



## Health and Safety Policy

The Company has responsibilities under Health and Safety legislation towards:

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

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.
- Cooperate 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 supervisor 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.
- If involved in an accident resulting in, or which may have resulted in, injury report the details to their immediate supervisor as soon as possible, and in all cases before the end of the shift on which the incident occurs.
- Arrange for any spillage of dangerous substance 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.

### Director Responsible for Health and Safety

The Director who has overall responsibility for Health & 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 Director 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 Director 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 complies 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 is 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 procedure (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.
- The following statutory notices are displayed:
  - A signed copy of the Health and Safety Policy Statement of Intent
  - Employers liability insurance certificate
  - Health and Safety Law poster
  - First Aid (notifying the names and locations of the First-Aiders where applicable)
  - Fire exit signs (with directional signs and running person where applicable)
- The following documentation is held on site:
  - Accident incident book and logged correctly (B1570)
- Health and Safety improvement suggestions received from staff are given due consideration.

### **Company Directors - General Responsibilities for Health and Safety**

The Directors are 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. Director/s 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. Director/s will ensure regular review of the policy and management system in order to maintain high standards of H&S within the company.



It will be the Directors responsibility to ensure that:

- Systems are in place to review and up-date 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.
- Ensuring that appropriate financial requirements for the Company's Health & Safety function are contained within the legal resources.
- Ensuring that the legal implications of relevant legislation are raised with. and understood by Directors.
- Ensuring adequate resources are made available to allow the effective implementation of the Company's Health and Safety policy.

### Company Employees

To include all employees:

Responsible for:

- Health & Safety on a day to day basis - implementation of Health and Safety procedures. precautions and controls.
- Undertaking Risk Assessments within their department; (Give Guidance).
- Ensuring and encouraging the highest possible standards of Health & 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 fire training sessions.
- Carrying out hazard spotting checks of their department.
- Assessing and meeting Health & Safety training needs.
- Provide training of H&S within the work environment where needed
- Give access to all relevant information regarding H&S to ensure all employees understand their responsibilities.



The above responsibilities will be implemented by Nueco Group Ltd safety advisors. For all Health and Safety matters, as defined by the Management of Health and Safety at Work Regulations 7999.

### Safety adviser

As required by Regulation 7 of 'The Management of Health and Safety at Work Regulations', Metis Consulting Ltd have been appointed to advise and assist all related Health, Safety and Welfare issues related specifically to our business undertakings. Metis Consulting Ltd will be responsible directly to the Directors and will also maintain a close relationship with all other employees.

Specifically, they will perform the following functions:

- Advise on the application and maintenance of our 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 the Directors on any related Safety matters.
- Monitor the Company's Health and Safety status by regular visits to site and ensuring our compliance with current legislation and our Company policy and standards.
- Maintain a close liaison with the Health and Safety Executive Inspectors and other appropriate organisations and departments relevant to our undertaking.
- Advise Company Directors on training requirements for employees ensuring they are competent to carry out detailed tasks within the parameters of current Safety legislation.
- Carry out regular site visits and advise management on the implementation arrangements of the Health and Safety policy.
- Advise on the training requirements for employees, especially new starters, specifically formal Safety awareness training and site induction training.

### Company Competent Person

Metis Consulting Ltd has been appointed to the role of Company Competent Person and is responsible for advice on overall strategies for Health, Safety and Welfare within the Company.

At unit level. they will provide advice to the Company as required in particular:

- Advice on interpretation of legal requirements
- Assistance with strategy for implementation of the policy
- Provide investigations of serious accidents
- Revise the policy in the light of experience or legal change
- Advice upon the visit of an Enforcement Officer



## Arrangements

### 1. 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 our work activities.

Equally important is the need for constant alertness by the Directors Responsible for Health and Safety and employees in identifying and eliminating potential hazards wherever possible.

It is our primary objective that in conducting our 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 our 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 that we meet our legal requirements.

#### 1.1 Consultation with Employees

A requirement of the Health and Safety (Consultation with Employees) regulations is for us to consult with our employees in all matters relating to health and safety.

As a Company, the Company will convene regular meetings, to discuss all relevant issues relating to health and safety.



In particular, we 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 meetings will be formal, and minutes of the meeting will be documented and displayed on Company health and safety notice boards.

## 2. Arrangements for Implementing Policy

### 2.1 Communication with Employees

We 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 our external health and safety advisors. Employees will also be briefed by their supervisor in the form of toolbox talks as required by the management team or advised by our 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 or who can read the same language. Where necessary we 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 wellbeing 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.

### 2.2 Fire

A written Risk Assessment in accordance with the Regulatory Reform (Fire Safety) Order 2005 (FSO) will be undertaken and kept up to date. The control measures identified will be issued to relevant employees. Training and information will be given as necessary.

Detailed procedures for evacuations including exit routes and information on good practice are held, and available on request to any member of staff. Equipment checks and evacuation drills will be held at regular intervals. Fire Warden will be appointed, and another member of staff will act as an evacuation "Roll Caller".



Staff will be trained in fire Safety and the use of fire equipment. They will also be briefed on the role of individuals and the action to take in the event of a fire or other emergency.

### 2.3 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/Risk
- Fire
- Machinery & Equipment including Forklift Trucks, Power & Hand Tools

### 2.4 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 Director Responsible for Health and Safety will maintain a register of certificated First Aiders and will ensure that a minimum level of cover is provided at all times.

### 2.5 Accident Procedure

Details of all accidents will be recorded in the Accident Book, and where appropriate investigated by Nueco Group Limited. 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 (see 2.6).

### 2.6 Statutory Notification of Accidents/ Dangerous Occurrences

When a specified injury or dangerous occurrence has occurred, the HSE will be notified immediately and the online notification form will be completed and sent within 10 days of notification. Others to be notified as soon as possible are, Directors, 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 7 consecutive days, the HSE Incident Control Centre must be notified within 15 working days from the day of the accident.

Please note it will still be a requirement to record all over 3 day accidents just no longer report them to the HSE. The entry into the Company accident book of over 3 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 Metis Consulting 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 on the following page:

#### **Accidents which require immediate reporting to the local H.S.E.**

#### **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 injuries').

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 must 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).
- Scalpings (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 must 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).

## 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](http://www.hse.gov.uk/riddor)

### Reportable Occupational Diseases

Employers and self-employed people must report diagnoses of certain occupational diseases, where these are likely to have been caused or made worse by their work. These diseases include (regulations 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

### Exemptions

In general, reports are not required (regulation 14) for deaths and injuries that result from:

- Medical or dental treatment, or an examination carried out by, or under the supervision of, a doctor or registered dentist.
- The duties carried out by a member of the armed forces while on duty.
- Road traffic accidents, unless the accident involved the loading or unloading of a vehicle.
- Work alongside the road, e.g. construction or maintenance work.
- The escape of a substance being conveyed by the vehicle; or a train.

### Recording Requirements

Records of incidents covered by RIDDOR are also important. They ensure that we (the Company) have collect sufficient information to allow us 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 causing 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). We do 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.

When requested we produce RIDDOR & accident book entries records when asked by HSE, local authority or any other statutory inspectors.

## 2.7 Equipment and 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 adequate 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.

## 2.8 Personal Protective Equipment (PPE)

**Responsibilities:** Directors will be responsible for ensuring that only PPE to the correct standards has been issued and used.

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 Regulations 1992, an Assessment of the PPE requirements of each employee 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 will be used to the correct BS or EN standard, equipment which is not CE marked will not be used.

The Managing Director in liaison with the Company Safety Advisers 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 supervisor 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 must be replaced before the operative 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 individual's preference. Once issued PPE must be worn. It will not be left to the operative's discretion.

**Damage/ Misuse:** It will be the responsibility of the employee to report any faulty or damaged Safety equipment to their Director. It must then be exchanged as soon as possible.

Employees must 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 Operatives can be correctly equipped with Safety equipment at short notice, a reserve stock will be held by the office.

## 2.9 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.

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. Employee's 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 timescale laid down in the Regulations.

## 2.10 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 1999. 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 Directors Responsible for Health & Safety will ensure at the planning stage that the requirements for welfare provision are suitably assessed and provisions made before work commences on site.

## 2.11 Control of Substances Hazardous to Health (COSHH)

The requirements of the COSHH Regulations 2004 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 Directors will be responsible for ensuring that this section is implemented and that all employees are given adequate information about any substances which are to be used.

Directors must ensure that the significant findings of any COSHH Assessment, including the Safety precautions to be adopted, are communicated to all operatives 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 are to cease use immediately and contact a Director.

**Hazardous Substances Register:** The Directors 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 must 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 operative
- In any case every 12 months

Any review must 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 the Managing Director 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 Nueco Group Ltd Safety Advisors shall be sought where applicable.

**Safety Precaution Advice:** Any Safety Precautions recommended as a consequence of a COSHH Assessment must be adhered to at all times while the substance is in use.

**Health Surveillance:** 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 sand or chemical dry granules, 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. The Director is to 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.

## 2.12 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 regards 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 companies 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 person responsible, 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 or work are safe, and do not put the Safety of the Company's employees at Risk.

## 2.12 Drugs and Alcohol

In industry generally there has been a move to greater controls and in keeping with this the Company has adapted 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 & Safety if each individual.

Any employee who feels that they may have a problem relating to drugs or alcohol should immediately seek help from the Director 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 medication that may affect their ability to undertake their normal scope of work safely must inform the Director responsible for Health & Safety or the immediate supervisor so that alternative work will can be allocated where necessary.

Employees must not attend work whilst under the influence of alcohol or non-prescriptive drugs.

Employees must not consume alcohol or non-prescriptive drugs on the premises.

Employees must not return to work after breaks under the influence of alcohol or non-prescriptive drugs.



## CONSUMPTION OF ALCOHOL IN BREACH OF THIS POLICY IS A DISMISSABLE OFFENCE.

### 2.14 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 our 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. This policy applies to all Employees, Consultants, Contractors, Customers or Members and Visitors.

#### Implementation

Overall responsibility for policy implementation and review rests with the Managing Director of the Company. All staff are obliged to adhere to and facilitate the Implementation of the Policy.

The Managing Director shall inform all existing Employees, Consultants and Contractors of the policy and their role in the implementation and monitoring of the policy. The Managing Director or the person Delegated to must 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 should 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.

### 2.15 Working at Height

The Company recognises and accepts its responsibility under the Work at Height Regulations 2005 and shall as far as reasonably practicable ensure:

- All work at height is avoided where possible.
- All work at height is properly planned and organised.
- All work at height takes account of weather conditions that could endanger health and safety.





- Those involved in work at height are trained and competent.
- The place where work at height is done is safe.
- Equipment for work at height is appropriately inspected.
- The risk from fragile surfaces are properly controlled.
- The risks from falling objects are properly controlled.
- Take account of the risk assessment carried out under regulation 3 of the Management of Health and Safety at Work Regulations 1999.
- Suitable rescue procedures are in place for all working at height activities, employees are trained to use rescue equipment and rescue procedures.

See the Company Full Work at Height Policy for more information on the Company's safe working procedures for work at height activities.

## 2.16 Workplace Noise Control/ Vibration Control

**Responsibilities:** The Director Responsible for Health and Safety will ensure that this procedure is implemented and complied with in all areas of work where a noise or vibration hazard is identified.

The Director must 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 or vibration exposure.

**Noise Surveys:** In accordance with the Control of Noise at Work Regulations, 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 have 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:

The Directors will:

- Reduce the risk of damage to hearing to the lowest possible by other means 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.
- 

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

The Directors will:

- Reduce the exposure to noise to the lowest level possible 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).

All site equipment having a noise level at or above the First Action Level will have a warning notice 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.

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

**Vibration:** Certain types of work equipment when in use can cause Vibration White Finger (VWF). Directors shall reduce exposure by use of anti-vibration equipment or rotation of personnel with regular surveillance. Tooling will be selected that has the lowest level of vibration possible and worn or damaged tooling will be replaced as soon as possible to prevent exposure to potentially hazardous levels of vibration.



**Personal Protective Equipment:** Where PPE is identified as a result of any noise or vibration survey or risk assessment it will be issued as soon as possible. Without prejudice any hearing protection provided must reduce the amount of noise reaching the ear to an acceptable level, this may need specialist advice.

**Training:** All employees will receive general noise and vibration 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.

## 2.17 Stress

The Company is committed to protecting the health, safety and welfare of its staff and recognises that workplace stress is a health & 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 well-being are affected by stress.
- Manage and control factors which might result in excessive or sustained levels of stress.
- Increase awareness of stress and its causes and methods to combat it.
- Assist staff in managing stress in themselves and others.

As far as reasonably practicable the Company will:

- Provide managers 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 support through the Employee Assistance Programme.
- Provide suitable training such as time management, assertiveness and dealing with difficult/sensitive situations.
- Monitor the occurrence and levels of absence associated with stress.

## 2.18 Asbestos

In the event of asbestos being found or is suspected, work will immediately stop in that area and the matter should be reported immediately to the Site Foreman, assuming he is not aware of the circumstances at that point. Under normal circumstances the suspected asbestos should not be touched, except to wet it, contain any airborne fibres, wherever possible and keep persons away from it. A Specialist Company should be approached who will determine the next course of action which should, in the first place, to take a sample for analysis. Dependent on this result will depend on the next course of action.



In compliance with the Control of Asbestos at Work Regulations 207 2, 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 area of works in the first instance, and dependant on the findings of the risk assessment.
- Where insufficient information is available to undertake works safely. an R & D (Refurbishment & 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, obtaining client knowledge and registers of ACMs located in the premises.

## 2.19 Display Screen Equipment

In accordance with the Health and Safety (Display Screen Equipment) Regulations 1992, the following procedures will be followed:

‘Users’ of display screen equipment shall be individually identified by the Office Manager. The Office Manager 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.

## 2.20 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.

We will undertake an annual training needs analysis for all our 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 managing director is committed to providing sufficient funds and resources to ensure all necessary training is provided to employees.



## Managerial Training

The Directors recognise, 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

It is essential that Safety Advisor's training needs to be regularly appraised. He will be encouraged to seek such professional qualifications as befits the Company's needs.

### 2.21 Health Surveillance

**Responsibility:** The Director Responsible for Health and Safety shall ensure that health surveillance is provided where necessary for all employees and records maintained in line with data protection and health and safety legislation. Where necessary reasonable adjustments will be made for employees with any existing health conditions that may be aggravated or made worse by any work activities undertaken by the Company. In order to monitor the health of all employees an annual medical questionnaire will be issued and reviewed and action taken in the event that an employee or employees have recorded any health issue or an increase/worsening of an existing condition due to the work environment.

**Procedure:** Where known occupational health risks exist within the companies scope of works a suitable and sufficient risk assessment and safe system of work will be developed for the work activity and control measures implemented to ensure the health, safety and welfare of all employees affected. Where health surveillance is required this will be outlined in the risk assessment and safe system of work and communicated to affected employees.

Directors shall, where work activities could cause health problems, regularly review the work activities and where possible implement engineering controls or substitute existing substances for less hazardous ones and so reduce to occupational risk to employees and other third parties affected by the Company's scope of works.

Should any person have a health problem which could affect their health, safety and welfare while at the workplace, they shall inform their immediate Supervisor.

### 2.22 Manual Handling

#### Responsibilities

The Director 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 operative who is required to carry out manual handling operations as part of their work.

Supervisors 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 operatives who are required to carry out manual operation have been correctly trained. Operatives must avoid manual handling wherever possible by using mechanical handling devices provided by the Company. Once trained, operatives must use correct handling techniques to avoid injury.



Where an operative is injured as a result of a manual handling operation it must 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, operatives must use mechanical devices wherever possible. Supervisors must 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 operatives using the best possible method to avoid injury.

Manual handling methods to avoid injury should include:

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



## Personal Protective Equipment

Personal protective equipment 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 operatives who are required to carry out manual handling operations. All training provided will be in accordance with the Company Safety Training and Information procedure.

### 2.23 Construction (Design and Management) Regulations 2015

The Construction (Design and Management) Regulations 2015 places duties on contractors to ensure we cooperate with all parties involved in the project and that we manage our work to ensure a safe site for all parties involved.

Whilst undertaking the role of Contractor on site we will ensure the following:

- We manage our work in order to ensure the health, safety and welfare of all our employees, any subcontractors we may engage and other third parties who may be affected by our work activities.
- Cooperate with other duty holders. We will cooperate with the principal contractor and other contractors on site to ensure cooperation between all parties involved, ensuring that the risks which cannot be eliminated are reduced and properly managed and controlled.
- Consult with employees our appointed contractors and other parties in good time ensuring all persons under our control have the necessary information at the right time.
- On a project where we are the only contractor, we will develop the construction phase plan for the project and ensure it is communicated to all relevant employees.
- Before works commence on site we will ensure the principle contractor has provided suitable and sufficient welfare facilities for the project. Where we are the only contractor on site, we will ensure welfare provision is available in line with schedule 2 of the CDM 2015 Regulations.
- Ensure all persons working on site under our control have a documented site induction before commencing work on site.
- Take the necessary steps to ensure site security and prevent access by unauthorised third parties and cooperate with the principal contractor regarding site security on projects with more than one contractor appointed.
- During the planning stage for all projects and before any works commence on site, we will ensure that we provide suitable and sufficient supervision and resources for all employees and contractors under our control working on site.
- We will ensure all employees and contractors under our control on site have the necessary skills, knowledge, training and experience for the work they are carrying out.
- Where more than one contractor has been appointed, we will cooperate with the designer or principal designer providing requested information for the safety file in good time.



Whilst undertaking the role of **Principal Contractor** we will ensure the following:

- Ensure we have the have the right skills, knowledge, training and experience necessary before accepting the role of principal contractor.
- We will liaise and co-operate with the principal designer to ensure information is provided to assist when considering health and safety in their design at both the pre-construction phase and design work during construction.
- Ensure the client is aware of their duties and liaise with the client regarding their client brief and expectations for the project.
- Request the necessary preconstruction information from the client to enable us to develop the construction phase plan for the project.
- Manage the construction phase of the project ensuring health and safety standards are maintained and risks eliminated where possible and where risks cannot be eliminated suitable control measures are implemented on site.
- Ensure all site operatives have a documented site induction before commencing work on site.
- During site set up ensure suitable and sufficient site security arrangements are established before allowing work to commence on site and ensure the site is secure at the end of each working day.
- Take steps to ensure our employees and appointed contractors have the necessary skills. knowledge. training and experience for the work they are carrying out.
- Provide suitable and sufficient site supervision and management depending on the size and complexity of the scope of works to be undertaken.
- Engage with workers and contractors on site ensuring effective communication of information and that any health and safety ideas or concerns are given due consideration.
- Effectively monitor health and safety risk on site ensuring it is reduced to the lowest level possible where possible and where the risk cannot be eliminated control measures are implemented and communicated to affected parties.
- Provide the necessary information to the principal designer so the health and safety file can be completed in good time. In projects where the principal designer appointment finishes before the end of the construction phase, we will take on the responsibility for the file and for handing it over to the client.

### **Domestic Clients**

Our duties remain the same as those for a commercial client when working for a domestic client.

### **Design Input**

Whilst undertaking the role of Contractor or Principal Contractor we may specify materials to be used and have a design input during the preconstruction phase and construction phase of the project, when this is the case we will ensure the following:





- Ensure effective communication between the Principal Designer and other parties involved.

Provide the Principal Designer with:

- Information for inclusion in the safety file when requested.
- Information relating to our designs. including any unusual remaining risks and key assumptions made.
- Details of significant risks that are part of our design.

Information for other Designers:

- Design loads, where we are responsible for the selection of plant. Equipment, materials or civil and construction design.
- Design parameters, where they could affect how others design their elements of the work.
- Key principles used in our design.
- Design drawings relevant to other designs.
- Specifications, that may inform their designs.
- Information obtained to aid our design that could be useful to others.

Provide the following information for contractors & principal contractors:

- Relevant assumptions our design makes.
- Any survey or report obtained as part of our appointment that could be useful to others in the management of health and safety.

## 2.24 Driving Company Vehicles

When using a vehicle supplied by the Company all employees must conform to all requirements of the Road Traffic Acts, associated legislation and the Highway Code.

Where employees are driving in the course of their employment or driving vehicles supplied by the Company they must:

- Ensure that the vehicle is serviced, maintained and operated in accordance with the manufacturer's guidelines.
- Be in possession of a UK driving licence. This must be checked by your manager every year and endorsements notified to the insurers (for Company vehicles and when driving your own vehicle on Company business).
- Ask their GP if any prescribed medicine will affect their driving ability; if so, employees must refrain from driving and inform their immediate supervisor.
- Employees are not permitted to operate a hand-held mobile phone whilst driving Company vehicles, the punishment for such an offence is a £100 fine and three penalty points on your driving license. Therefore do not operate your hand-held mobile phone whilst driving; it is dangerous.



- Wear glasses or lenses if prescribed for this activity.
- Never drive Company vehicles under the influence of alcohol or illegal drugs or perception medication which may affect your ability to drive safely.

Employees driving vehicles should avoid over-the-counter medications such as anti-depressants, antihistamines for hay fever, nettle rash, asthmas, eczema or travel sickness preparations or cough and cold remedies, which can adversely affect driving.

Before setting off:

- Check tyre pressures and visual condition, tread depth (cuts or obvious damage, especially to the tyre walls) and general vehicle condition.
- Check seat belts - working and in good order and worn by all vehicle occupants where provided.
- Adjust driving techniques to suit weather and traffic conditions.
- Ensure you have read through the driving Company vehicles section in employees' handbook.

On arrival to destination or site:

- Beware of un-metalled roads and soft ground on sites; where possible park off site (not in an area causing an obstruction to highway, site traffic or the emergency services).
- Observe all traffic management arrangements in place for the site.
- Make sure the vehicle is secured and any valuable items stored out of site such as satellite navigation systems and mobile phones.

When driving on business on behalf of the Company and the vehicle is not supplied by the Company you must have full comprehensive insurance cover to 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.

“All our company policies are reviewed quarterly to ensure that Nueco Group Limited remains knowledgeable, learned and abreast with the latest industry legislation. We outsource council from recognised industry professionals to ensure the highest standard of consultation is received. I personally communicate each policy to all of our members to ensure anyone representing Nueco Group Limited are well briefed, attentive and working safely.”

*Tom Gibbons*

**Tom Gibbons**

**Managing Director**

*Rev. - March 2021*

*For and on behalf of Nueco Group Limited*