.
- Ensuring COSHH Risk Assessments are carried out within the area of their responsibility.
- The provision and maintenance of suitable personal protective equipment.
- Ensuring staff attend all training sessions.
- Carrying out hazard spotting checks within the area of their responsibility.
- Assessing and meeting health and safety training needs.

Competent Health and Safety Advisor

Stallard Kane Ltd have been appointed to advise and guide the company on health, safety and welfare issues related specifically to the Company's business undertakings. Stallard Kane Ltd will be responsible directly to the Directors, and all members of senior management within the Company.

Specifically, they will perform the following functions:

- Advise on the application and maintenance of the Company Health and Safety Policy arrangements.
- Maintain an up-to-date knowledge in matters of legislation and regulations as they apply and affect the Company and its Health and Safety Policy.
- Advise members of senior management on any related safety matters.
- Monitor the Company's health and safety status by auditing the Health and Safety Management System to guide their compliance with current legislation and company policy and standards.
- Assist senior members of management in maintaining a close liaison with the Health and Safety Executive inspectors and other appropriate organisations and departments relevant to the Company's undertaking.
- Advise members of senior management on training requirements for employees ensuring they are competent to carry out detailed tasks within the parameters of current safety legislation.
- Give advice on interpretation of legal requirements and working with all members of management.
- Advising and giving assistance with the strategy for implementation of this policy.
- Where requested, provide assistance with investigations of serious accidents/conducting investigations.
- Assist the Executive Chairman with revising this policy in the light of experience or legal change.
- Advise upon the visit of an Enforcement Officer.

Head Office:

9 Lord Street
Gainsborough
Lincolnshire
DN21 2DD

Telephone no:

01427 678660

Managers Responsibilities

- All Managers are expected to demonstrate by example their total commitment to health and safety matters.
- All Managers are responsible for their personal safety and that of all personnel under their authority, including others who may be affected by the Company's activities.

In particular, they will:

- Understand and implement the Company Safety Policy.
- Appreciate the responsibilities of personnel under their authority and ensure that each employee knows their own responsibilities and are equipped to play their part.
- Conduct risk assessments on activities within their department, ensuring that the methods and systems of work are safe and ensure that the necessary procedures, rules and regulations designed to achieve this are formulated, published and applied.
- Provide written instructions of work methods outlining potential hazards and precautions and ensure they are complied with fully.
- Ensure accident and near-miss reporting procedures are understood and complied with and assist with accident investigations where appropriate.
- Ensure all employees and sub-contractors are suitably trained/competent to carry out the prescribed task and that the necessary licenses/certificates of competence are in force and appropriate.
- Ensure the statutory notices, safety policy, insurance certificate and the names of appointed first aiders are displayed and maintained in prominent locations.
- Ensure that all new employees in the Company are provided with a copy of the policy statement, receive such induction training as may be laid down in procedures, are issued with personal protective equipment as required and are aware of their personal responsibilities as set out in this manual.
- Reprimand any employee for failing to discharge their health and safety responsibilities.
- Set a personal example with regard to health and safety matters.

Employees

The Management of Health and Safety at Work Regulations 1999 re-enacts the Health and Safety at Work etc. Act 1974, which places responsibilities on the employer and employees alike. In this connection, the Company reminds employees of their duties under Section 7 of the Act: to take care of their own health and safety and that of others who may be affected by their acts or omissions. Additionally, employees must also co-operate with the Company to enable it to discharge its own responsibilities successfully.

Furthermore, all employees are expected to:

- Carry out assigned tasks and duties in a safe manner, in accordance with instructions, and to comply with safety rules/procedures, regulations and codes of practice.
- Consult their Manager if aware of any unsafe practice or condition, or if in any doubt about the safety of any situation.
- Obtain and use the correct tools/equipment for the work and not to use any that are unsafe or damaged.
- Store all tools, equipment and personal protective equipment in the approved place after use.
- Ensure that all guards are securely fixed, and that all safety equipment and personal protective clothing/equipment provided are used.
- Not operate any plant or equipment unless authorised to do so.
- Report any accident, near-miss, dangerous occurrence or dangerous condition to their line management.
- Switch off and secure unattended plant or equipment.
- Avoid improvised arrangements and suggest safe ways of eliminating hazards.
- Not participate in horseplay or place fellow employees in danger by their actions.

PART 3 GENERAL ARRANGEMENTS (SAFETY MANAGEMENT PROCEDURES)

1.0 Systems and Procedures

The Company recognises the importance of health, safety and welfare, and will adopt a systematic approach towards ensuring that a healthy and safe environment is provided and maintained for all employees and other persons, who could be affected by their work activities. Equally important is the need for constant alertness by the Executive Chairman Responsible for Health and Safety and employees in identifying and eliminating potential hazards wherever possible.

It is the Company's primary objective that in conducting its activities, account must be taken by all parties of the need to:

- Formulate and maintain safe working systems, including work carried out during maintenance.
- Take all necessary steps to establish the causes of accidents and risks to health, which may occur, and to ensure that reasonable measures are taken to prevent recurrence.
- Ensure that no process, chemical or equipment is introduced unless it complies (where required) with statutory testing or examination requirements. Also, to ensure that, so far as is reasonably practicable, the health and safety of employees etc. will not be affected.
- Provide proper and adequate induction and training to ensure that all employees are fully competent in safe working methods applicable to their work.
- Encourage the closest possible liaison between the Company and employees in matters relating to health and safety.
- Ensure that all legal requirements relating to their activities are fully complied with and progressively improve upon the levels of health and safety performance.
- Consult with employees, and advise them of their legal duties and responsibilities, including the requirement to:
 - Abide by safe working systems.
 - Make use of facilities and equipment provided for their protection.
 - Refrain from any act which could endanger themselves or others.
 - Refrain from intentionally or recklessly interfering with, or misusing, anything provided in the interests of health, safety and welfare.
 - Report any known defect, which could endanger the health or safety of themselves or others.
 - Co-operate as far as is necessary to ensure legal requirements are met.

1.1 Consultation with Employees

A requirement of the Health and Safety (Consultation with Employees) Regulations 1996 is for the Company to consult with its employees in all matters relating to health and safety. The Company will convene regular meetings, to discuss all relevant issues relating to health and safety. In particular, the Company will discuss the following:

- When introducing new measures which may affect health and safety.
- The change in appointment of nominated competent persons.
- The provision of statutory health and safety information.
- Any statutory health and safety training.
- Health and safety of implications of introducing new technology, tooling or work activities.

The Company will ensure all employees are briefed on the Company Health and Safety Policy and other relevant health and safety information, firstly during their new starter induction when joining the Company, and periodically as the policy is updated or legislation is introduced/removed, or after any changes which may affect their health, safety and wellbeing.

All employees will be provided with health and safety information on an annual basis as a minimum, in the form of a Health and Safety Booklet created by the Company's external health and safety advisors. Employees will also be briefed by their Manager in the form of toolbox talks as required by the management team or advised by the Company's external health and safety consultants.

In the event that an employee's first language is not English or where they have any other condition which may affect their ability to understand written or verbal communication, the Company will take the necessary steps to ensure the required information is effectively communicated. This communication may include the use of existing employees who speak the same language as the affected employee or employees who can read the same language. Where necessary, the Company will ensure written documentation is provided in a suitable language for employees to understand.

All employees are reminded that the Company operates an open-door policy, and all employees are free to contact any member of the management team regarding any health and safety concerns they may have, or where they have ideas which may improve the health, safety and welfare of employees. All concerns or ideas raised will be given due consideration by the management team and feedback will be given to employees where appropriate.

1.2 Safety Training

Basic Training Considerations

The Company recognises that safety training is an integral and important part of its overall safety policy, and it will be given as a normal constituent of vocational training. No person will be employed on work involving any reasonably foreseeable significant risk unless he has received adequate training to help him understand the hazards involved and the precautions to be taken.

The Company will undertake a training needs analysis for all its employees, on an annual basis as a minimum, to ensure all employees have the necessary training and level of competence for the scope of works they undertake. The Executive Chairman is committed to providing sufficient funds and resources to ensure all necessary training is provided to employees.

Managerial Training:

The Company recognises, as fundamental to the success of the Company Safety Policy, that management should have received the training necessary to control effectively the areas for which they are responsible.

Safety Advisor Training:

Stallard Kane Ltd have been outsourced as the Company's external health and safety advisors. The Company has arrangements in place that ensures advisors are under periodic appraisals, as well as the need to maintain an up-to-date CPD as a part of professional bodies including IOSH, IIRSM etc.

1.3 Fire Safety

The Company will ensure all persons are kept safe at work and do not suffer ill-health or injury as a result of fire in the workplace.

Employers' Duties

The Company will:

- Ensure a suitable and sufficient risk assessment is undertaken by a competent person, to determine fire risks and the appropriate level of fire safety measures.
- Ensure appropriate arrangements for the planning, organisation, control, monitoring and review of preventive and protective measures necessary for the safety of employees in the event of a fire while they are at work.
- Reduce the risk from fire as far as is reasonably practicable and provide general fire precautions (including fire detection and fire alarms, if appropriate) to deal with any possible risk left.
- Nominate employees to implement these measures, make known their identities, and provide adequate training and equipment for such employees.
- Arrange any necessary contacts with external services, particularly in regard to rescue work, firefighting, first aid and emergency medical care.
- Co-operate and co-ordinate measures with other employers sharing the same workplace.
- Ensure that employers of any employees from outside undertakings are provided with comprehensible information on the risks to the health and safety of their employees and the measures taken to comply with the law.
- Ensure employees are provided with adequate safety training.
- Ensure that there are adequate access points for Fire Rescue Services

The current Building Regulations cover the means of escape and require that buildings should be designed and constructed so that there are appropriate provisions for the early warning of fire and appropriate means of escape.

Employees' Duties

Employees must:

- Take reasonable care of their own health and safety and that of other people who may be affected by their work.
- Co-operate with the employer as much as is necessary to ensure that any duties imposed upon the employer are performed.
- Inform their Manager or fire warden of any new or unidentified hazards.

The Company will ensure the fire risk assessment is formally reviewed annually or more often should the circumstances dictate.

1.4 Risk Assessment

All significant hazards will be identified, and the associated risks assessed. Significant risks will be recorded. Simple, effective control measures will be agreed, with the involvement of the employees affected. Safe systems of work will be produced and implemented in respect of all work activities where a significant risk has been identified. Written assessments and safety procedures will be carried out in all the production and administration areas and communicated to all affected employees. Specific risk assessments will include:

- Manual Handling
- PPE
- COSHH
- Fire
- Equipment where applicable

The Company will monitor and review all risk assessments and safe systems of work on a periodic basis to ensure they remain suitable and sufficient.

1.5 First Aid

The Health and Safety (First Aid) Regulations 1981 will be complied with, and a suitable number of persons will be nominated and trained and certificated to the necessary standard, as per the findings of a First Aid Risk Assessment to allow sufficient cover for all working hours and shift patterns.

Details of the first aiders will be displayed prominently for the benefit of all employees and visitors and brought to the attention of all new employees at their induction stage.

Stock levels of items required under the regulations will be checked at regular intervals and boxes will be kept secure, yet quickly available when required. Special arrangements will be made to provide cover where employees work away from Company premises.

The Executive Chairman Responsible for Health and Safety will ensure arrangements are in place to ensure a register of certificated first aiders is maintained and that a minimum level of cover is provided at all times.

1.6 Mental Health First Aid

The Executive Chairman has a responsibility for the health, safety and wellbeing of their employees along with creating and sustaining a mentally healthy work environment.

The Company will ensure:

- The first aid risk assessment considers not just physical health and risks, but also mental health and risks.
- They treat mental health in a similar way to physical health. For example, by having as many first aiders for mental health as for physical health.
- They build and maintain a workplace environment and culture that supports mental health and wellbeing and prevents discrimination (including bullying and harassment). Encouraging a non-stigmatising work environment for all employees.
- They manage and mitigate the risks of harm in the workplace by having ways to support people with mental health issues.
- They have qualified mental health first aiders to be able act through recognition of the signs and symptoms of mental ill health whilst increasing wellbeing levels of staff through positive support and guidance. Reducing the knock-on effects of mental health issues on employees and the workplace.
- Adequate mental health first aid cover is in place for periods of absence or multiple workplace sites.

- All employees are encouraged to maintain a healthy workplace through mental health awareness training or using resources provided.
- There is sensitivity in disclosure and maintaining confidentiality unless it is clearly unsafe to do so.
- That its policies and practices recognise the needs of those with mental health conditions.

The Company accepts that health and safety is their responsibility, however, they do also rely on the co-operation of all employees to meet this obligation. The Company considers that every employee has the obligation and right to inform management if they feel that their own health may be, or has been, affected in the course of their work.

The Company expects its employees to recognise that they have a duty to take reasonable precautions to avoid ill-health to themselves and others.

The Company will monitor and review the arrangements on mental health on a periodic basis to ensure they remain suitable and sufficient.

1.7 Stress

The Company is committed to protecting the health, safety and welfare of its staff and recognises that workplace stress is a health and safety issue. The importance of identifying and reducing workplace stressors is also acknowledged.

This includes:

- Improving the organisational environment through effective and consistent management.
- Enabling individuals to cope successfully with their work.
- Providing support to employees whose health and wellbeing are affected by stress.
- Managing and controlling factors which might result in excessive or sustained levels of stress.
- Increasing awareness of stress and its causes and methods to combat it.
- Assisting staff in managing stress in themselves and others.

As far as reasonably practicable the Company will:

- Provide management with advice and support to help identify specific causes of stress.
- Develop programmes for those with people management responsibilities to promote good management and team building skills.
- Provide suitable training such as time management, assertiveness and dealing with difficult/sensitive situations.
- Monitor the occurrence and levels of absence associated with stress.
- Provide support to all employees.

1.8 Accident Procedures

Details of all accidents will be recorded in the Accident Book, and where appropriate investigated by Stallard Kane Ltd. Employees are required to assist with any investigation of accidents and/or dangerous occurrences that take place within their work area.

The requirements of RIDDOR will be followed in respect of any recordable/reportable accident or dangerous occurrence.

1.9 Statutory Notifications of Accidents/Dangerous Occurrences

When a specified injury or dangerous occurrence has occurred, the HSE will be notified via, either the Incident Control Centre, or by the online notification form F2508 which will be completed without delay and not exceeding 10 days of the incident. Others to be notified as soon as possible are Stallard Kane Ltd and the Company's insurers.

Notifiable occupational diseases will be reported to the HSE via the online notification form.

Where a person is absent from work or unable to perform their normal working duties as a result of a work-related incident/accident over seven consecutive days, the HSE will be informed within 15 working days from the day of the accident, by use of the HSE's online report form, F2508.

The Company will still record all over-three-day accidents, just no longer report them to the HSE. The entry into the Company Accident Book of over-three-day accidents will be a sufficient means of recording them.

All reportable accidents or dangerous occurrences will be investigated, and a report issued. In their role as the Company's safety advisors, Stallard Kane Ltd will assist with the investigation and give advice and guidance. Action considered necessary to prevent a recurrence will be taken, and a report submitted to the enforcing authority.

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013

These regulations require certain accidents and dangerous occurrences at work to be notified to the Local Authority, and a guideline is set out below:

Accidents which require immediate reporting to the local HSE:

Work-related accidents

For the purposes of RIDDOR, an accident is a separate, identifiable, unintended incident that causes physical injury. This specifically includes acts of non-consensual violence to people at work. Please note, not all accidents need to be reported. A RIDDOR report is required only when:

- The accident is **work-related**.
- It results in an injury of a type which is **reportable** (as listed under 'Types of reportable injury').

When deciding if the accident that led to the death or injury is work-related, the key issues to consider are whether the accident was related to:

- The way the work was organised, carried out or supervised.
- Any machinery, plant, substances or equipment used for work.
- The condition of the site or premises where the accident happened.

If none of these factors are relevant to the incident, it is likely that a report will not be required.

Types of reportable injury

Deaths

All deaths to workers and non-workers will be reported if they arise from a work-related accident, including an act of physical violence to a worker. Suicides are not reportable, as the death does not result from a work-related accident.

Specified injuries to workers

The list of 'specified injuries' in RIDDOR 2013 (regulation 4) includes:

- A fracture, other than to fingers, thumbs and toes.
- Amputation of an arm, hand, finger, thumb, leg, foot or toe.
- Permanent loss of sight or reduction of sight.
- Crush injuries leading to internal organ damage.
- Serious burns (covering more than 10% of the body, or damaging the eyes, respiratory system or other vital organs).
- Scalping (separation of skin from the head) which require hospital treatment.
- Unconsciousness caused by head injury or asphyxia.
- Any other injury arising from working in an enclosed space, which leads to hypothermia, heat-induced illness or requires resuscitation or admittance to hospital for more than 24 hours.

Over-seven-day injuries to workers

This is where an **employee, or self-employed person, is away from work or unable to perform their normal work duties for more than seven consecutive days** (not counting the day of the accident).

Injuries to non-workers

Work-related accidents involving members of the public or people who are not at work will be reported if a person is injured and is taken from the scene of the accident to hospital for treatment to that injury. There is no requirement to establish what hospital treatment was actually provided, and no need to report incidents where people are taken to hospital purely as a precaution when no injury is apparent. If the accident occurred at a hospital, the report only needs to be made if the injury is a 'specified injury' (see above).

For example:

- The collapse, overturning or failure of load-bearing parts of lifts and lifting equipment.
- Plant or equipment coming into contact with overhead power lines.
- Explosions or fires causing work to be stopped for more than 24 hours.

Reportable dangerous occurrences

Dangerous occurrences are certain, specified 'near-miss' events (incidents with the potential to cause harm). Not all such events require reporting. There are 27 categories of dangerous occurrences that are relevant to most workplaces. For example:

- The collapse, overturning or failure of load-bearing parts of lifts and lifting equipment.
- Plant or equipment coming into contact with overhead power lines.
- Explosions or fires causing work to be stopped for more than 24 hours.

Certain additional categories of dangerous occurrences apply to mines, quarries, offshore workplaces and certain transport systems (railways etc). For a full, detailed list, refer to the online guidance at: www.hse.gov.uk/riddor.

Reportable occupational diseases

The Company will report diagnoses of certain occupational diseases, where these are likely to have been caused or made worse by an employees' work. These diseases include (Regs 8 and 9):

- Carpal Tunnel Syndrome.
- Severe cramp of the hand or forearm.
- Occupational Dermatitis.
- Hand-arm vibration syndrome.
- Occupational Asthma.
- Tendonitis or Tenosynovitis of the hand or forearm.
- Any occupational cancer.
- Any disease attributed to an occupational exposure to a biological agent.

Recording requirements

Records of incidents covered by RIDDOR are also important. The Company will ensure that they have collected sufficient information to allow them to properly manage health and safety risks. This information is a valuable management tool that can be used as an aid to risk assessment, helping to develop solutions to potential risks. In this way, records also help to prevent injuries and ill health, and control costs from accidental loss.

Records of the following will be maintained:

- Any **accident, occupational disease or dangerous occurrence** which requires reporting under RIDDOR.
- Any other occupational accident which causes injuries that result in a worker being away from work or **incapacitated for more than three consecutive days** (not counting the day of the accident but including any weekends or other rest days). The Company does not have to report over-three-day injuries to the HSE, unless the incapacitation period goes on to exceed seven days. Entries into the Company accident book will be a sufficient means of recording all over-three-day injuries.

The Company will produce RIDDOR and accident book entry records when requested by the HSE, the local authority or any other statutory inspectors.

1.10 Workplace Equipment Maintenance

All new and existing equipment and facilities will be sufficiently designed, constructed and installed, so as to be safe and without risk to the health and safety of employees.

An adequately planned maintenance system will be operated, and records maintained.

Safe systems of work will be used and updated, such that protection against foreseeable maintenance hazards is provided.

All legally required maintenance, testing and inspections will be carried out and records kept in accordance with statutory provisions, insurer and fire authorities' approved codes.

Only qualified electricians are permitted to carry out work on electrical wiring and apparatus, using safe systems of work.

1.11 PUWER – Provision of Work Equipment Regulations 1998

Work Equipment – The Company

The Company recognises the need for suitable, safe and regularly maintained work equipment in accordance with the Provision and Use of Work Equipment Regulations 1998 (PUWER).

Therefore, the Company will always aim to comply with PUWER by:

- Regularly maintaining work equipment by competent personnel.
- Assessing the suitability of work equipment supplied by the Company.
- Providing training in the use of work equipment supplied by the Company.
- In addition to training, providing technical and safety information in regard to work equipment to employees as necessary or upon request.
- Keeping up to date maintenance and training records of work equipment.
- Consulting employees in matters of health and safety in the workplace.
- Performing risk assessments on the use of work equipment.

The Company will elect individuals responsible for the maintenance and provision of work equipment to also act as a direct point of contact for employees.

Work Equipment – Employees

Work equipment can be defined as any equipment supplied and used by the Company. Under the Provision and Use of Work Equipment Regulations 1998 (PUWER) the Company must maintain and supply work equipment suitable for its intended use. Therefore, whenever an employee uses work equipment they must:

- Only use equipment when authorised and trained to do so.
- Avoid modifying equipment outside of the manufacturers' specification.
- Check the equipment beforehand for any defects.
- Only use equipment suitable for the task.
- Use all equipment in compliance to Health and Safety Regulations.
- Report any defects to their Manager.
- Co-operate with management when asked to return equipment for inspection/maintenance/calibration.

1.12 Pressurised Systems (Compressed Air)

The Company has a duty to provide a safe work equipment to minimise the risks when working with systems or equipment which contain a liquid or gas under pressure. The Company will ensure that the following precautions under the use of compressed air to comply with The Pressure Systems Safety Regulations 2000 are followed:

- All pressure equipment and systems will be properly maintained. There will be a maintenance programme for the system as a whole. It will take into account the system and equipment age, its uses and the environment. Systems will be depressurised before maintenance work is carried out. A safe system of work is in place so that maintenance work is carried out properly and under suitable supervision.
- All components of pressurised systems will be formally inspected regularly by qualified and trained employees.
- A written scheme of examination is formally developed by a trained and competent person. The written scheme must specify the nature and frequency of examinations and include any special measures that may be needed to prepare a system for a safe examination. The pressure system will not be operated until a written scheme of examination has been developed and ensured that the system has been examined.
- Suitable protective devices are fitted and that they are functioning properly.
- Employees operating pressurised systems will have the necessary skills and knowledge to carry out the task safely. Employees have access to operating instructions for all the equipment, including how to deal with emergencies.
- Employees have full understanding of the safe operating limits of the system and any equipment directly linked to it or affected by it.
- Air lines are inspected frequently for defects and proper connections with any defective equipment repaired or replaced immediately by a trained and competent person.
- Air hoses are kept free of grease and oil to reduce the possibility of deterioration.
- Hoses are not strung across floors or aisles where they are liable to cause personnel to trip and fall.
- Before a pneumatic tool is disconnected (unless it has quick release fittings), the air supply will be turned off at the control valve and the tool bled.
- Pressurised systems/compressed air will not be used under any circumstances to clean dirt and dust from clothing or off a person's skin.
- Air lines are made of high-quality materials, fitted with secure connections.
- Operators avoid bending or kinking air hoses.
- Compressed air lines are identified to maximum working pressures (psi), by tagging or marking pipeline outlets.
- The issuing of suitable PPE such as goggles, face shields or other eye protection etc.

The Company will monitor and review the arrangements on pressurised systems on a periodic basis to ensure they remains suitable and sufficient.

1.13 Isolation and Lock-off Procedures

Where maintenance requires that normal guarding is removed, or access is required inside existing guarding, the Company will implement additional measures to protect the health and safety of its employees (and others in the vicinity), from dangers of the mechanical, electrical and other hazards that may be exposed. The Company control this by:

- Identifying what isolation/lock off procedures are required, and in what circumstances – such as cleaning or maintenance.
- Implementing and developing the isolation/lock-off procedure including, risk assessment and safe systems of work/permit to work.
- Ensuring isolation/lock off procedures are formally communicated to the necessary personnel to ensure they are fully understood.
- Only authorising competent/trained persons to carry out this work.
- Ensuring that the effectiveness of the isolation/lock off is verified by a suitably competent person, before working on the equipment/machine.
- Ensuring isolation/lock off of equipment is carried out under supervision to ensure the procedures are followed.
- Monitoring and reviewing the isolation/lock off procedure and control measures to ensure that it is still working effectively.

1.14 Forklift Trucks, Electric and Diesel

The Company has carried out a specific risk assessment relating to the use and traffic movement of forklift trucks on site.

All forklift truck operators will be adequately and suitably trained as competent, hold the valid certificate and will be expected to operate the forklift truck as they have been trained to. Only trained and authorised operators will be permitted to operate forklift trucks on site.

Employees should carry out safety checks of forklift trucks on a daily basis, these checks should be recorded. All operators will keep to site rules and regulations with regards to speed limits and access around site.

Site Traffic Management

Operators of forklift trucks will be aware of pedestrian and other vehicle movement at all times. Operators will be able to see round their vehicles whether it be large or small and stop when pedestrians are in their vicinity.

Signage indicating vehicle movement will be displayed in suitable locations with pedestrians having to wear hi-visibility clothing as part of the control measures highlighted in risk assessments. Where there is a risk that pedestrians may step out into traffic from a doorway a suitable barrier will be placed for prevention.

Forklift trucks should be fitted with suitable warning beacons and reversing alarms

Refuelling and Diesel Fumes

Refuelling poses potential safety hazards due to the fuel's flammability risk. To best mitigate the hazards of refuelling a forklift, the Company will have in place a designated refuelling area, built solely for the purposes of refuelling in a safe controlled environment.

Potential sources of ignition such as cigarettes or tools that spark will be kept well away from refuelling areas. Refuelling areas will be built with high levels of ventilation to allow toxic fumes to dissipate efficiently reducing the potential for fire to occur.

Exhaust emissions from diesel engines are usually more visible than those emitted from petrol engines because they contain over ten times more soot. In general, diesel engines produce less carbon monoxide (CO) than petrol engines but more oxides of nitrogen, sulphur oxides, aldehydes and particulate matter. To reduce the risk of exposure to employees, the Company will restrict the use of internal combustion engine powered forklift trucks in poorly ventilated or confined spaces and where required install suitable and sufficient ventilation systems.

As diesel is classified as a flammable liquid, the Company will carry out an assessment of the risks and eliminate or control them, so far as reasonably practicable, to ensure compliance with the Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) 2002 and Control of Substances Hazardous to Health (COSHH) 2002.

The Company will ensure that a suitable and sufficient risk assessment is carried out, along with safe systems of work, and formally communicate to the necessary operators. Only trained and authorised operators will be permitted to carry out the refuelling of forklift trucks.

The safe systems of work will include:

- Refuelling outdoors or in well ventilated area, away from sources of ignition. No smoking/naked flames etc.
- Inspection of the fuel tank and pump prior to refuelling, looking for signs or leaks, wear and tear.
- Ensuring there is suitable and sufficient training in place.
- What to do in the case of a spill/protecting the environment.
- Access to a suitable fire extinguisher, first aid and eye wash station.
- Issuing of suitable PPE etc.

General Diesel Storage:

- Tanks will be located in well-ventilated positions, separated from buildings and structures, process areas and the site boundary but in positions that are easily accessible by the emergency services.
- Diesel will be stored in either a bunding tank or have a secondary containment installed around the tank which can hold 110% of the capacity of the tank.
- Tanks will be stored in an area where there's minimal risk of damage by impact, weather or machinery. Where possible suitably position barrier rails to minimise the risk of impact damage to bunds, pipework and associated fittings will be installed.
- In areas that are away from risk from flooding, at least 10 metres clear of inland or coastal waters and also 50 meters of a spring.
- Tanks to be placed on an impermeable surface if close to where deliveries are made, and when fuel is being dispensed.
- Warning signage such as 'Flammable', 'No Naked Flames' and 'No Smoking' will be displayed in a prominent area.
- Easy access to suitable foam firefighting equipment.

Battery Charging

Electric forklifts produce zero emissions, virtually eliminate the hazard of carbon monoxide poisoning, and run more quietly than internal combustion forklifts. However, electric forklifts present other serious hazards that must be addressed. The company will ensure that a suitable and sufficient risk assessment is carried out, along with safe systems of work, and formally communicated to the necessary operators. Only trained and authorised operators will be permitted to carry out charging operations.

The safe systems of work will include:

- Designated battery charging areas, which are well-ventilated and away from sources of ignition.
- Access to a suitable fire extinguisher and eye wash station
- Issuing of suitable personal protective equipment etc

1.15 Pest Control

Due to the nature of the premises, from time to time there may be signs of rats and/or mice within the working areas.

Rats and mice are a major hazard to health. They are responsible for the spread of many diseases, some of which can be fatal to man. They eat food which may be intended for human consumption and contaminate much more, with their urine, droppings and fur, which must then be disposed of. They will also cause structural damage to property by gnawing through woodwork, wires, pipes and household items.

Rats have also been known to spread the following diseases:

- Listeria and Pasteurella – which cause food poisoning and stomach bugs.
- Leptospira – which causes flu like symptoms.
- Worms – which can lead to general ill health.
- Cryptosporida and Toxoplasma – which cause Diarrhoea.

It is necessary therefore for the Company to take the following precautions:

- Carry out a risk assessment and implement suitable control measure.
- Pest control works, including inspections, are only carried out by competent and trained specialist.
- Only safety options and substances are used to control pests.
- Ensuring procedures and control measures are monitored and reviewed to ensure the pest control systems that are in place are still working effectively.
- Good building maintenance is followed - fill in any gaps around any pipework to the outside of the building and cover any ventilation grills or airbricks with a fine metal mesh.
- Employees are trained to look out for signs that will reveal whether rats or mice are present, such as:
 - Damage from gnawing and feeding such as tooth marks on packaging and wires; or shredded paper which is used for nesting.
 - Small holes - mouse holes are 20mm in diameter.
 - Greasy smears along walls, skirting boards and pipes from rodent fur.
 - Droppings - mouse droppings are normally about 5mm long, and rat droppings are 1-2cm long.
 - Mice make nests, sometimes found indoors, in lofts or under floorboards; rats are burrowing animals and generally burrow near rubbish, or sources of food.
 - Scratching and gnawing sounds from the loft, under the floorboards and in wall cavities.
 - Rats secrete urine as they move and eat, so be aware of any unusual smells.
- All staff have a duty to report sightings of pests, or the suspected presence of pests to their Manager immediately.

Employees must adhere to the control measure put in place following risk assessment, such as:

- Keeping their working area and particularly the kitchen clean and tidy.
- Keeping their working area in good repair so that rodents cannot gain access to it. Any issues must be reported to a Manager.
- Ensuring that no food is left around the office or cabins to prevent rodents from being encouraged onto the property. Use sealed metal or plastic containers to store food, which will prevent rodent access.

Where possible removing rubbish and debris from the immediate vicinity of offices and cabins. Any issues must be reported to a Manager.

1.16 Personal Protective Equipment (PPE)

Responsibilities

Production Directors will be responsible for ensuring that only PPE to the correct standards has been issued and used. Production Directors will ensure that all persons under their control are equipped with, and use correctly, any PPE provided to them. They will also ensure that risk assessments relating to their work are reviewed to enable them to identify what safety precautions (including PPE) should be in place.

PPE assessment

In accordance with the Personal Protective Equipment at Work Regulations 2022, an assessment of the PPE requirements of each employee, including Limb (b) classed workers, will be made using the PPE Issue Record Form. For the purposes of co-ordinating safety management, the PPE assessment will be included in the Company's general assessment procedure detailed below. It should be noted at this point that PPE would be used only as a last resort measure. Where a hazard to an employee is identified, though the exact risk level is not known, then that employee will be given the maximum possible protection until an adequate risk assessment has been carried out.

PPE correct standards

All personal protective equipment purchased by the company shall be manufactured to the correct safety standards; any items that do not meet the relevant standard shall not be used by the Company. Management, in liaison with the Company safety advisors, will ensure that the correct standard equipment is being purchased, issued and signed for on the appropriate form.

Issue of PPE

Employees will be issued with all necessary PPE relating to the hazards from their work activity, or as a result of the findings of any risk assessment which relates to their work environment. Where an employee makes a reasonable request for additional equipment, this will be reviewed by their Manager and where appropriate the equipment will be supplied.

Replacement of equipment

All PPE will be replaced on a new for old basis. Re-issue or replacement of worn-out PPE will be requested using the record form, which will be held in the office, in order that usage can be monitored. Any PPE which is so worn or damaged that it no longer affords adequate protection will be replaced before the employee is allowed to continue work. PPE which has a shelf life or maximum usage period will be replaced in accordance with manufacturer's instructions.

Training – correct use

Employees who are required to use PPE to ensure their safety will be given training in its correct use. All training will be provided in accordance with the manufacturers' guidance.

Personal preference

Whilst every reasonable effort will be made to ensure that PPE satisfies requirements, the Company cannot guarantee to satisfy an individual's preferences. Once issued, PPE must be worn. It will not be left to the employee's discretion.

Damage/misuse

It will be the responsibility of the employee to report any faulty or damaged safety equipment to their Manager. It must then be exchanged as soon as possible. Employees will not alter, deface or otherwise misuse any safety equipment supplied to them.

Maintenance

It will be the responsibility of each employee to ensure that PPE is maintained in good order. In order that employees can be correctly equipped with safety equipment at short notice, a reserve stock will be held by the office.

1.17 Respiratory Protective Equipment (RPE)

The Company is aware of the concerns regarding the correct and safe usage of Respiratory Protective Equipment (RPE), specifically in respect of facial hair. The below information makes clear the Company's position on RPE.

Where RPE is used as a control measure under Health and Safety Legislation it is vital that the selected RPE is adequate and suitable.

Many of the gases, vapours and dusts that cause serious damage to lungs and other parts of the body can be invisible to the naked eye and RPE is designed to protect employees from these hazardous substances that can cause serious illness and disease.

The Company will prevent or control the exposure of employees to hazardous substances at work. Employees have a legal duty to co-operate with their employers and use control measures provided, including RPE, in accordance with the instruction, information and training provided.

RPE must reduce exposure to as low as reasonably practicable, and in any case to an acceptable level - below any applicable Workplace Exposure Limits or Control Limits. To ensure that the selected RPE has the potential to provide adequate protection for individual wearers, the Approved Code of Practice's (ACoPs), which stipulate that tight-fitting RPE must be fit tested as part of the selection process. RPE Face fit testing will be conducted by a competent person. This will help to ensure that inadequately fitting facepieces are not selected for use. Ill-fitting facepieces can create inward leakages of airborne contaminants.

Facial hair/stubble and beards make it very difficult to get a good seal of the mask to the face and this renders the RPE ineffective exposing employees to the risk of hazardous substance inhalation and the associated damage to an employee's lungs and health.

Should employees choose not to be clean shaven when carrying out duties requiring RPE, preventing them from carrying out the task safely, this would be in breach of the Company policy. This may result in a disciplinary action under the Company's disciplinary procedures.

If there is a good reason preventing employees from being clean shaven, such as religious or medical requirements, then employees must report this to their Manager and the Company will look at any appropriate reasonable adjustments.

1.18 Safety Harness and Lanyards

The Company will identify and detail the safety requirements and checks to be carried out to ensure safe use of safety harnesses and lanyards.

When selecting the correct harness, the Company will conduct an assessment and ensure it is suitable for the task in hand and will also take into considerations of the person's body type and shape.

All harness wearers

Where an employee is required to wear safety harnesses, they will be given suitable training in the correct fitting and adjustment of the harness and the choice of suitable anchorage points. If an employee believes that they may require additional training, they must contact their Manager immediately. Records of training are to be kept.

The maintenance instructions on the History Record Card supplied with the equipment are to be fully complied with, in particular the following:

- The date of first taking an item of equipment into use is to be inserted on the History Record Card and indelibly marked on the white tab on the equipment.
- Light or more ingrained dirt on the fabric of the safety harness/belt can be removed with soap or mild detergent. Rinse with clean water, remove surplus water and allow to dry naturally away from a direct source of heat.
- Heavy deposits of, for example, paint, may be removed with a diluted solution of heavy-duty detergent and water. The diluted liquid should be worked into the fabric with a brush and rinsed off with clean water. As above, wipe as dry as possible and allow to dry naturally. When the equipment is dry it should be thoroughly examined before use.

Note - Solvents, i.e. thinners, must not be used to remove deposits from the safety harnesses.

It is essential that safety harnesses and lanyards are regularly inspected and efficiently maintained and to this end the following instructions are to be strictly complied with:

All safety harnesses and lanyards are to be inspected periodically by a nominated competent person as below:

- Before each occasion of use. Safety equipment will be carefully examined by the user and, in particular, the following:
 - The safety lanyard which should not be exposed at the ends of the sheath and the sheath not damaged. Lengths will be checked every 6 months against the "as new" length. Extension of more than 10% indicates the lanyard should be taken out of service and scrapped.
 - The lanyard will also be examined for any cuts, external wear or abrasion which may weaken it. Note - If in any doubt as to the safety of a lanyard, it will be withdrawn from service.
 - The webbing, checking that it is not worn or damaged and all stitching is intact.
 - Metal fittings are free from corrosion, fracture or other damage. In addition, check moving parts, ensure the bar closes itself fully and the locking device prevents opening under firm pressure.
 - The equipment is free from signs of contamination by corrosive/harmful substances, e.g. alkali, acid, paint stripper, diesel, etc.
- When any harness is subject to sudden strain or sustains any damage whatsoever, the circumstances should be reported to a Manager and the harness withdrawn from service for inspection.
- A formal, in-depth inspection is carried out periodically at minimum intervals specified by the risk assessment and inspection regime. It is recommended that there is a detailed inspection at least every six months.
- The date of the survey, relevant comments and signature are to be recorded on the History Record Card. This would be carried out by a competent member of management.

Harnesses or lanyards, which show signs of excessive use or damage, or have been subject to considerable strain due to a fall of the user, should be withdrawn from service forthwith.

1.19 Electricity

Electrical equipment will be properly maintained to ensure that it is safe for normal use. All portable appliances will be examined prior to first use, then examined, and tested regularly thereafter. A register of appliances will be produced and kept up to date. The findings of inspections and tests will be recorded. Only qualified electricians are permitted to carry out work on electrical wiring and apparatus, using safe systems of working.

Any personal electrical appliances such as radios, charges etc must not to be brought into the workplace without permission from management. Should personal items be permitted by management, they will be captured by the Company's regular PAT testing regime.

Where practicable, equipment will be switched off when not in use, or on leaving the premises. All cabling, plugs and connections will be properly organised, inspected, recorded and maintained to minimise any risks, in accordance with the regulations.

Employees will not carry out maintenance on electrical equipment or plugs without prior authority and training. Employees' personal electrical apparatus is not to be used on company premises without prior permission.

The mains electricity supply will be inspected, and a certificate of test obtained from a 'Competent Person' in accordance with the timescales laid down in the regulations.

1.20 Premises and Welfare

Environment, welfare and other related facilities will be maintained to the standard required by the Health and Safety at Work etc. Act 1974 and the Workplace (Health, Safety and Welfare) Regulations 1992. Particular attention will be given to the general fabric, temperature, ventilation, purity of air and water supplies, lighting, sanitary conveniences and noise.

Where Company employees are required to undertake work on site, the Executive Chairman Responsible for Health and Safety will ensure at the planning stage, that the requirements for welfare provision are suitably assessed and provisions made before work commences on site.

1.21 Control of Substances Hazardous to Health (COSHH) 2002

The requirements of the COSHH Regulations 2002 and other related legislation will be satisfied. All necessary precautions will be taken in the use, storage and transportation of any material or substance. The least hazardous type of any substance will be used or purchased in order to minimise any associated risk. There will be regular assessments and monitoring to ensure that this is achieved. No new substances will be introduced into the workplace until the information regarding possible hazards and the necessary precautions to be observed have been fully evaluated by a competent person.

Responsibilities

The Company will ensure that this section is implemented and that all employees are given adequate information about any substances which are to be used. Management will ensure that the significant findings of any COSHH Assessment, including the safety precautions to be adopted, are communicated to all employees who will be exposed to the substances. Employees will not use any substances unless a COSHH Assessment has been carried out and its findings communicated to them. If an employee has not received a COSHH Assessment or the relevant training, then they will cease use immediately and report to their Manager.

Hazardous Substances Register

Managers will create and maintain a Hazardous Substance Register. The register will contain Hazardous Data Sheets for every substance purchased by the Company. These data sheets will be supplied by the supplier of the substance and will be formatted so as to provide clear health and safety information, including first aid, fire precautions, emergency action, correct storage and safe handling.

COSHH Assessment

A COSHH Assessment will be carried out for every substance, or where practicable on substance groups, i.e. solvent based paints grouped onto one assessment. All COSHH Assessments will be carried out on the standard form. The format of the assessment is such that it takes the following factors into account:

- Type of substance.
- Work location/environment.
- Work duration.

All assessments will be in writing and will be held available for inspection at all times at an appropriate point in the workplace. A central file will be created which will contain master copies of all assessments carried out.

COSHH Assessments will be reviewed at the following times:

- If the work environment changes.
- If it is requested by the employee.
- In any case every 12 months.

Any review will be recorded on the assessment with a review date and the name of the person who carried out the review.

Substance Substitution

Wherever possible, hazardous substances will be replaced with less hazardous ones. It will be the responsibility of management to investigate the availability of replacement substances and put them to use as soon as possible. Substances must also be assessed as necessary. Advice from Stallard Kane Ltd shall be sought where applicable.

Safety Precaution Advice

Any safety precautions recommended as a consequence of a COSHH Assessment will be adhered to at all times while the substance is in use.

Handling and Storage

All hazardous substances will be stored in correct storage facilities away from the work area. Storage facilities will be kept locked at all times and will be constructed as such that they do not pose a risk to the substance and will not allow any spillage to leak out. Safety notices will be posted on all storage facilities warning of the dangers associated with the substances being stored together. The Hazard Safety Data Sheets for all substances being stored will be available at the storage facility.

Only the minimum quantity required for immediate work will be removed from the storage facility. Persons required to handle hazardous substances will be given training in both correct handling techniques and safety precautions for hazardous substances. All spillages will be soaked up using suitable absorbent materials, contaminated materials are then to be disposed of in accordance with local authority rules. Hazardous substances are not allowed to enter any drain or watercourse. Management will be informed of any substantial spill immediately.

Information and Training

All employees who may be exposed to any hazardous substances will be informed of the existence of the Hazardous Substances Register and COSHH Assessment files at their safety induction. They will be instructed to use these documents as reference to ensure that safety precautions are adhered to.

1.22 Leptospirosis (Weil's Disease)

The Company recognises the seriousness of the disease and will take all precautions to prevent exposure to its employees. Work is considered higher risk where there is evidence of rat infestation. The Company is aware that symptoms may include severe headaches, fever, vomiting, jaundice and skin haemorrhages. Some persons may suffer meningitis, encephalitis or renal (kidney) failure.

To achieve the necessary control and risk reduction, the Company will ensure:

- A suitable and sufficient risk assessment is conducted to identify potential risks and implement measures to either eliminate or control risks.
- Measures are established to ensure avoidance of contact with water, soil or animal products that may be contaminated with animal urine. If such activity is unavoidable, limit the time employees are working within the contaminated area.
- Cuts or abrasions on the skin are covered with a waterproof plaster.
- Personal hygiene is of a high standard.
- Hands and arms are washed before eating, drinking or smoking.
- Suitable personal protective equipment is provided and worn.

1.23 Legionella

All reasonable steps will be taken to identify potential legionellosis hazards and to prevent or minimise the risk of exposure. At risk systems include hot and cold-water storage and distribution systems. To achieve control of legionella bacteria the Company will implement the following in all areas within the Company premises where employees, contractors and visitors may be exposed to water systems:

Provide Appropriate Management

- Identify the statutory duty holder who is responsible for ensuring the development, implementation, and maintenance of an effective Legionella Management program.
- Identify a responsible person to assist the statutory duty holder with written communication of these duties and the persons acceptance and acknowledgement of these duties.
- Ensure all employees are aware of their responsibilities and adhere to safe work practices.

Establish Risk Assessment and Control Measures

- Conduct a suitable and sufficient risk assessment to identify potential risks and implement measures to either eliminate or control risks.
- Establish measures to ensure avoidance of conditions favouring growth of organisms, between 20-50°C.
- As far as practicable, water systems will be operated at temperatures that do not favour the growth of legionella. Hot water storage cylinders (calorifiers) should store water at 60°C or higher. Hot water should be distributed at 50°C or higher (thermostatic mixer valves need to be fitted as close as possible to outlets, where a scald risk is identified). Cold water should be stored and distributed below 20°C.
- The use of materials that may provide nutrients for microbial growth will be avoided. The Water Fittings and Materials Directory references fittings, materials, and appliances approved for their compliance with the UK legal requirements for plumbing fittings and water using appliances.
- Corrosion, scale deposition and build-up of bio films and sediments will be controlled, and tanks will be lidded.
- Ensure dead legs, which occur when water services leading from the main circulation water system to taps or appliance are used only intermittently and other parts of systems which may provide a reservoir for infection will be identified and where possible eliminated.
- To reduce the risk the Company will remove dead legs/dead ends in pipework, flush out infrequently used outlets (including showerheads and taps) at least weekly and clean and de-scale shower heads and hoses at least quarterly.

Monitoring and Maintenance

- Establish a written scheme of control and logbook to ensure compliance with ACOP L8 and HSG274 monitoring standards.
- Sampling for legionella will 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 will be carried out to give a useful indication of the state of the system.
- Water systems will be routinely cleaned by an effective means and flushed through, before being taken into service and after shutdowns of five or more days.
- Where identified in the risk assessment, plant will be regularly inspected, maintained and disinfected periodically by chlorination or by temporarily raising water temperatures where required.
- Biocides may be used to control microbial growth. Maintenance personnel must wear appropriate protective clothing.

Record Keeping and Communication

- Records will be kept of all maintenance, temperature monitoring and sampling carried out.
- Selection, training and competence of persons carrying out control measures will be recorded in the Legionella logbook. These persons will receive appropriate training and supervision, so they are able to perform their duties competently.
- Relevant information about Legionella risks, control measures, and updates to the written scheme of controls will be communicated as necessary.
- Clear channels of communication will be established to encourage reporting of any concerns or issues related to Legionella management.

Review and Improvement

Records will be kept of all maintenance, temperature monitoring and sampling carried out.

Action in the Event of an Outbreak or Deviation from Control

A contingency plan in case of an outbreak of legionellosis or any high-risk non-conformance will be prepared and detailed within the Water Hygiene Logbook or written scheme of controls. This will include the:

- Identification of people who may have been exposed.
- Involvement of public health authorities.
- Dissemination of information to employees and other interested parties as to the nature of the risks.

In the event of an outbreak or significant deviation from the control scheme the following may be implemented:

- Shut down any processes which can generate and disseminating airborne water droplets and keep them shut down until sampling procedures and any remedial cleaning or other works has been done.
- Take water samples from the system to identify the presence of any bacteria and follow the steps highlighted in the written scheme of controls.

1.24 Alcohol and Drug Abuse

In industry generally there has been a move to greater controls on alcohol and drug abuse and, in keeping with this, the Company has adopted a policy in relation to the consumption of alcohol and drugs. The Company's policy on alcohol is intended to be a positive approach towards maintenance of the highest standards of safety in the workplace. It is also intended to benefit the health and safety of each individual.

Any employee who feels that they may have a problem relating to drugs or alcohol should immediately seek help from the Executive Chairman Responsible for Health and Safety. This information will be treated in the strictest confidence. The Company will endeavour to offer any assistance available at the time.

Likewise, any employee taking prescription or legal non-prescription medication that may affect their ability to undertake their normal scope of work safely, must inform the Executive Chairman Responsible for Health and Safety or their immediate Manager, so that alternative work can be allocated where necessary.

Employees must not attend work whilst under the influence of alcohol or illegal non-prescription drugs. Employees must not consume alcohol or illegal non-prescription drugs on the premises. Employees must not return to work after breaks under the influence of alcohol or illegal non-prescription drugs.

Consumption of alcohol or illegal non-prescription drugs in breach of this policy is deemed a gross misconduct offence and may result in further formal action being taken under the organisations disciplinary procedure. Depending on the circumstances, such action may lead to summary dismissal, that is, dismissal without notice or any compensation.

1.25 Company Smoke-Free Policy

Purpose

This policy has been developed to protect all employees, contractors, customers and visitors from exposure to second-hand smoke and to assist compliance with the Smoke-Free (Premises and Enforcement) Regulations (England) 2006.

Exposure to second-hand smoke, also known as passive smoking, increases the risk of lung cancer, heart disease and other illnesses. Ventilation or separating smokers and non-smokers within the same airspace does not completely stop potentially dangerous exposure.

Policy

It is the policy of the Company that all of its workplaces, including vehicles, are completely smoke free and all employees have a right to work in a smoke free environment. This policy shall be reviewed on an annual basis.

Smoking, including the use of electronic cigarettes, is prohibited throughout the entire workplace, including vehicles, with no exceptions, other than the designated smoking area where applicable. These arrangements will be communicated at induction. This policy applies to all employees, consultants, contractors, customers and visitors.

Implementation

Overall responsibility for policy implementation and review rests with the Executive Chairman of the Company. All employees are obliged to adhere to and facilitate the implementation of the policy.

The Executive Chairman shall inform all existing employees, consultants and contractors of the policy and their role in the implementation and monitoring of the policy. The Executive Chairman, or the person delegated to, will inform, during induction, all new personnel of the No Smoking Policy. Appropriate 'No Smoking' signs will be clearly displayed at the entrances to, and within the premises.

Non-compliance

Local disciplinary procedures will be followed if a member of staff does not comply with this policy. Those who do not comply with the Smoke-Free (Premises and Enforcement) Regulations (England) 2006 are also liable to a fixed penalty fine and possible criminal prosecution.

1.26 Asbestos

In the event of asbestos being found or suspected, work will immediately stop in that area, and the matter will be reported immediately to a Manager, assuming they are not aware of the circumstances at that point. Under normal circumstances the suspected asbestos will not be touched, except to wet it or contain any airborne fibres, and wherever possible keep persons away from it. A specialist company will be approached who will determine the next course of action which should, in the first instance, be to take a sample for analysis. The next course of action will be dependent on this result.

In compliance with the Control of Asbestos at Work Regulations 2012, and subsequent legislation, adequate information, instruction and training is given to employees to enable them to be aware of the health hazards of asbestos; how controls, protective equipment and work methods can reduce these hazards; and the correct use of maintenance of control measures.

Prior to commencing work on projects that may contain asbestos containing materials (ACMs) the following methods of assessment will be deployed:

- A risk assessment shall be carried out on the task and areas of work in the first instance. Dependant on the findings of the risk assessment:
 - Where insufficient information is available to undertake works safely, an R & D (Refurbishment and Demolition) Survey shall be undertaken by competent persons.
 - A subsequent Asbestos Management Plan shall be developed and implemented for the management of any remaining asbestos or ACMs. The plan will be reviewed on an annual basis as a minimum or as advised by the asbestos surveyor.

Any asbestos survey undertaken will be in accordance with HSG 264: Asbestos the Survey Guide and also incorporate the advice and guidance within the Control of Asbestos Regulations 2012. Approved code of practice and guidance and registers of ACMs will be located in the premises.

1.27 Display Screen Equipment

In compliance with the Health and Safety (Display Screen Equipment) Regulations 1992 the Company is to avoid or reduce any health risks through effective safety management. The health and safety of all personnel who may be affected by working with DSE will be considered and suitable control measures introduced. In accordance with the DSE regulations, the following procedures will be followed:

- 'Users' of display screen equipment shall be individually identified by the Manager. They shall ensure that all 'users' have received sufficient instruction to allow them to operate the equipment provided, including the adjustment of screens, keyboards, chairs, footrests, blinds, etc. Particular attention should be given to minimising reflection and glare.
- 'Users' shall be entitled to request an appropriate eye and eyesight test. Where 'special corrective appliances' are needed, a special pair of spectacles for display screen work may be prescribed. Any cost arising from these tests and appliances will be borne by the Company.

The Company accepts that health and safety is its responsibility; however, they also rely on the co-operation of all of its employees to meet this obligation, they consider that every employee has the obligation and right to inform management if they feel that working with DSE may represent a risk to their health.

The Company expects its employees to recognise that they have a duty to take reasonable precautions to avoid ill-health to themselves and others.

The Company will monitor and review the arrangements on DSE on a periodic basis to ensure they remains suitable and sufficient.

1.28 New and Expectant Mothers

The Company will ensure that work activities exposing new and expectant mothers to unacceptable risks are eliminated, so far as is reasonably practicable. Measures to achieve this include preventing exposure to such risks by ensuring:

- Relevant legal standards (dependent on the risk involved) are met.
- Official guidance and good practice are followed.
- Working conditions and/or hours are adjusted if necessary.
- If necessary, new and expectant mothers are removed from hazardous activities, i.e. the employer will provide suitable alternative work or, if this is not possible, will place the employee on paid suspension.

Assessment of Risk

Where hazardous activities cannot be eliminated, risk assessments carried out by a competent person, together with the new and expectant mother, will be undertaken to identify residual risks and to reduce them to the lowest level reasonably practicable. The assessments will take into account the actual risks associated with the work activities and whether these risks are increased, due to any particular problems experienced by a new or expectant mother during her pregnancy or postnatal period. Specifically, the assessment will consider risks associated with exposure to:

- Physical agents.
- Biological agents.
- Chemical agents.

The assessment will also consider working and welfare conditions. Risk assessments relating to new and expectant mothers will be reviewed, and if necessary revised, regularly.

Management Duties

Management must ensure that:

- New and expectant mothers are encouraged to disclose their pregnancy at the earliest possible opportunity.
- The highest level of confidentiality is maintained at all times.
- Risk assessments are carried out for all work activities undertaken by new and expectant mothers and associated records and documentation maintained.
- Necessary control measures identified by the risk assessment are implemented, followed, monitored, reviewed and, if necessary, revised.
- New and expectant mothers are informed of any risks to them and/or their child and the controls measures taken to protect them.
- Any adverse incidents are immediately reported and investigated.
- Appropriate training is provided where suitable alternative work is offered and accepted.
- Provision is made to support new and expectant mothers who need to take time off work for medical reasons associated with their condition.

Duties of New and Expectant Mothers

New and expectant mothers must:

- Inform their general practitioner or midwife of the nature of their work.
- Notify their employer in writing, as soon as possible, if they are pregnant, have just given birth or are breastfeeding.
- Follow any safety arrangements implemented for their protection, including attending training sessions, complying with control measures etc.

- Not act in a manner that adversely affects their own health and safety, that of their child and/or anyone else.
- Report any perceived or real shortcomings in protection to their employer.

Information and Training

Suitable information, instruction and training will be provided to new and expectant mothers to ensure their health and safety. Training needs will be identified and reviewed by a competent person and support given to allow new and expectant mothers to attend any required training sessions. The effectiveness of any training provided will be monitored and training regularly reviewed. Training should also include ensuring that those people responsible for carrying out risk assessments are competent to do so.

1.29 Working Time, Night Working and Shift Working

The Company has taken into consideration the hazards and risks associated with long working hours, nights and shift work and will ensure the health, safety and welfare of the employees who may be affected by these working patterns.

The Company will implement suitable control measures to achieve this, which includes:

- Nominating a competent person to coordinate and managed hours of work and safe shift work activities on site.
- Monitoring alterations to shift-work schedules and/or work conditions.
- Identifying any specific risks and implementing suitable controls to protect the employee whilst they carry out their role during their shift.
- Delivering adequate and sufficient information, instruction and training to enable shift workers to work safely.
- Assessing individual susceptibility to the effects of shift work, such as young/older persons and new/expectant mothers, workers with pre-existing health conditions, temporary workers etc.
- Ensuring shift workers are aware of the emergency procedures, who the appointed Manager is and how to make contact and know how to raise any health and safety concerns in the workplace.
- Ensuring shift handover arrangements are developed and communicated.
- As per The Working Time Regulations 1998, they will ensure there is a minimum of 11 hours between shifts to commute, eat meals, sleep and participate in domestic and social activities.
- Periodically reviewing the effectiveness of the shift working arrangements.

1.30 Homeworkers/Working from Home (WFH)

The Company accepts and understands its responsibility to protect all employees, including those classed as homeworkers or employees who work from home (WFH) whether full time or on a temporary basis. This policy has been developed in line with DSE regulations, Lone Working Regulations and HSE guidance to protect all employees of the Company whilst working from home (WFH).

The Company has implemented the policy in consultation with homeworkers and their immediate Manager to ensure:

- Screening questionnaires/assessments have been completed and documented prior to any employee WFH.
- Information, instruction, and training have been provided, including risks assessments, workstation assessments etc. Any information, instruction, and training will be reviewed at least annually and whenever there are significant changes to the task, situation, location etc.

- Any necessary equipment, including Display Screen Equipment (DSE) is supplied and is safe and suitable for the tasks completed by the homeworker (including guarding, regular maintenance, testing, inspections etc.)
- Any substances provided are assessed and controlled.
- Personal Protective Equipment is supplied where deemed necessary.

It is the duty of the Company to ensure the above is completed and documented. Regular contact will also be made by their Manager to employees to ensure compliance of health and safety and wellbeing is discussed. The Company understands that if contact is poor, employees may feel disconnected, isolated and/or abandoned which may affect stress levels, mental health, and compliance.

It is the duty of the employee to ensure their work does not adversely affect their own, or others (including domestic pets) health, safety and welfare whilst working at home. This may include some simple steps to reduce the risks from display screen work such as:

- Breaking up long spells of DSE work with rest breaks (at least 5 minutes every hour) or changes in activity.
- Avoiding awkward, static postures by regularly changing position.
- Getting up and moving or doing stretching exercises.
- Avoiding eye fatigue by changing focus or blinking from time to time.

If employees are unable to follow training and instruction, the employee must cease the task, and a Manager must be informed immediately.

Employees who WFH are expected to work their contracted hours unless otherwise agreed to by their Manager prior to the agreement. It will be the responsibility of the Company to ensure WFH employees follow legislation on working hours.

1.31 Health Surveillance Procedure

The Executive Chairman has employed the services of an external occupational health provider (OHP) to carry out occupational health surveillance (OHS) of their employees. Details of who the current provider is can be requested from a senior member of management.

The OHP will be informed of the tasks carried out by the employee that requires OHS and their professional advice will be taken on what tests need to be carried out, these may include skin checks, audiometry tests and lung function tests but may include others if deemed necessary.

The OHP will provide the Company with the outcome of the individuals tests as either a pass, fail or requires a retest. If a retest is required, this will be arranged with the OHP.

OHS results will be stored on an individual employee's personal file on the Company's computer system that is backed up. This has all the required protection under the current GDPR regulations.

The results will take the following format:

- The employees name and National Insurance number.
- The substance/s they are exposed to, and when (start date, frequency of use).
- The surveillance test/s that is/are done on them, and the tester.
- The outcome e.g. passed/retest/failed.

The OHP will be asked to provide generalised non-personal results to give an indication if overall health (tested) of the work force has deteriorated since the last tests, to help ascertain if the Company's control methods are being effective.

If an employee was unable to get a pass in a required test, then this would be dealt with in conjunction with the employee, the OHP and the Company's external HR provider to gain the most desirable outcome.

The above data will be kept for a minimum of forty years.

If the employee leaves the Company and requests it, a copy of these records will be passed to them.

Records of ex-employees will be kept or not in line with the legislation at the time.

If the Company is taken over or merged by another Company, the above records will be kept as part of the new Company.

If the Company were to cease trading for any reason the above occupational health records will be offered to the local HSE office (or its successor) for safe keeping.

If the Company were to cease trading for any reason and the local HSE office (or its successor) were unable to take the occupational health records, they would then be offered to the separate individuals ensuring they only received the records related to their own health.

If OHS indicates that an employee has a health condition that requires to be reported under the RIDDOR regulations, details will be passed to the Company's external health and safety consultants who will report on their behalf, keeping senior members of management informed at all stages.

New employees within areas of the Company that require OHS will be given this at the first opportunity and the records kept as above.

Prior to the OHS taking place, a toolbox talk, summarising all the above, will be given to employees who are required to undertake it. Periodic toolbox talks will be given to refresh employees understanding of the importance of carrying out self-checks on skin as instructed by the OHP and the importance of the use of hearing protection and any other PPE used.

The Company is responsible to ensure that the above is carried out and will review this procedure annually.

1.32 Workplace Noise Control

Responsibilities

The Executive Chairman Responsible for Health and Safety will ensure that this procedure is implemented and complied with in all areas of work where a hazard is identified. The Executive Chairman will ensure that the persons under their control are aware of the requirements of this procedure and that they are complied with at all times. They will also ensure that the correct protective equipment is provided as required. All employees will be required to co-operate with the Company in its attempts to reduce or control noise exposure.

Noise Surveys

In accordance with the Control of Noise at Work Regulations 2005, the Company will take all reasonable steps to identify workplace noise levels. The list, once created, will form part of this procedure. Noise surveys will be carried out by competent persons using correct equipment and will be recorded in writing. Tool manufacturers will be consulted to establish individual noise levels. Noise surveys will be reviewed at the following times:

- If work patterns change significantly.
- If machinery is moved or if new machinery is installed.
- At any other time, it is believed that the survey is no longer valid.

Where the exact noise level created on site or by an individual tool cannot be established, the maximum possible protection will be provided until the matter is resolved.

Risk Assessment

Wherever possible, noise assessment for site activities will be included in the risk assessment procedure. Information supplied by manufacturers will be used to determine whether a tool used in a work activity is creating a noise hazard. Site environment noise levels will also form part of the assessment.

Noise Action Levels

The Control of Noise at Work Regulations 2005 established noise action levels above which hearing will be damaged. These are based on dosage averaged over a working day. The action levels are expressed as dB(A):

- First Action Level – 80 dB(A).
- Second Action Level – 85dB(A).

Where the Company operates a permanent workshop, the following actions will apply:

If the First Action Level (80 dB(A)) is reached or exceeded management will:

- Reduce the risk of damage to hearing to the lowest level possible by means other than issuing PPE.
- Inform all persons who may be exposed of the risk to their hearing and of the availability of hearing protection.
- Provide hearing protection at the employee's request.
- Ensure a warning notice is affixed stating that hearing protection is mandatory when the tool is being operated. This rule will apply to all persons who are within 12 metres of the tool.

If the Second Action Level (85dB(A)) is reached or exceeded management will:

- Reduce the exposure to noise to the lowest level possible by means other than issuing PPE.
- Identify all areas where the Second Action Level is reached and post notices at all entrance points to those areas. The notices must warn of the hazards and state that the wearing of hearing protection is mandatory.
- Post notices on all machinery which creates noise at or above the Second Action Level.

- Issue correct hearing protection to all persons who may be exposed, WHICH MUST BE WORN.
- Issue hearing protection to all persons in less noisy areas at their request.
- Implement occupational health surveillance for employees exposed to noise levels above 85dB(A).

Where, as a result of a risk assessment, the general site is deemed to be a noise hazard, management will ensure that all persons who enter or remain on site wear hearing protection at all times.

Personal Protective Equipment

Where the need for PPE is identified as a result of any noise survey or risk assessment, it will be issued as soon as possible. Without prejudice, any hearing protection provided will reduce the amount of noise reaching the ear to an acceptable level – specialist advice will be obtained where necessary.

Training

All employees will receive general noise awareness training as part of the Company's safety programme. However, where hearing protection is issued, specific training in its correct use, storage and maintenance will be given.

1.33 Vibration Control

Under the Control of Vibration Regulations 2005 the Company will look to eliminate or control the exposure to vibration in the workplace to the lowest level that is reasonably practicable (Regulation 6).

Hand arm vibration can be a significant health risk wherever powered hand tools are used for significant lengths of time.

The Company will look to eliminate vibration risk where possible at the planning stage by engineering out the risk at source. Where this is not possible the risk will be reduced to as low as is reasonably practicable with regular monitoring of exposure levels and risk to employees. Health surveillance will be carried out on employees where regular and frequent exposure to vibration risk is evident using the Tier System Questionnaires.

The aim will always be to be PROACTIVE rather than REACTIVE when addressing vibration risk.

The Company will follow good practice controls, currently promoted by the HSE, to help to eliminate or reduce vibration risk in its industry, which are:

Selection of Work Equipment

Tool selection can make a substantial difference to the vibration level, but the tool must be suitable for the task and used correctly. The Company will demonstrate a sound procurement policy for power tools and hand-guided machines considering the following:

- There is no reasonably practicable alternative method with no (or less) vibration exposure.
- Equipment is generally suitable for the job (safety, size, power, efficiency, ergonomics, cost, user acceptability, etc.).
- Reduced vibration designs are selected provided the tools are otherwise suitable.
- Declared vibration emission is not high compared with competing machines of similar capacity to do the job.
- Information on likely vibration emission is available (e.g. from manufacturer, hire company, databases).

- Available information from the manufacturer or elsewhere on control of vibration risks through:
 - Maintenance (e.g. servicing grinders, sharpening drills and chisels).
 - Selection of consumables (abrasive discs, chisels, drills, etc.).
 - Correct operation and operator training (see below).
 - Maximum daily trigger times or maximum daily work done with the tool.

Limiting Exposure Time

Restricting exposure time (“finger-on-trigger” time) will be carried out to ensure exposure remains below the Exposure Limit Value (ELV), even after all reasonably practicable measures to reduce vibration levels are in place.

The Company will determine the maximum times using the exposure points system or supplier’s “traffic lights” tool category. Regular testing and monitoring using HAVI Meters will be carried out to ensure the ELV is not exceeded.

The Company will ensure that the exposure will be reduced to the lowest level that is reasonably practicable (Reg 6(2)), so the ELV will not be used as a target, if a lower exposure is reasonably practicable.

Other Risk Controls

The Company, where possible, will look to control HAV risk by means other than reducing vibration exposure, this will be done by:

- The use of ergonomic aids, such as supporting the weight of the tool which reduce forces applied by operator.
- Ensuring a suitable workplace temperature or provision of warm clothing and gloves.
- Regular breaks from work involving vibration and encourage operators to exercise fingers.

Information, Instruction and Training

The Company will ensure employees at risk from vibration shall have received information on:

- The risks from HAV and how to help reduce them (see above).
- Arrangements for health surveillance and their duty to co-operate.

Managers will look for evidence that tools are being used correctly, as recommended by the manufacturer. This may require operators to receive specified training which will be provided.

Health Surveillance

The Company will provide health surveillance where the Exposure Action Value (EAV) is likely to be exceeded. As a minimum the Company shall:

- Use a periodic health screening questionnaire, both annually and for new employees (TIER system).
- Have arrangements in place for referral of relevant cases to an occupational health provider with HAVS expertise for diagnosis and ongoing monitoring.
- Have arrangements in place to receive medical advice on management of affected employees.
- Have arrangements in place for RIDDOR reporting of HAVS cases.

1.34 Manual Handling

Responsibilities

The Executive Chairman Responsible for Health and Safety will ensure that adequate resources are provided in order that manual handling can be avoided wherever possible and will also provide training to any employee who is required to carry out manual handling operations as part of their work.

Managers are responsible for ensuring that all manual handling operations have been correctly assessed in accordance with risk assessment procedures. They will ensure that manual handling is avoided wherever possible and that employees who are required to carry out manual operation have been correctly trained.

Employees will avoid manual handling wherever possible by using mechanical handling devices provided by the Company. Once trained, employees must use correct handling techniques to avoid injury. Where an employee is injured as a result of a manual handling operation it will be reported in accordance with First Aid and Accident/Incident Reporting procedures.

Manual Handling Risk Assessment

Manual Handling Risk Assessments will be carried out as part of the General Risk Assessment procedure.

For the purpose of risk assessment and identifying precautions, manual handling will be defined as the movement of any item using bodily force including:

- Lifting
- Lowering
- Pulling
- Pushing
- Twisting
- Turning
- Supporting

Handling and Stacking

When handling, employees must use mechanical devices wherever possible. Managers will ensure that mechanical handling devices are available and that materials are correctly stacked so that mechanical devices can be used safely. Where manual handling of material is unavoidable, then it must be ensured that it is carried out by trained employees using the best possible method to avoid injury.

Manual handling methods to avoid injury should include:

- The planning of all manual handling activities.
- The weight of the load being known.
- Heavy items being positioned so that they can be slid rather than lifted.
- Employees not being allowed to manually handle any materials which are too heavy.
- Workstations being designed to avoid the necessity to bend down or twist the torso repeatedly or overreach when carrying out any operation.
- All materials being free from burrs or sharp edges where possible.
- Wherever possible, materials being stacked so as to avoid handling them twice and also avoid creating any additional hazards.
- The use of PPE to avoid hand injuries.

Personal Protective Equipment

Personal Protective Equipment (PPE) will be issued as a result of the findings of the relevant risk assessment, having regard for the hazardous nature of the material being handled.

Manual Handling Training

Manual Handling Training will be provided to all employees who are required to carry out manual handling operations. All training provided will be in accordance with the Company's Safety Training and Information Procedure

1.35 Construction (Design and Management) - Contractor

The Construction (Design and Management) Regulations 2015 places duties on Contractors to ensure co-operation with all parties involved in the project, and that work is managed to ensure a safe site for all parties involved.

Whilst undertaking the role of **Contractor** on site the Company will:

- Ensure that the work is managed in order to ensure the health, safety and welfare of all of its employees, any sub-contractors they may engage and other third parties who may be affected by the work activities.
- Co-operate with the Principal Contractor and other contractors on site co-operating between all parties involved, ensuring that the risks which cannot be eliminated are reduced and properly managed and controlled.
- Consult with employees, appointed contractors and other parties in good time, ensuring all persons under their control have the necessary information at the right time.
- Ensure that when they are on a project where they are the only contractor, they will develop the Construction Phase Plan and will ensure it is communicated to all relevant employees.
- Ensure that before works commence on site, the Principal Contractor has provided suitable and sufficient welfare facilities for the project. Should the Company be the only contractor on site they will ensure welfare provision is available in line with Schedule 2 of the CDM 2015 Regulations.
- Ensure all persons working on site under the Contractors control have a documented site induction before commencing work on site.
- Take the necessary steps towards site security and prevent access by unauthorised third parties and co-operate with the Principal Contractor regarding site security on projects with more than one contractor appointed.
- Ensure that during the planning stage for all projects, and before any works commence on site that the Company will provide suitable and sufficient supervision and resources for all employees and contractors under their control working on site.
- Ensure all employees and contractors under the Contractors control on site have the necessary skills, knowledge, training and experience for the work they are carrying out.
- Ensure that when there is more than one contractor appointed to the project, the Company will co-operate with the Designer or Principal Designer, providing requested information for the safety file in good time.

1.36 Contractors/Sub-contractors

It is the responsibility of the contractor/sub-contractor to ensure that their employees adhere to, and co-operate with, legislative and Company rules in regard to health and safety whilst working for the Company.

It is also the responsibility of the contractors/sub-contractors to ensure that the health, safety and welfare of the Company's staff, visitors and others is not put at risk from their work activities and practices, and that safe systems of work are adhered to at all times.

Where contractors are to carry out work on site, they will be asked to provide evidence of health and safety competence in advance. Copies of risk assessments, COSHH Assessments, method statements, or similar documentation, must be submitted and approved by the Company's responsible person, as confirmation that risks to health and safety are being properly managed. All contractors will report to the prearranged designated person prior to commencing work.

The activities of contractors whilst they are on site will be monitored to ensure that their methods of work are safe, and do not put the safety of the Company's employees at risk.

1.37 Confined Spaces

The Executive Chairman, at the initial risk assessment stage, will identify working environments that are classed as confined spaces under The Confined Space Regulations 1997. The Executive Chairman will assess the risks associated with working in a confined space, identify control measures to reduce risks, and record significant findings on a risk assessment form.

Where possible all such work will be avoided by planning alternative working methods.

Where the risk assessment identifies risks from working in a confined space, a safe system of work will be devised in the form of a method statement, along with a suitable and sufficient rescue plan prior to commencement of work in confined spaces.

The risk assessment will consider all relevant aspects of the work including the duration of the task, the work environment including potential contaminants or hazardous substances, adjacent works, the task to be performed and the capabilities of those performing the task.

Lone working will be avoided when working in confined spaces, for example, by doing the work from the outside.

All relevant personnel are trained in safe working in confined spaces and are given ample opportunity to familiarise themselves with the method statement, rescue plan and use of any specific equipment provided. The Company will ensure adequate competent supervision is provided to ensure that work is controlled and undertaken in accordance with the training, risk assessment and method statement.

1.38 Permits to Work

Works that are identified as being of higher risk will be controlled by the use of "Permit to Work".

Standard procedures are available from the Manager, covering work recognised as having special risks, e.g. excavation, roof work, entry into confined spaces, some electrical work, hot work and work involving asbestos etc.

These permits will be issued by a member of management to ensure safe systems of work are applied by Contractors.

The person receiving the permit must acknowledge receipt of it and must ensure that the specified works is done safely in accordance with any imposed conditions. They must also confirm when the works are completed/closed out and all areas or plant are safe. The permit must then be cancelled by the issuer.

1.39 Transient workers

The Company accepts and understands its responsibility to protect all employees, including those classed as transient workers.

A transient worker, sometimes also known as a peripatetic worker, is defined as someone who works away from their normal work base either for part or all their work. It can also refer to someone who has no fixed work base. Risk assessments for transient workers will consider the type of work they are doing away from the normal work base - this would usually include:

- Working alone.
- Late, evening and night shift work.
- Working in confined spaces.
- Violence towards staff.
- Safe use and maintenance of tools and equipment.
- Working with harmful substances, manual handling, and other health requirements such as health surveillance.
- Provision, use and maintenance of personal protective equipment (PPE).
- First aid and emergencies.

The Company will monitor and review the arrangements on mental health on a periodic basis to ensure they remain suitable and sufficient.

1.40 Safe Working at Height

Responsibilities

Managers will ensure that all persons under their control, including any sub-contractors, have adequate knowledge of this procedure and comply with it at all times. They must also ensure that all operatives under their control are correctly trained in the safe use of any equipment which is used to gain access to work at height. Managers will also have responsibility for correctly identifying work activities and providing all necessary equipment for working safely at height.

Work activities and compliance with this procedure will be monitored by management on an on-going basis. Employees must comply with this procedure and ensure that all access and working areas are used correctly and their integrity is not compromised. Employees must not use any unauthorised access or working platform, improvised systems for access to height is strictly forbidden.

Purpose

This procedure provides a guide for the correct means of safe access which must be used when working at height. It will, when used correctly, prevent the risk of injury in the event of a fall from height or the risk from falling objects and will ensure that suitable and sufficient steps are taken, so far as is reasonably practicable, to prevent persons from gaining unsafe access to any workplace.

The introduction of the Management of Health and Safety at Work Regulations 1999 reinforced the general obligations placed on employers by the Health and Safety at Work Act 1974 to provide a safe place and safe system for work. This obligation has been further enforced by the introduction of the Working at Heights Regulations 2005 (WAH). The procedure detailed below is aimed at implementing the requirements of this legislation.

Scope

This procedure will apply to all Company activities where work at height is undertaken and will include the activities of any sub-contract companies.

Risk Assessment

Work at height will be included in the Company's General Risk Assessment Procedure as appropriate. Where task or site-specific working at height activities are required, these activities will be risk assessed as individual tasks and communicated to employees involved in undertaking the activity. Safe means of access provided will be in accordance with the hierarchy detailed below.

Inspections

All the above forms of access equipment require inspections in accordance with statutory duties. These inspections must be carried out by competent persons and will be recorded in the appropriate inspection register. Inspections will be co-ordinated by the Manager who is responsible for ensuring that all equipment is recalled for inspection and passed as safe. Equipment will be marked, or colour coded to indicate that it is safe to use.

Procedure (General Rules)

- Wherever possible, it is the policy of the Company that working at height will be avoided and other avenues shall be explored and adopted where reasonably practicable.
- Where working at height cannot be avoided, the hierarchy of control will be followed.
- Work at height will be carried out from permanent platforms where they exist.
- Where permanent platforms do not exist, a temporary form of access will be provided to prevent, as far as is reasonably practicable, the risk of falling.
- Work at height on any platform must be carried out from within the confines of the correct access provided.
- All working platforms must be so constructed as to prevent objects from falling off.

- Prevention from falls by using a safety harness with fall arrest system will only be considered as a last resort where no other means of safe access is possible.
- All working platforms must be suitable for the task for which it was constructed. Employees must not under any circumstance step outside the confines of the platform provided.
- At no time should the integrity of any means of access be altered or tampered with by employees. All alterations or any other maintenance will be carried out by approved persons who have been authorised to carry out the work.
- Every scaffold must be securely tied to the structure or building unless it has been constructed to create its own stability.
- The form of safe access selected must be adequate for the range of tasks that are to be carried out from it.
- Only approved access equipment will be used to work at any height above or on floor level. Improvised access will not be permitted. Employees will only be allowed to work on, or operate, access equipment for which they are adequately trained.

Specific Training

Specific training will be required for the following forms of access equipment:

- The construction of any scaffold.
- The erection of any mobile scaffold tower.
- The operation of:
 - Mobile elevated work platforms/cherry pickers
 - Scissor lifts
 - Man baskets
 - Crane baskets

In addition, operatives will be given specific safety awareness training for roof work and the correct use of safety harnesses. This training will be provided by approved training organisations in accordance with statutory requirements.

Ladders

Ladders will be used for temporary access only and must be secured by being tied to the structure to prevent them from falling. All ladders must be inspected and marked as safe (see above).

Fall Arrest Systems

All fall arrest systems must conform to EN361 and must be a full body type with the correct length lanyard attached which conforms to EN355. Fall arrest systems must be secured to an anchorage that is capable of withstanding shock load. All persons who are required to use fall arrest systems must be trained in pre-use inspections, correct fitting and storage. Fall arrest systems must be tested and issued with a test certificate, they must be inspected before use every time.

Safe Access Hierarchy

The list of safe access detailed below is intended as a guide to the order in which the provision of access to height should be considered. When considering the means of access, start with the safest. If that is impractical, consider the next safest option until the most practicable solution has been found.

- Permanent platform.
- Fixed scaffold.
- Mobile elevated work platform.
- Scissor Lift.
- Tower scaffold.
- Safety netting.
- Fall arrest system (only as a last resort).
- Ladder/steps (temporary access only).

1.41 Lifting Equipment and Accessories

The Company will carry out assessments of risks for use and maintenance of lifting equipment and accessories and will ensure that a suitable risk assessment is carried out and all control measures identified are implemented to minimise risk.

To comply with Statutory Regulations (Lifting Operations and Lifting Equipment Regulations 1998), the Company will ensure lifting accessories are inspected every 6 months and lifting equipment every 12 months unless they are used for lifting people, then it is every six months also.

The usage to which lifting equipment and accessories is often subjected to, together with the serious consequences to life and property which may result from any failure, make it extremely important that maximum attention be paid to the correct use and the correct size of chain brothers, slings, etc that are used on site.

The Company will ensure that employees are aware of the correct weight of any object to be lifted, and the correct Safe Working Load (SWL) also known as WLL (Working Load Limit) of the lifting equipment and accessories to be used.

The Company will ensure all lifting operations must have a suitable lift plan in place for the task in hand. The plans must address the foreseeable risks involved in the work and identify the appropriate resources (including people) necessary for safe completion of the job. The lift plan will clearly set out the actions involved at each step of the operation and identify the responsibilities of those involved. The degree of planning and complexity of the plan will vary and will be proportionate to the foreseeable risks involved in the work.

Lifting equipment or accessories will only be used by authorised employees who have been trained in there use and are satisfied with their condition.

All relevant personnel will be given ample opportunity to familiarise themselves with the associated risk assessment, lift plans and safe working loads. Employees will be aware that the angle accessories are used at will affect the load they can lift.

Employees will carry out visual checks of all lifting equipment before use and report defects immediately to their Manager. Damaged or unsatisfactory equipment will not be used and will be quarantined to prevent use by others. Lifting accessories will be stored in a way they will not get damaged.

The Company will monitor and review the arrangements for of lifting equipment and accessories on a periodic basis to ensure they remain suitable and sufficient.

1.42 Driving for Work Purposes

The Company recognises that the use of vehicles on Company business requires additional health and safety measures to protect both employees and third parties.

Processes and procedures will be developed and maintained to reduce the risks associated with driving, as far as reasonably practicable, and to take steps to effectively manage those that cannot be avoided.

The Company will ensure:

- Driving tasks are adequately risk assessed and have a suitable safe system of work in place.
- All vehicles used for work purposes are serviced, maintained and operated in accordance with the manufacturer's guidelines.
- Vehicles used in journeys are matched with the purpose of the journey and that they are suited, as far as reasonably practicable.
- Drivers are in possession of a UK Driving Licence. This must be checked by their Manager every year and endorsements notified to the insurers.
- Suitable insurance cover is in place for both Company vehicles and vehicles used for business use. Full comprehensive insurance must cover the driver and any passengers in the course of such business use. A copy of the insurance certificate will be required before driving on Company business.
- Employees are aware to inform their Manager should they be prescribed any medication which could affect their driving ability. Employees must avoid over-the-counter medications which can adversely affect their driving.
- That effective and robust policies and procedures are in place to manage the hours worked by those driving on Company business. These procedures will ensure that drivers do not drive more than the permitted hours in a 24 period, and that drivers receive sufficient time off and rest breaks over the working week to avoid excessive fatigue and stress. Drivers not covered by statutory regulation of hours will be required to maintain their driving hours within sensible limits.
- Sufficient driver training and education is in place to ensure drivers are equipped to manage the situations and circumstances likely to be involved in journeys undertaken on Company business. Training may include first aid procedures, breakdown procedures and lone working.
- Employees are aware of their duties under Health and Safety, Road Traffic Acts, associated legislation and the Highway Code. This training will include information regarding the consequences of alcohol and drug use, the effects of speed and traffic levels, and the effects of fatigue and stress.
- Drivers have adequate access to technical and personal support in the case of breakdown or accident.
- Additional tools and equipment necessary for the purposes of the journey are provided and maintained.

The Company will ensure that all health and safety policies recognise the special needs of all employees who drive vehicles as part of their employment. The Company will periodically monitor and review the systems and control measures in place to ensure that they are still working effectively.

1.43 Loading and Unloading

The Company understands that the loading and unloading tasks can be dangerous, and that heavy loads, moving or overturning vehicles can all lead to serious injuries or death.

The Company will ensure tasks which involve loading and unloading are adequately risk assessed and have a suitable safe system of work in place for these activities.

To protect employees and others from the risks associated with loading and unloading, the Company will implement suitable control measures to achieve this, which will include:

- To keep clear other traffic, pedestrians and people not involved in loading or unloading.
- To maintain stability, vehicles will be parked on firm level ground, as far as reasonably practicable.
- Ensuring loads are spread as evenly as possible, during both loading and unloading, as uneven loads can make the vehicle or trailer unstable.
- Ensuring loads are secured or arranged so that they do not slide around.
- Ensuring vehicles are never overloaded. Overloaded vehicles can become unstable, difficult to steer or be less able to brake.
- Ensuring tailgates and sideboards are closed when possible. If over-hang cannot be avoided, it must be kept to a minimum. The over-hanging part of the load must be clearly marked.
- Ensuring ramps are used correctly where provided, under a safe system of work. Employees will not use ramps if they have not been trained in their operation or can't secure the ramps to the vehicle or trailer.
- Ensuring that if more than one company is involved (haulier and the recipient), they will agree in advance how loading and unloading will happen.
- Checks are carried out before unloading to make sure loads have not shifted during transit and are not likely to move or fall when restraints are removed.
- Ensuring there are safeguards against drivers accidentally driving away too early.
- Ensuring employees refer to the loading and unloading risk and safe systems of work.

Only trained authorised employees will undertake these tasks.

Overall responsibility for policy implementation and review rests with the Executive Chairman of the Company. All employees are obliged to adhere to and facilitate the implementation of the policy.

The Company expects its employees to recognise that they have a duty to take reasonable precautions to protect themselves and others.

The Company will periodically monitor and review the systems and control measures in place to ensure that they are still working effectively.

1.44 Traffic Management and Yard Safety

The Workplace (Health, Safety and Welfare) Regulations 1992 requires every workplace to be organised so that pedestrians and vehicles can circulate safely. Traffic routes must keep vehicles far enough away from doors or gates used by pedestrians, or from pedestrian routes that lead to or from them. Workplace traffic routes must be maintained and suitable for the people and vehicles using them (pedestrian movement counts as 'traffic').

Under the Traffic Management Act 2004 the Company has a duty to ensure the efficient movement of traffic (pedestrians, cars, cycles, etc) on the highway network that facilitates the site. To facilitate this and in order to manage the traffic impact (vehicles and pedestrians, on or off the highway) the Company will ensure a suitable and sufficient Traffic Management Plan is produced.

The Traffic Management Plan will detail procedures which are in place to minimise the interaction between pedestrians and traffic flows. The Traffic Management Plan will consider the following:

- Identification of the hazards associated with traffic within the workplace.
- Where it is possible to improve the workplace design and layout with marked walkways, crossing points, parking bays and physical barriers.
- Introduction of a one-way system for traffic.
- Installation of fixed mirrors at locations which do not have good visibility.
- Provision of separate vehicle and pedestrian doors wherever possible to provide segregation. Windows on doors can help drivers and pedestrians see whether it is safe for them to approach a door.
- Induction training for employees, contractors and visitors about traffic related hazards which are present on the site.
- Whether visitors who have not been inducted or are unfamiliar with the site and its hazards need to be escorted.
- Sensible speed limits and clearly displayed speed limit signage.
- The need to display warning signage for pedestrians and other visiting drivers such as 'Forklift trucks operating in this area' etc. Ensuring signage identifying the whereabouts of the site office and instructions for delivery drivers and is clearly visible from the entrance to site.
- The need to avoid reversing operations where possible. If unavoidable, the Company will ensure that suitable arrangements are in place for allowing vehicles to reverse safely with the aid of a trained banksman.
- The requirement and provision of personal protective equipment, such as high visibility vests and safety boots, for employees and visitors who are required to interact in areas with a traffic flow.

The Company will monitor and review the traffic arrangements on a periodic basis to ensure they remain suitable and sufficient.

Environmental Policy Statement

1. Staircraft Group Ltd (the Company) recognises its environmental duties under the Environmental Protection act 1990 and the Waste (England and Wales) (Amendment) Regulations 2012. The Executive Chairman Responsible for Health, Safety and Environmental issues, Andy Hamilton recognises that they have a responsibility to take an environmentally (and socially) responsible approach both to existing activities and to possible new developments.
2. The Company, so far as is reasonably practicable, proposes to pay particular attention to:
 - a) Minimise disturbance to the local and global environment, and to the local communities and wildlife.
 - b) Follow the waste management hierarchy as outlined in the Waste (England and Wales) (Amendment) Regulations 2012. The Company will follow the hierarchy outlined below:
 - (1) Prevention
 - (2) Preparing for re-use
 - (3) Recycling
 - (4) Recovery
 - (5) Disposal
 - c) Minimise use of energy and raw materials and to adhere to the principles of sustainability.
 - d) Consider the environment in the design of processes and products and the maintenance of equipment.
 - e) Provide information on the use and final disposal of products.
 - f) Ensure that all employees and suppliers are adequately informed about the Company's environmental policy.
 - g) Minimise the use of product related materials and services such as packaging or transport.
3. In order that the Company can achieve those objectives, it is important that employees recognise their duty, whilst at work, to take reasonable care of the environment. Employees should also co-operate fully with the Company or anyone else concerned, to ensure that their legal and moral obligations are performed or complied with.

Signed: *A. Hamilton*

Andy Hamilton
Executive Chairman Responsible for Health, Safety and Environmental issues
September 2025

