

Health & Safety Policy



1 Policy Statement

The company is committed to delivering a safe working environment by compliance with the applicable national health and safety legislation and by implementing safe practices in the workplace.

Key Aims of the Policy:

- To minimise the number of occupational injuries and illnesses.
- Lay out the key duties of the Management, Supervisors and individual employees in ensuring people work safely, and safe practices are enforced.
- To implement the key areas of health and safety law: in particular the Health & Safety at Work Act (1974) and the Management of Health & Safety at Work Regulations (1999).

Key Duties of Management:

- It is the duty of the management and supervisors to promote and support the principals of this policy and lead by example in complying with the relevant legislation.
- It is the duty of management to provide the necessary resource in terms of time, personnel and equipment in order to implement this policy.
- It is their duty to consult and involve employees in matters of health and safety, and raise awareness of potential hazards by training and instruction.

Objectives for Achieving Our Aims:

- To maintain the low accident rate at the company.
- Provide training to all employees at the company on an annual basis.
- Maintain sickness absence below 3% threshold.
- Implement workplace audits on a monthly basis.

Signed: 

Date:30/11/2011

Managing Director

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2 Organisation of Health & safety at Work

- The Managing Director is ultimately responsible for the implementation of the health and safety policy, but responsibility for the general direction of health and safety is delegated to the Director of Health & Safety.
- The general administration of Health & safety at work is the responsibility of the Director of Health & Safety and the Health & Safety Officer.
- Further support and direction will be provided by the company's Health & Safety Team. This will include an audit every year dependent on the number of issues identified, highlighting areas to be tackled in improving compliances to the laws and regulations of the relevant countries
- The current duty holders shall be detailed in a prominently displayed notice

Responsibilities

Managing Director

- Responsible for ensuring the Management Team and the Director of Health & Safety deal with health & safety matters that arise.

Manager with overall charge of health & safety

- Responsible for writing policies and implementing procedures in consultation with subordinates and other Managers where necessary.
- Responsible for ensuring the health & safety policies are communicated to all employees and enforced throughout the facility.
- Ensure subordinates are trained appropriately to be able to implement the policy and procedures.

Officer/Member of staff with overall responsibility for health & safety

- Director of Health & Safety is responsible for writing policies and procedures.
- Responsible for ensuring the health & safety policies are communicated to all employees and enforced throughout the facility.
- Keep up to date with current legislation, common law and code of Practice relevant to the facility and its processes.
- Maintain records on assessments and findings and communicate these to all employees as necessary.

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- Monitor trends in the facility's safety performance and accident rate on at least a quarterly basis: Communicate findings to the H&S Team in a timely manner.
- Initiate actions to reverse unwelcome trends in accident statistics.
- Ensuring all incidents resulting in a full day of lost time (excluding the day of the accident) are investigated thoroughly and records maintained.
- In addition to the above preparing incident reports for the necessary organisations as dictated by law or the H&S Team. E.g. RIDDOR requirements, Insurance Company notifications, actions by the Health & Safety Executive.

Other Managers

- Fully support the Health & Safety Policy and contribute to it where relevant.
- Ensure subordinates are instructed so that they fully implement the Health & safety Policy and Procedures and that their compliance with instructions is enforced.

Manager in overall charge of the Maintenance of the facility

- As well as above ensure records are maintained for the testing and inspection of any equipment and machinery required by law. E.g. forklifts, cranes and slings.
- Ensure that items identified by the Director of Health & Safety or any other employee are appropriately scheduled in for dealing with relative to their level of priority. E.g. Guard modifications, repositioning of equipment, marking and signage in the facility.

Employees

- All employees are responsible for making themselves aware of the Health & Safety Policy and ensuring they comply with any procedures or notices relevant to their work.
- Taking due care for the health & safety of themselves and their fellow employees.
- Refrain from any behaviour that could cause injury to themselves or others.
- Wearing and using appropriate personal protective equipment (PPE) as required.
- Ensuring PPE is looked after and not abused or lost, but also that it is changed due to general wear and tear.
- Co-operate with the Company in the implementation and observation of all practices required by law, and the Company's policies.

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- Report all accidents and injuries in the Accident Book (located in the First Aid Room). Report also any “Near Misses” in the Accident Book that is significant, incidents that could cause injury but did not on this occasion simply by chance.
- Report any failings of equipment to their immediate supervisor or maintenance employees, which could cause injury to others if not corrected. E.g. Guard breakage failure of a safety device, a colleague ignoring procedures, important notices becoming damaged.

Auditing, Inspecting and Measuring

- The Health & Safety along with Safety Representatives and Management shall carry out routine and random audits of compliance with health & safety policy requirements and requirements of the law.
- The audits could take the form of “housekeeping” scoring carried out on a random basis of specific areas of the facility.
- There will also be a full audit of the facility on a quarterly basis. This audit will be carried out by the Director of Health & Safety/Health & Safety Officer.

Schedule of Inspections

- The plant and its equipment will be inspected regularly in order to ensure the equipment is safe and in good order for its intended use.
- Responsibility for the carrying out of inspections and maintenance of records are to be arranged, along with the time scales of inspection.
- Where required by law certain inspections must be carried out by a competent person(s).

3 Arrangements for Health & Safety

First Aid Provision

- The company provides First Aid supplies on the premises at points indicated by signage and on the building plan.
- First Aid supplies are monitored by first aiders and replenished by the Health & Safety Officer.

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- The company will endeavour to provide trained First Aiders, sufficient to meet the requirements of the business. The company will aim to provide First aid coverage across different departments and shifts where needed.
- First Aiders on the premises at the time of an accident must be released from their other duties immediately that an incident occurs.
- First aid supplies must be issued by the trained First Aiders only and not by other employees.
- The First Aiders are collectively responsible for ensuring the Accident Reports are completed properly and any supplies that are used are recorded. Reports must be treated with confidentiality and submitted in sealed envelopes to the Health & Safety Officer.
- The Accident Report **MUST BE COMPLETED ON THE SAME DAY** of the Accident.
- Those trained as First Aiders will be notified to rest of the workforce by notices, badges or introduced during the induction process.
- First Aiders must undergo refresher training every 3 years and CPR refresher training is recommended every 12 months.

Accident Reporting and Investigation

- All accidents resulting in even minor injuries should be reported in the Accident Book.

Near Misses

- Where an incident occurs that could have resulted in serious injury, Production Supervision shall be responsible for making a statement briefly describing the incident, including times, dates, locations, equipment involved and witnesses. This must then be forwarded to the Health & Safety Officer/Director of Health & Safety

Minor Incidents/Near Miss Trends

- The Health & Safety Officer/Technician will review the Accident Book and any near miss reports on a weekly basis to look for any adverse incident trends occurring. Appropriate action will be discussed with Managers and/or Engineers in order to reverse the trends.

Lost Time and Serious Accidents

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- All accidents that result in an employee going home for the rest of the day/shift shall be investigated by Director of Health & Safety/Team Leader, and the findings and any recommendations recorded.
- Where the time lost or the seriousness of the incident requires it to be reported to the Health & Safety Executive (Reporting of Injuries, Diseases and Dangerous Occurrences regulations. 1995 [RIDDOR]), the necessary report will be completed by the H&S Officer/ Director of Health & Safety and filed with the accident book record.
- Any report made to the HSE must be accompanied by notification to the Company's acting Insurance Broker in order that the personal liability insurer is kept informed.
- The reports must be maintained securely in hard copy for a period of 40 years.

Accident Prevention and Management of Risk

- The company shall carry out Risk Assessment in order to identify potential causes of injury or illness and assess the likelihood of injury in order to prioritise control measures.
- Assessments shall be carried out to a broad schedule detailed below but will also need to take place where new processes are introduced or there are significant changes to existing processes. The time scales for the implementation of control measures shall depend on the calculated risk level identified.

Risk Level Identified	Recommended Time Scale for Implementation of Control
Very high	Immediate Even if this means halting process
High	0 – 2 Days
Medium	Within 30 Days
Low	Within 90 Days
Very Low	Within 6 Months

In any case risk assessments shall be reviewed every 3 years to ensure the findings are current.

Type of Assessment	Details
Area risk Assessment	Carried out to give a general overview of the operation. E.g. a general risk assessment of a department/office or shop floor area. It identifies the broad type of hazards in the area.
Process Risk Assessment	Certain processes containing a number of hazards may be identified in a general area risk assessment
Machine Risk Assessment	The assessment focuses on a particular machine and its operation.

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COSHH Assessment	The assessment focuses on a particular process and the hazardous substances used or generated by the processes.
Display Screen Equipment Assessment	The assessment focuses on a particular individual and their PC workstation.
Fire risk Assessment	The assessment is carried out by areas but focuses specifically on the risk of fire occurring should a fire reach the particular area
Manual handling Assessment	The assessment specifically focuses on lifting, carrying and moving operations carried out in a certain operation that is identified in a general /area risk assessment.

Fire & Emergency Procedures

- Director of Health & Safety shall carry out a Fire Risk Assessment on the entire facility, using the premises Fire Certificate as a basis. Any engineering changes required or actions by Managers shall be notified to them through the H&S committee, or directly.
- An Emergency Procedure shall be developed as a result of the Fire Risk Assessment.
- The fire procedures shall be notified to employees at the fire points and in more detail on wall mounted notices.
- Employees are required to familiarise themselves with this information, detailing the location of exits, fire fighting equipment, points where the alarm can be raised, and where to assemble should the alarm be raised.
- Employees **MUST NOT**, under any circumstances block the emergency escape routes, inside or outside of the building.
- Fire fighting equipment shall be situated around the facility in line with the Fire Risk Assessment and facility Fire certificate to meet the needs of the building and its processes.
- The equipment, alarm and emergency lighting shall be inspected and tested on a regular basis.
- In an emergency situation any employee is entitled to use fire-fighting equipment, but wherever possible, trained Fire Marshals shall be on hand to use the equipment.
- Under normal non-emergency conditions however, it is a serious disciplinary offence for anyone to tamper with fire-fighting equipment.

Fire Marshals

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- The company will endeavour to train a sufficient number of Fire marshals to cover the different areas and shifts. Fire Marshals shall be responsible for promoting good fire prevention practices within the facility: maintaining clear routes of egress, removing unnecessary combustibles, monitoring the practices of contractors etc. Should an evacuation be initiated, Fire Marshals shall attempt to tackle a fire in line with their training if it is safe to do so. They shall also aid the evacuation and check the building before employees are allowed back in.

Smoking Policy

- Employees/Visitors may not smoke anywhere on the premises except in the designated area. This area being: **Outside the main entrance gates.**
- Smokers must ensure their cigarettes are properly distinguished and disposed of correctly in the smoke bins.
- Employees are encouraged to seek advice on giving up smoking with the local Occupational Health unit. Information leaflets, support groups and details of Helplines can be provided.
- Failure to observe the smoking rules is covered under the company's normal Disciplinary Procedures, General Misconduct.

Drugs & Alcohol Policy

- The company operates a policy to prevent and deal with drug and alcohol related incidents in the workplace.

Control of Substances Hazardous to Health

- Substances that are a result of both inputs and outputs to the Company's processes shall be assessed in line with the legislative requirements of COSHH (Control of Substances Hazardous to Health).
- The substances shall be recorded in the COSHH Register containing all such inputs and outputs to Company processes: with impacts on employees, but also the environment and local people outside the facility.
- A suitable and sufficient assessment shall be carried out by a competent person in order to assess the substance's impact on employees' health and safety, notices or Hazard Profile sheets shall be displayed in areas where the substance is used/produced.
- Employees must ensure they obey any guidance given in notices/instructions and that they use any Personal Protective Equipment required.

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- Where a potentially harmful substance is stored or present, it shall be correctly labelled so that it can easily be identified. Users of the substances are responsible for ensuring it is labelled up and that it is stored correctly.
- A competent person shall review COSHH Assessments every 2 years or sooner if one or more of the following occurs:
 1. The substance is substituted for an entirely different substance.
 2. The legal requirements affecting the substance change.
 3. There is an injury or illness as a result of the substance.
 4. There is a significant change in the process or storage location of the substance.

Display Screen Equipment

- Employees who use Display Screen Equipment (DSE) 1hour per day shall be asked to complete a DSE Risk Assessment.
- If any significant issues are identified then further action will be taken by the Director of Health & Safety or Health & Safety Officer.
- The assessments will be conducted at least every 3 years or sooner if one or more of the following occurs:
 1. The employee begins to suffer health problems possibly attributable to the use of the DSE.
 2. The legal requirements affecting DSE change.
 3. The location of the workstation set up of the employee changes significantly.

Manual Handling

- The General Risk Assessment of the facility and the various areas of operation shall be used to identify where a potential risk of injury from Manual Handling exists.
- A competent person shall carry out a Manual Handling Risk Assessment of the operation.
- The assessment shall be recorded by the H&S section and any findings communicated through the H&S committee or to Managers in the normal way.
- Assessments shall be reviewed every 3 years, or sooner if one of the following occurs:
 1. The operation or equipment changes significantly.
 2. The legal requirements affecting the operation or equipment changes.
 3. There is an injury as a result of the operation or use of the manual handling equipment.

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Authorisation to Use work Equipment

- Employees who have received basic induction training are authorised to use works equipment and production cell machinery.
- Production Supervisors shall ensure that new employees are closely supervised and supported during their first week of employment or while they are working on a training cell.
- Employees below the age of 18 shall be supervised by an experience operator whenever they are using works' machinery.
- Certain machinery and equipment within the facility shall be used by **trained personnel only**, holding an appropriate qualification. Use of the equipment by untrained and unauthorised personnel will be considered a disciplinary offence:
 - Use of Forklift Trucks
 - Cranes, Slings and Harnesses
 - Changing or mounting of abrasive wheels
 - The Electrical Supply: Only appropriately trained employees shall be allowed to work on the electrical distribution system. Contractors working on the electrical system shall be appropriately qualified and bring proof of their qualifications.

Personal Protective Equipment

- The requirement to wear personal protective equipment shall be defined by risk assessment of the activities being carried out.
- If it is determined that PPE is required, employees **MUST** wear the equipment at all times whilst carrying out activities where it is needed.
- Employees have a responsibility to look after equipment they are given, and while the Company will change items that are no longer fit to use because of expected wear and tear, employees losing or damaging equipment shall be charged for replacement items.

Authorised Contractors

- All contractors must be vetted by the Engineering Manager and/or Director of Health & Safety/Health & Safety Officer and added to the Approved Contractors Register.
- In order to be considered for Authorised Contractor Status a contractor must supply:

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- A statement or policy on control of its health and safety and environmental compliance.
 - A general Method Statement of work it intends to carry out.
 - General risk assessments or COSHH assessments for equipment or hazardous substances to be used.
 - Certificates of training where they are carrying out specialised tasks (e.g. electrical work, welding, removal of asbestos, use of cranes/platforms and forklifts).
- Where a contractor is involved in a major project (more than 6 workers on the project), under the supervision of the Project Manager and with the assistance of the HSE function where necessary, the contractor will complete a Risk Assessment particular to the project.
 - Contractors in return shall receive a “Contractor Pack” from the company and a brief induction of the safety and emergency measures of the building. In particular the information must cover.
 - Key hazards in the various areas of the facility.
 - Contact numbers of key personnel.
 - Emergency escape routes and control of spills procedures.
 - Location of asbestos containing materials in the building (if applicable)
 - Contractors must sign in and out in the same way as visitors do, so that people are aware they are present in the building.
 - Contractors must complete a Work Permit under the supervision of an experienced Maintenance Technician/Engineer when carrying out certain activities as defined below:

Special Permit Activities

- The activities require a Permit to be completed by employees of the Company or suitably qualified Contractors selected for the task.
- The permit must be completed the first time the activity is carried out by an employee or contractor before the activity commences.

Working on the Electric Supply

- The permit in particular must only be granted to those employees who can prove they have suitable qualifications for the task.
- The employee/contractor must ensure they “lock-out and tag-out” (isolating and securing the electricity supply in the area or machine being worked on). The permit

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itself or a suitable notice must be posted near the lock-out point to warn others of the work in progress and prevent accidental powering up of the supply or device.

Working at Height

- A permit shall be completed for work carried out at a height of over 2 metres from the ground. A permit is also required for any work carried out on the roof of the building.
- A permit is not required for ladder use below 2 metres provided the ladder is one that is maintained and monitored in the Company's Ladder Register.
- If the ladder is **not** a controlled ladder a Permit must be completed: falls and ladders failing from just 1 metre or below can still lead to significant injury.
- Working on the roof is highly dangerous and must be carried out by trained personnel only. Any contractors going on the roof must provide a Method Statement and make a Risk Assessment of their proposed activity, ensuring they have adequate supervision in case of emergency. They must complete the Permit under the Supervision of a Maintenance Technician/Engineer.

“Hot Work” Permits

- A Permit is required for welding on the premises. In particular the Permit and associated checks must focus on:
 1. Personnel are appropriately trained and qualified.
 2. Personnel are aware of the means of escape, and tackling a fire should an emergency situation occur, for the particular area they are working in.
 3. The welding equipment is checked and in good working order and appropriate fire extinguishers are close to hand.
 4. All combustible material is removed from a 5 metre radius around the site of the welding and there is enough ventilation to prevent fumes.
 5. A “fire watch” is maintained of the area for 2 hours after the hot work has been completed.

Visitors

- Visitors must report to Reception and be escorted at all times unless they are an approved contractor. If left to carry out work by themselves, they are to receive induction and a contractor pack.

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- When working without the supervision of an employee of the Company, contractors must identify themselves with labelled clothing or identification badges- supplied by the contractor.
- Visitors should observe safety rules and signage and ensure they wear protective equipment where needed, the supervising employee shall ensure this is made available to them.

Training

- The training needs of employees shall be identified by their Supervisor or Manager to the defined process as outlined in the Company's Quality Policy.
- In practice, this can be summarised as training needs being identified by the Supervisor or Manager, either to meet an immediate requirement or as part of an annual appraisal process.
- The identified training requirements shall then be summarised in a Training Plan and training authorised, vetoed or postponed by the Director of Health & Safety in line with overall Company objectives.
- The Manager of each function/department shall ensure employees are adequately trained to carry out their roles.
- Shop floor employees shall receive induction training followed by training by their Supervisor in the specifics of their role. Their training on machinery shall include training in Safety, then Quality and then techniques for Productivity. The level of their skill shall be recorded in a Training Matrix or on their individual Training Record where appropriate.
- External training shall also be authorised by the departmental/function Manager and any certification or testing recorded on their individual Training Record.
- The employees Director of Health & Safety shall evaluate external training following the training and the results recorded on their Training Record. Internal training shall be reviewed by the HS Department and as part of the appraisal process. The results will be used to determine future training providers and also improve the internal training processes.

Communication & Consultation

- Important information relevant to the health & safety of employees will be displayed on notice boards in areas such as the canteen. Staff and Management shall receive communication of health & safety issues and procedures by email or on notice boards in areas where they work.

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- The company operates an “open door” attitude to immediate health & safety concerns where employees can speak directly to the Health & Safety Team.
- The company operates a Health & Safety Committee that meets monthly to discuss health & safety issues. The committee has Company appointed and employee representatives.