



GPC GROUP

GPC GROUP LIMITED

HEALTH AND SAFETY MANUAL

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Section 1

Policy Statement

1.1 Policy Statement

GPC Group recognises that the health and safety of all persons affected by its activities is of the utmost importance. Responsibility for health and safety lies with the directors and includes the duties referred to in the Health and Safety at Work Act 1974 and in subsidiary regulations.

The Company also recognises the responsibility of employees and the part that they have to play in helping to achieve a safe working environment. Attention is drawn to employees' responsibilities under Sections 7 and 8 of the Health and Safety at Work Act.

The Company will provide the information, training and resources needed for the purpose of creating a safe working environment and set in place arrangements and procedures to ensure that this is achieved.

Directors, employees and contract staff should become familiar with and abide by Client's Health and Safety policies and procedures when working at their premises. Any significant difference between Company policy and procedures and those of clients should be reported to a director.

This Policy is reviewed on a regular basis by the directors, to ensure that all information contained herein is up to date and accurate.

Disciplinary action may be taken against any employee who carries out his or her duties in such a manner as to endanger the health and safety of others. Where such action or negligence is so dangerous as to constitute gross misconduct the employee may be liable to sanctions including summary dismissal.

Section 2

Organisation of Health and Safety Responsibilities

2.1 Introduction

Under the Health and Safety at Work etc. Act 1974, and the Management of Health and Safety at Work Regulations 1999, the Company has the duty to ensure, so far as is reasonably practicable, the health and safety at work of its employees and others affected by



its activities. For effective management of health and safety there must be involvement at all levels of the Company including directors, employees and contract staff.

The following sections outline the responsibilities of:

_The Board

_All employees and contract staff

2.2 The Board Responsibilities

The Board has overall responsibility for health and safety and is responsible on an executive basis for fulfilling this Policy. The Board may appoint competent employees to assist in this role and may give the authority to act on it's behalf as appropriate.

The Board is responsible for ensuring that health and safety provisions are met on a day to day basis. The nature of the company's business dictates that directors and employees will spend most of their working time at client's premises. The Board will review policies and procedures adopted by the company's clients and highlight any area's of concern.

The Board is responsible for:

- a) Ensuring all tasks carried out in their work areas are performed with the utmost regard for health and safety.
- b) Ensuring their place of work and working environment are properly maintained, and repairs, which affect health and safety, are carried out as soon as possible.
- c) Informing employees promptly of any changes in working practices that may affect health and safety.
- d) Ensuring employees are aware of and adhere to the Company Health and Safety Policy and Procedures and those policies and procedures of company clients, when working at their premises.
- e) Applying and enforcing the Office Health and Safety Standards (See Section 8 of this Policy).
- f) Leading, managing, driving and co-ordinating all health and safety activities that affect employees, contract staff and visitors to the Company's premises.
- g) Researching the Company's legal duties under health and safety legislation.
- h) Co-ordinating and initiating health and safety activities, including, annual health and safety risk assessments, display screen equipment workstation assessments, routine health and safety inspections.
- i) formulating the development of health and safety policy and procedures.
- j) Providing practical guidance, advice and methods to assist in the implementation of health and safety procedures.
- k) Monitoring accidents and incidents. Ensuring any accidents are investigated with a view to preventing a recurrence. Reporting to the Environmental Health Officer or the Health and Safety Executive as required.



l) Ensuring that there is sufficient and timely provision of information to facilitate employee and contract staff consultation.

2.3 Employee and Contract Staff Responsibilities

All employees and contractors are required to take reasonable care for their own health and safety and for that of other persons who may be affected by their actions. All employees and contract staff will co-operate with the Company to enable it to fulfil its obligations. All employees and contract staff have a duty to report health and safety concerns to the directors.

Employees and contract staff are responsible for:

- a) Taking reasonable care of the health and safety of themselves and of any other persons who may be affected by their acts or omissions at work.
- b) Co-operating with the Company as far as is necessary to enable the Company to discharge any duty or requirement imposed on it by any relevant statutory provisions.
- c) Avoiding intentionally or recklessly interfering with or misusing anything provided in the interests of health, safety, or welfare in pursuance of any statutory provision.
- d) Reporting any health and safety concerns to the directors.
- e) Following Office Health and Safety Standards defined in Section 8 of this Policy.

2.4 Consultation with Employees and Contract Staff

Under the Health and Safety (Consultation with Employees) Regulations 1996, employers must inform and consult workers and allow them to take part in discussions on all questions relating to safety and health at work, either directly, or through elected representatives.

The Board is responsible for ensuring regular communication with employees and contract staff.

2.5 Compliance

Failure to adhere to any policies contained herein and as varied from time to time, may result in disciplinary or legal action being taken against an employee or contract staff member, including summary dismissal and criminal prosecution.



Section 3

Emergency and Accident Procedures

3.1 Introduction

Under the Management of Health and Safety at Work Regulations 1999, the Company has a duty to provide procedures to be followed in the event of serious or imminent danger. All employees and contractors should remain conversant with the current procedures. They must ensure that their visitors know what to do in the event of an emergency.

3.2 Fire and Other Emergencies

Under the Fire Precautions Act 1971 and the Fire Precautions (Workplace) Regulations 1997 The Company has a duty to provide a safe place of work.

a) The nature of the company's business dictates that employees and contract staff will normally spend their working time at company client's premises. In the rare event that an employee or contract staff member should be present at non-client premises used by the company, the resident company director will be responsible for advising the Emergency Exit Procedures.

b) Employees and contract staff members will normally spend their working time at client's premises. It is their responsibility to ensure that they are aware of and are able to comply with the Emergency and Accident Procedures of each client which they visit.

c) All employees and contract staff members are responsible for ensuring that fire escapes and fire fighting equipment are kept free from obstructions at all time and at whichever premises they are working.

d) The directors are responsible for ensuring that actions to be taken in the event of an emergency are given to employees and contract staff and displayed in non-client premises used by the company.

3.3 Security Alerts / Bomb Threats

The directors are responsible for, co-ordinating instructions from the police, liaising with any Landlords and evacuating the building if appropriate.

a) Anybody who discovers a suspicious package must report it to a director, or the building landlord, immediately. It is essential that it is not handled and employees, contractors and visitors are immediately evacuated from the area.

b) Anybody who receives a security threat over the telephone must immediately alert a director of the building landlord.

c) Where a security alert or threat occurs at client's premises, any director, employee or contract staff member present should act in accordance with the client's policies and procedures.

3.4 Danger Areas and Permits to Work



Under the Management of Health and Safety at Work Regulations 1999, employees and contract staff members should not have access to areas where the level of risk is unacceptable without special precautions.

Access to areas such as plant and equipment rooms, areas of the building such as the roof

or an area that may be temporarily dangerous will be restricted to authorised personnel only. Where a Permit to Work System (to restrict and control access to authorised employees) is in place, employees will adhere to the system. Employees will not enter areas unless they are authorised to do so.

Where access to such areas is sought at client's premises, any director, employee or contract staff member should obtain authorisation in accordance with the client's policies and procedures.

3.5 First Aid

The company has a duty to ensure that first aid provisions are provided in accordance with the Health and Safety (First Aid) Regulations 1981. First aid provision is available at premises used by the company for business purposes.

When working at client's premises, directors, employees and contract staff members should ensure that they are familiar with the client's policies and procedures relating to first aid.

3.6 Reporting Accidents

Under the Reporting of Accidents, Diseases and Dangerous Occurrences Regulations 1995, The Company has a duty to report certain categories of accident, dangerous occurrences and disease to the Local Authority Environmental Health Department.

a) All employees and contract staff must report all accidents, injuries, near misses, work-related diseases and dangerous occurrences to a director within one working day of the event. Near misses (i.e. a narrow escape from an accident, a dangerous occurrence or a potential hazard) must also be reported to a director.

b) The directors maintain an Accident Book, into which all notified accidents are recorded and reviewed.

c) When working at client's premises, directors, employees and contract staff should ensure that they are familiar with and comply with the client's accident, diseases and dangerous occurrences policies and procedures.

Section 4

Display Screen Equipment Workstations

4.1 DSE Workstation Assessment

To meet the requirements of the Health and Safety (Display Screen Equipment) Regulations 1992 ("the Regulations"), the Company is responsible for assessing display screen equipment and workstations in order to reduce risks to health and safety.



4.2 Users of display screen equipment

All directors, employees and contract staff at the Company are defined for the purposes of these Regulations as “Users” of display screen equipment.

4.3 The workstation assessment programme

- a) The Directors are responsible for co-ordinating the workstation assessment programme.
- b) The Company must carry out workstation assessments for all its Users. Accordingly, all Users are expected to assist Health and Safety and to co-operate in the workstation assessment programme.
 - As part of this programme all existing and new Users will be asked to complete a self assessment questionnaire and submit it to a director.
 - As part of an ongoing process and independent of the programme, all new Users, Users who move or Users who receive new or re-organised equipment will be asked to complete a self assessment questionnaire.
 - In addition, any User who requests an assessment or who reports a problem will be asked to complete a self assessment questionnaire.
 - Users are reminded that they have a duty to report problems with their workstations to a director.
- c) Completed self assessment questionnaires will be submitted to a director who will establish whether any action is required.
- d) The directors will keep records of all self-assessment questionnaires and details of any follow-up action.
- e) When working at client’s premises, directors, employees and contract staff should ensure that they are familiar with and comply with the client’s workstation assessment programme.

4.4 Training and information

The Company is responsible for providing appropriate health and safety training and information for Users before any display screen work is carried out or whenever a Users workstation is substantially modified.

- a) The directors are responsible for ensuring that workstations are properly assessed. If appropriate a qualified external assessor will be supplied to make an assessment.
- b) When working at client’s premises, directors, employees and contract staff should ensure that they are familiar with and comply with the client’s policy on training and information relating to workstation assessment.

4.5 Responsibilities



a) Individual employees and contract staff are responsible for ensuring their display screen work is planned to include regular breaks or changes of activity in order to prevent intensive periods of on-screen activity. Individuals should make a director aware if they are unable to arrange breaks or changes of activity.

b) The Directors are responsible for facilitating alternative arrangements for their staff, as required in section a).

c) The directors are responsible for ensuring that all Users are provided with a copy of the 'Workstation Comfort Guidance', and encouraging staff to complete the workstation assessment.

d) Directors employees and contract staff are responsible for appraising themselves of the contents of the guidance and keeping themselves up to date.

e) When working at client's premises, directors, employees and contract staff should ensure that they are familiar with and are aware of their responsibilities regarding the planning of their display screen work.

4.6 Eye and eye sight testing

a) The Company encourages all directors, employees and contract staff to undergo an eye test at least once a year and time off work will be allowed for this purpose.

b) When working at client's premises, directors, employees and contract staff are encouraged to enquire if they qualify for any client eye testing programmes. Where available, participation is encouraged.

4.7 Workstation standards

a) The Directors are responsible to ensure that workstation furniture meets the minimum requirements set out in the Schedule to the Regulations and all new furniture meets current International Standards.

Section 5

Electrical Safety and Work Equipment

5.1 Electrical Safety

All electrical equipment and systems and any work involving electricity or proximity to electricity must meet the requirements of the Electricity at Work Regulations 1989, Memorandum of Guidance and current standards.

a) Electrical systems must, so far as is reasonably practicable, be constructed and maintained so as to be safe. Personnel responsible for the installation of new electrical systems will ensure that the requirements of the Regulations, Memorandum of Guidance and current standards are met. The requirements include provisions relating to insulation, protection, placing and earthing conductors, and installing switches or other devices as neutral conductors. Excess current



production must be efficient and suitably located, and there must be provision for cutting off the supply and isolating it.

b) All personnel are responsible for ensuring that every work activity, including operation, use and maintenance of a system or any work near a system shall be carried out in a manner so as not to give rise to danger.

c) Work on or near live exposed parts of equipment is not permitted, unless it is absolutely unavoidable and the following three conditions are satisfied:

- It is unreasonable in all the circumstances for the system to be dead
- It is reasonable in all the circumstances for the work to be carried out live
- Suitable precautions are taken to prevent injury.

d) The directors are responsible for ensuring that employees and contract staff who work with electricity must be competent to do the job and have the required technical knowledge and experience to prevent danger and avoid injury. If they do have such expertise they should be supervised as appropriate, having regard to the type of work.

e) The Directors are responsible for ensuring that all electrical systems and equipment are examined and maintained in accordance with the Regulations, Memorandum of Guidance and current standards.
– The schedule and records for inspection and maintenance are kept by the directors.

f) All personnel responsible for purchasing electrical equipment must provide safe and suitable equipment that is manufactured to current standards. The construction and or protection of electrical equipment must be appropriate for the type of working environment.

g) Any personal protective equipment provided must be suitable for the intended purpose, well maintained and properly used.

h) Only electrical equipment purchased by the Company should be used on its premises

i) Users of hand-held appliances should carry out a visual inspection of the appliance and its flexible cable each time before it is used.

j) All defective equipment should be removed from service immediately and reported to a director. Only employees or contract staff qualified to maintain or repair electrical equipment will be permitted to do so.

k) All portable appliances are tested on a regular basis

– The results of the examination are recorded in the electrical register

l) When working at client's premises, directors, employees and contract staff should ensure that they are familiar with and comply with the client's policies and procedures relating to electrical safety.

5.2 Work Equipment

The Company is responsible for ensuring that work equipment meets the requirements of the Provision and Use of Work Regulations 1998. The Regulations covers equipment that includes:



- _ Toolbox tools, e.g. hammers, knives, handsaws, etc
 - _ Machines, such as, photocopiers, drilling machines, compactors, etc
 - _ Ladders
 - _ Lifting equipment such as, hoists trucks, elevating work platforms
 - _ Vacuum cleaners, pressure water cleaners, etc
 - _ Motor vehicles that are not privately owned also fall within the scope of these Regulations.
- a) Where the safety of the equipment depends on the installation conditions or where deterioration may result in dangerous situations equipment must be inspected.
- Employees and contract staff are responsible for ensuring that inspections are carried out after installation and before the equipment is put into use, after assembly at a new site and at suitable intervals and after any exceptional circumstances.
- b) Employees and contract staff responsible for the purchasing of equipment must ensure that the equipment meets relevant health and safety requirements and current standards and has been designed for the purpose for which it is to be used.
- Any item of work equipment must comply with European Directives. This applies to all equipment bought since 1992. Manufacturers commonly fix a "CE" mark to the equipment as a sign of compliance to European requirements.
- c) Any work undertaken using the equipment will be in accordance with manufacturers' specifications and instructions.
- d) Work equipment will be maintained in an efficient state, in efficient working order and in good repair by employees or contractors qualified to undertake repairs.
- Maintenance of equipment will be recorded. Records are kept.
- e) The directors are responsible for ensuring that their employees and contract staff receive training on the use of work equipment and have health and safety information available to them and written instructions where appropriate. Where specific risks have been identified these will be reduced or controlled.
- f) Safe Systems of Work are required for the maintenance and operation of work equipment that is identified as potentially hazardous.
- g) All defective equipment should be taken out of service immediately and reported to a director.
- h) When working at client's premises, directors, employees and contract staff should ensure that they are familiar with and comply with the client's policies and procedures relating to work equipment.

Section 6



Noise at Work

Under the Noise at Work Regulations 1989, The Company has a duty to carry out the following activities:

- a) Ensure that suppliers of plant and machinery reduce noise emissions to the extent reasonably practicable and provide information on likely noise levels from their equipment.
- b) Measure noise levels in any area where workers are likely to be exposed to 85dB (A) where hearing protection must be made available, and 90dB (A) or more, where hearing protection must be worn. Noise exposure assessments should be conducted by a competent person wherever exposures equal or exceed the specified action levels.
- c) Guidance on when it is appropriate to introduce hearing checks is given in the Health and Safety Executive document 'Health surveillance in noisy industries'
 - Advice for employers' IND(G)193L. It is considered good practice for employers to carry out regular hearing checks on all employees whose daily personal noise exposures equal or exceed 90dB(A). Employees and contract staff are encouraged to report immediately to a director exposure to any acoustic incident that results in physical damage. The details of these incidents must be recorded, and employees and/or contract staff examined by an appropriate expert to investigate the extent of any physical damage (this may include a hearing check).
- d) Ensure that employees and contract staff make use of control measures including use of hearing defenders, and report any defects.
- e) Display external warning signs in ear protection zones.
- f) Maintain and review regularly any control measures.
- g) When working at client's premises, directors, employees and contract staff should ensure that they are familiar with and comply with the client's policies and procedures relating to noise at work.

Section 7

Safe Storage, Handling and Transport of Goods

7.1 Storage

Under the Health and Safety at Work Act and Control of Substances Hazardous to Health (COSHH) Regulations 1999, The Company has a duty to ensure safe storage, handling and transport of dangerous substances.



a) The directors are responsible for ensuring that safe storage is provided for any flammable, corrosive or toxic substances identified following risk assessments.

– Locked storage will be provided for any hazardous substances.

b) The directors must ensure that where goods or equipment are stored on racks, care must be taken to ensure that racking is strong enough to bear the weight that it is supporting.

– Manufacturers safe weight limits should be displayed and not exceeded.

c) Under no circumstances will asbestos or asbestos impregnated materials be brought onto or stored on the Company's premises.

7.2 Control of Substances Hazardous to Health

To meet the requirements of the Control of Substances Hazardous to Health (COSHH) Regulations 1999, the Company is required to ensure that wherever possible the use of any hazardous materials will be eliminated, or substituted with a safer product. If use of a hazardous material is unavoidable, a risk assessment will be carried out and appropriate control measures implemented.

a) Personnel responsible for purchasing hazardous substances are required to ensure that such substances are suitable for the task.

– They will ensure that the suppliers of materials provide full information on hazards of use and the appropriate precautions to take.

b) The directors are required to ensure that employees and contract staff are provided with information about the hazards associated with materials they use or encounter and provided with training where appropriate.

c) Where contractors are employed, the contractor is required to provide risk assessments for substances hazardous to health that they use.

– Copies of risk assessments will be kept at each site where the substances are used.

d) The directors are responsible for preparing safe systems of work and control measures for any process or activity involving hazardous or dangerous substances. Employees and contract staff must adhere to safe systems of work.

7.3 Control of Legionella Bacteria in Water Systems

To meet the requirements of the Health & Safety at Work Act 1974 and the Control of Substances Hazardous to Health Regulations 1999 concerning the risk from exposure to legionella bacteria, the Company will adhere to the Approved Code of Practice, (4th Edition) Legionnaires' disease: the control of legionella bacteria in water systems (L8).



a) L8 requires the Company to carry out a risk assessment every two years. The risk assessment identifies the risk of exposure to legionella bacteria from Cooling Towers & Hot and Cold Water Systems, allowing it to mitigate these risks. The risk assessment shall be to BS 8580 2010

b) The directors will ensure that a risk assessment is conducted every two years to identify the risk of exposure to legionella.

c) The directors will ensure that recommended actions are implemented as appropriate to mitigate these risks.

7.4 Personal Protective Equipment (PPE)

The Company is responsible for ensuring that where risks cannot be controlled by other means an assessment will be carried out to ensure that the appropriate personal protective equipment is provided to employees who may be exposed to a risk to their health and safety.

a) The directors are responsible for ensuring that personal protective equipment is maintained in an appropriate state, in efficient working order and in good repair.

b) The directors are responsible for providing a suitable store for personal protective equipment that is secure and protects equipment from the weather.

c) It is the responsibility of the directors to provide their employees and contract staff with instruction and training in the use of the personal protective equipment and its maintenance.

d) Every employee and contract staff member is required to use the personal protective equipment provided for them properly, in accordance with training and information, and to use the accommodation provided for it.

7.5 Lifting and Carrying

To meet the requirements of the Manual Handling Operations Regulations 1992, the Company is responsible for ensuring that directors employees and contractors avoid hazardous manual handling operations so far as is reasonably practicable.

a) Where hazardous manual handling operations cannot be avoided, the directors are responsible to ensure that a manual handling assessment is conducted and any risks of injury reduced so far as is reasonably practicable.

b) Assessments will be reviewed or repeated whenever there is a significant change to the manual handling operation, if an injury occurs, or if employees or contract staff members indicate that they may be experiencing problems.

c) Risk assessments will be kept at the site where the tasks are conducted.

d) The directors are responsible for ensuring that the necessary modifications are made to reduce identified risks.

e) Where a problem arises relating to a manual handling operation, the employee or contractor is required to inform a director immediately.



f) The Company will provide training on the principles of manual handling for all employees engaged in such activity and outline the risks to health and safety and how they may be avoided.

g) Only employees and contract staff trained in manual handling techniques should carry out manual handling tasks.

7.6 Cleaning and Waste Disposal

The Workplace Health, Safety and Welfare Regulations 1992 state that the workplace and furniture, furnishings and fittings will be kept sufficiently clean. The workplace should be kept free from waste materials wherever possible.

a) The directors are responsible for ensuring that premises are kept clean and free from the build up of waste.

b) Disposal of materials must be carried out under the terms of the Environmental Protection Act 1990. An approved or licensed carrier must dispose of controlled waste.

7.7 At Clients Premises

When working at client's premises, directors, employees and contract staff should ensure that they are familiar with and comply with the client's policies and procedures relating to safe storage, handling and transport of goods.

Section 8

Standards for Office Health and Safety

8.1 Work Areas

The following standards have been agreed by the directors and should be applied to all work areas:

a) Floor areas, passageways and corridors are not obstructed.

b) Fire exit routes, doors and fire fighting equipment are always kept free of obstructions.

c) The floor around and underneath workstations is kept clear of papers, files and personal items, so cleaners can clean thoroughly.

d) Archiving is carried out on a regular basis.

e) Papers, files, etc are not stored on top of or around electrical equipment, such as monitors.

f) The tops of cupboards or high filing units are free from stored items.

g) The height of storage is restricted to about head height wherever possible.



- h) The weight in filing cabinets and shelves is evenly distributed.
- i) Employees do not run on the premises.
- j) Rubbish is removed daily.
- k) Faults are reported to a director as soon as possible.
- l) There is clear access to use window blinds for employees and contract staff seated by windows.
- m) There may be additional standards for non-office areas, and appropriate rules and procedures will apply. These rules and procedures must be documented and held on site for inspection at any time. All employees working in these areas must be made aware of such procedures and be familiar with their content.
- n) When working at client's premises, directors, employees and contract staff should ensure that they are familiar with and comply with the client's policies and procedures relating to safe storage, handling and transport of goods.

8.2 Participation in health and safety

- a) The company holds a meeting every two years to discuss health and safety. All directors, employees and contract staff are invited.

Section 9

Employee Health

9.1 Reporting Health Problems

All employees and contract staff have a duty to inform the Company of any health problem that might affect their ability to carry out their work safely, including contraction of or contact with infectious diseases. Employees and contract staff should report any health problems to their General Practitioner and a director

9.2 Promoting Good Health

The directors aim is to protect and maintain employees' good health through the formulation of policies that promote a healthy working environment and ensures compliance with health and safety legislation. This includes, when appropriate:

- _ Health screening;
- _ Advice and support to business travellers;
- _ Access to professional services;
- _ Advice on an employee's rehabilitation following injury or illness;



- _ Health education programmes;
- _ Advice on policies and procedures to ensure compliance with the medical and health aspects of H&S legislation;
- _ Assessment of risks in line with statutory requirements

9.3 Pregnant Women at Work

Under an amendment to the Management of Health and Safety at Work Regulations, the Company must take particular account of new and expectant mothers when assessing the risks in the workplace. These Regulations cover a woman who is pregnant, or who has given birth or miscarried in the last six months or who is breast-feeding. General workplace risk assessments will take into account any specific risks to pregnant women and any necessary control measures will be put in place to protect the woman's health and safety.

There are no known health and safety reasons for pregnant women to stop working with Display Screen Equipment (DSE). However, women who are pregnant or planning children and are worried about working with DSE should be given the opportunity to discuss their concerns with their General Practitioner

9.4 Working Time Directive

The Working Time Regulations 1998 establish limits upon working time and obligations relating to work and rest periods. Provisions include:

- _ a maximum 48 hour working week averaged over a reference period;
- _ a minimum daily rest period of 11 consecutive hours per twenty four hour period;
- _ a rest break where the working day is longer than six hours;
- _ a minimum rest period of one day a week; and
- _ a statutory right to annual paid holiday of 4 weeks;
- _ Night working must not exceed eight hours per twenty four hour period on average.

9.5 Young People at Work

The Health and Safety (Young Persons) Regulations amend Regulation 3 of the Management of Health and Safety at Work Regulations 1999 and state that the Company must evaluate risks and take measures to protect young people. All people under the age of 18 years are considered to be "young people" for the purpose of these Regulations. An evaluation should be made before a young person commences work at the company or when their working conditions change. Where the evaluation reveals a risk, an appropriate assessment and monitoring of their health is to be provided at regular intervals. The company must inform young people, and in the case of children (under 16 years of age) also inform their legal representative of possible risks and the control measures in place. Children under 13 years of age are generally prohibited from any form of employment.

All directors intending to employ a young person should inform the other directors to ensure that appropriate risk assessments are conducted. In all cases, supervision by competent persons must be provided.

9.6 Smoking

Under the Health and Safety at Work Act employers have a duty to provide a safe and healthy workplace. The Company has recognised the importance of protecting non-smokers from breathing air



polluted by tobacco smoke and has implemented a No Smoking Policy in all premises. Accordingly, all areas within the buildings will follow the 24 hour No Smoking Policy, including private offices. All employees shall adhere to the no smoking policy.

9.7 Drugs and Alcohol

Selling, purchasing, using, possessing or being under the influence of any Controlled Substance without medical authorisation during the working day, on the Company's premises or while conducting Company business, is inconsistent with the Company's business interests and will be grounds for disciplinary action up to and including termination. In addition, the Company prohibits the abuse of alcohol in any way relating to the Company. The provision or consumption of alcohol in reasonable and moderate amounts at Company sponsored social events or in connection with client entertainment is permitted.

9.8 At Clients Premises

When working at client's premises, directors, employees and contract staff should ensure that they are familiar with and comply with the client's policies and procedures relating to employee health.

Section 10

Health and Safety of Contractors

10.1 Health and Safety of Contractors

Under the Health and Safety at Work Act and the Management of Health and Safety at Work Regulations (Regulations 7, 9, 10 and 13) the Company has a duty to contractors working on its premises.

a) Directors, employees and contract staff authorised to hire contractors should review the contractor's competence to carry out the work. The level of questioning and detail required from contractors prior to their employment should be proportionate and appropriate to the level of the risk involved in the nature of the work that the contractors will be undertaking. Only authorised contractors are allowed on company premises.

b) Directors, employees and contract staff authorised for hiring contractors for construction projects are responsible for ensuring that the requirements of the Construction (Design and Management) Regulations 1994 are met for all Notifiable Construction work. They will:

- Appoint a competent person as planning supervisor and principal contractor;
- Provide the supervisor and designers with information relevant to the health and safety of the project;
- Be reasonably satisfied that any designers or contractors are competent and have made adequate provisions for health and safety;
- Ensure work does not begin until adequate provisions have been made for health and safety.



c) Directors, employees and contract staff responsible for hiring contractors are required to ensure that contractors are provided with the necessary information, instructions, permits to work and supervision, to enable all people on the company's premises to avoid hazards and contribute positively to their safety and health at work.

d) The contractor is required to take all reasonable steps to inform the Company about the risks to health and safety arising out of, or in connection with, the contractor's activity on the Company's premises.

e) Authorised Company directors, employees and contract staff are responsible for appointing a competent person to take responsibility for overseeing the work and safety standards of any contractors.

f) The Company will provide health and safety information to temporary workers as appropriate.

10.2 Working alone

The Company will ensure, so far as is reasonably practicable, that employees and self employed contractors who are required to work alone or unsupervised for significant periods of time, are protected from risks to their health and safety. Personnel responsible for employees working alone must carry out appropriate risk assessments and ensure that there are sufficient control measures to reduce risks to their health and safety. They must sign their start time and finish time and their exact specific location not just the building and formally provide this information in writing to a director and the client managing agent when on site. Both should be informed at the conclusion of the activity.

Working alone does not mean that necessary risk assessments can be avoided, and it must be carried out as a precursor to any activity and approved prior to action.

10.3 At Clients Premises

When working at client's premises, directors, employees and contract staff should ensure that they are familiar with and comply with the client's policies and procedures relating to the health and safety of contractors. This is in addition to 10.2 above.

Section 11

Training and Information

11.1 Health and Safety Training and Information

Training and information contributes directly to the Company's health and safety culture.

a) The Directors are responsible for ensuring that new employees receive health and safety information, including arrangements for first aid, and emergency procedures on arrival at the Company.

b) Directors must ensure that job-specific training and information is provided where



required. Additional training will be necessary if an employee takes on new responsibilities, or where there is a change in work activity or the work environment.

- c) The directors will provide health and safety information during induction training.
- d) The directors will keep records of health and safety training.
- e) Training and information needs will also be identified through the risk assessment procedure.
- f) When working at client's premises, directors, employees and contract staff should actively seek training and information on the client's policies and procedures relating to health and safety.

Section 12

Risk Assessment and Monitoring of Health and Safety

12.1 Risk Assessment

Under the Management of Health and Safety at Work Regulations 1999, the Company is required to carry out risk assessments and eliminate or reduce risks from hazards.

- a) The directors are responsible for coordinating the annual risk assessment programme.
 - Records of risk assessments are maintained by the directors.
 - Recommended actions arising from risk assessments are implemented by the directors who are responsible to ensure that the actions are completed within the recommended timescale.
- b) Risk assessments will be reviewed if there is a significant change to the work area, work practices or equipment or if there is any reason to suspect that it is no longer valid.
- c) More specific risk assessments required by other regulations are the responsibility of employees and contract staff.

12.2 Monitoring and Improving Health and Safety

The Management of Health and Safety at Work Regulations 1999 require the effective management of health and safety. The Company has a commitment to controlling health and safety risks and monitoring and improving health and safety.

- a) The Company conducts a regular audit and review of the management of health and safety against the requirements of the Health and Safety Policy and Procedures, legislation and best practice.
- b) The directors are responsible for reviewing the Health and Safety Policy.



Section 13

References

13.1 References

The Health and Safety at Work Etc. Act 1974
The Health and Safety (First Aid) Regulations 1981
The Health and Safety (Young Persons) Regulations 1992
The Management of Health and Safety at Work Regulations 1999
The Control of Substances Hazardous to Health Regulations 2002
The Control of Asbestos 2006
The Control of legionella bacteria in water systems ACoP L8 Third edition
BS 8580 2010 Legionella Risk Assessment
The Electricity at Work Regulations 1989
Electricity at Work Safe Working Practices HSG 85 (Review due 20/3/2012)
The Noise at Work Regulations 2005
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995
The Provision and Use of Work Equipment Regulations 1998
The Personal Protective Equipment Regulations 1992
The Manual Handling Operations Regulations 1992
Manual Handling Regulation Guidance L21 2011
Lifting Operations and Lifting Equipment Regulations LOLER (1998)
Provision and use of Work Equipment Regulations PUWER (1998)
The Health and Safety (Display Screen Equipment) Regulations 1992 amended 2002
The Workplace (Health Safety and Welfare) Regulations 1992
Construction (Design and Management) Regulations 1994
The Health and Safety (Consultation with Employees) Regulations 1996
The Fire Precautions Act 1971
Regulatory Reform (Fire Safety) Order (2005)
The Environmental Protection Act 1990
The Fire Precautions (Workplace) Regulations 1997
Institute of Electrical Engineers 18th Edition Wiring Regulations BS7671
Code of Practice for In-service Inspection and Testing of Electrical Equipment 3rd Edition
Electrical Equipment (Safety) Regulations (1994)
Managing the causes of work related stress HSG 218

Signed as the person responsible for Health and Safety

Grant Phillips
Managing Director

8th January 2023