



Health & Safety Policy

Zebra MTD Ltd
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Registered Company Number: 08674779

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Contents Page

- 1.0 General Statement of Intent
- 2.0 Roles and Responsibilities
- 3.0 Arrangements
- 3.1 Accident Reporting & Investigation
- 3.2 Alcohol and Controlled Drugs
- 3.3 Asbestos
- 3.4 CDM Regulations
- 3.5 Communication with workers
- 3.6 Contractors and Sub-Contractors
- 3.7 COSHH Assessments
- 3.8 Display Screen Equipment (DSE)
- 3.9 Electricity at Work
- 3.10 Environmental Protection
- 3.11 Environmental Waste Management & Pollution Control
- 3.12 Equipment Inspections & Records
- 3.13 External Health and Safety Consultants
- 3.14 Fire Safety
- 3.15 First Aid Arrangements
- 3.16 Guidance
- 3.17 Hand Arm Vibration Syndrome (HAV)
- 3.18 Health & Safety Records
- 3.19 Health & Safety Training
- 3.20 Health and Safety Responsibilities of Supervisors
- 3.21 Health Surveillance
- 3.22 Lone Working
- 3.23 Machinery Maintenance
- 3.24 Machinery Operation
- 3.25 Manual Handling Assessments
- 3.26 Method Statements (Safe Operating Procedures)
- 3.27 Noise
- 3.28 PAT Testing
- 3.29 Personal Protective Equipment
- 3.30 Pregnant Workers
- 3.31 Purchase Policy
- 3.32 Restricted Areas and Equipment
- 3.33 Risk Assessments
- 3.34 Safety Audits and Monitoring
- 3.35 Serious or Imminent Danger
- 3.36 Temporary Workers and Agency Alignment
- 3.37 Transport & Company Vehicle Safety
- 3.38 Welfare
- 3.39 Working at Height
- 3.40 Young Workers
- 3.41 Z1 - Appendix 1 - Existing PPE Requirements

1.0 General Statement of Intent

Zebra MTD Ltd and its member companies, including, but not limited to, The Calendar Club, Otter House Ltd, Vista Stationery and Print Ltd, calendarclub.co.uk Ltd, and Party HQ Ltd (hereafter collectively referred to as the, "Company") is committed to ensuring the safety of its employees, customers, members of the public and anyone else who are affected by its operations.

The Company commits to operating in accordance with the Health and Safety at Work (etc) Act 1974, The Management of Health & Safety Regulations and all other current applicable regulations and codes of practice, so far as is reasonably practicable.

The Company will ensure that significant risks are assessed and suitable and sufficient measures are adopted to allow each employee or contractor to carry out his/her duties safely and without risk to health. Suitable equipment will be provided and maintained in a safe condition, and safe systems of work will be devised and implemented.

The Company will strive to achieve continuous improvement in health and safety performance.

The Company will provide all necessary resources to ensure that all health and safety matters are adequately supported. This includes, time, funding, training, personal protective equipment, appropriate equipment and tools, maintenance for such equipment, external advice, where necessary, and any other resource necessary to ensure the health and safety of our employees and contractors.

Each employee and contractor will be made aware of his/her responsibility for his/her own health and safety and that of others. All employees and contractors will be given the opportunity to consult with Company management on matters relating to health and safety, or to appoint a representative to do so.

Where necessary, the Company will arrange or provide suitable training for both management and operatives, in particular where new work practices, equipment or legislation are introduced, or gaps in employee knowledge are identified.

The company will seek external advice, as necessary, to ensure that its health and safety policies, working practices and equipment are up to date and in accordance with current legislation.

Ultimate responsibility in all areas of safety rests with the Group Managing Director. This duty is of no less importance than any of the responsibilities attached to that position.

Reviews of health and safety policy will be conducted annually. The monitoring of all issues relating to this policy is the responsibility of the person appointed by the Group Managing Director to assume overall responsibility for health and safety.

Signed:



15 June 2017

Anthony Jervoise
Finance Director

Zebra MTD Ltd

Please note that this document is current as of Thursday 15th June 2017 . For the latest version of this uncontrolled document please consult the author

2.0 Roles and Responsibilities

Organisation and Managerial Responsibilities;

The Company is owned and managed by the directors and external shareholders who are directly responsible for health and safety matters within the company. The Director Responsible for Health and Safety will seek external assistance where necessary to ensure that the company meets both its statutory obligations and the objectives laid down within this Health and Safety Policy.

The organisation of the workforce is the responsibility of the directors who are responsible for ensuring that the Company's Health & Safety Policy and associated procedures are implemented and adhered to by all employees and contractors.

Day to day management of the Company's operations is the responsibility of the directors who may be supported by managers and supervisors, some being responsible for satellite locations operated or managed by the Company.

Employee/Contractor Responsibilities;

Each and every employee or contractor has a statutory duty to take reasonable care in relation to his/her own health and safety, and the health and safety of any other person who may be affected by his/her acts or omissions.

Therefore, it is the duty of all employees or contractors whilst at work to:

- take reasonable care for the health and safety of themselves and others, who may be affected by their acts or omissions at work.
- co-operate with the Company to ensure compliance with all Company health and safety policies and procedures.
- refrain from intentional or reckless interference with equipment and/or systems provided in the interest of health, safety and the environment.
- co-operate with management when required on such matters as accident prevention and all procedures with regard to health, safety and the environment as set out in the Health & Safety at Work Act and the Environmental Protection Act (as amended), and all associated Regulations and Accepted Codes of Practice.
- maintain good standards of housekeeping in Company premises and on client premises.
- report any accident or incident, including near-misses (whether or not personal injury results), to the Accident Reporting Contact or the Person Responsible for Accident Reporting.
- report any defects in equipment without delay to their immediate Supervisor/Manager and not to attempt repairs which they have not been authorised and specifically trained to undertake.
- ensure that no potentially hazardous item, substance or machine is brought on to site or used without the prior knowledge and authority of their immediate Supervisor/Manager.
- use and, if applicable, wear any item of Personal Protective Equipment required by the task or operation they are undertaking. It is a requirement of law that any equipment supplied for safety must be used and, when not in use, properly cleaned, stored and maintained.

To undergo any health, safety, environmental and operational training deemed necessary by the Company.

Staff Consultation;

If an employee or contractor becomes aware of any potential breaches of health and safety or any unsafe working practices he/she must notify the Health and Safety Manager or their Supervisor/Manager, immediately.

If an employee or contractor believes that health and safety procedures may be improved, for example by use of alternative equipment, he/she is encouraged to discuss any suggestions with their Supervisor/Manager and the Health and Safety Manager.

The Company will provide health and safety information to, and seek the views of, its employees and contractors to ensure that those impacted by health and safety measures are consulted.

Specific Safety Functions and Named Responsibilities;

Safety Function	Person Responsible
Health and Safety Management	Andy Eills
Fire Manager	Gee Barrett
Warehouse Equipment Inspection Recording	Gee Barrett
Office Equipment Inspection Recording	Andy Eills
First Aid Manager	Andy Eills
Health and safety responsibility for direct reports	Company Managers/Supervisors
Health and Safety responsibility for own areas of control	Company Managers/Supervisors
Accident Reporting Contact	Gemma Haydon
Person Responsible for Accident Reporting	As delegated for locations other than head office

3.0 Arrangements

This section defines our company arrangements and policies for dealing with our activities.

3.1 Accident Reporting & Investigation

It is the policy of the Company that **all** accidents, incidents and near misses are reported to the Accident Reporting Contact, or for premises other than the Company head office, the Person Responsible for Accident Reporting, and recorded in the Company's accident recording system.

The main objective of accident, incidents, near misses reporting and investigation is to reduce incidents and prevent future accidents.

It is be the responsibility of the Group MD or his nominated representative to notify the Health & Safety Executive in respect of any accident or occurrence for which notification is required by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

At the time this policy was produced, the following must be reported under RIDDOR:

- Deaths
- Fractures (but not to digits or toes)
- Amputations
- Permanent loss of sight
- Crushing damage to internal organs
- Serious burns (10% to eyes, lungs or vital organs)
- Scalpings (separation of skin from head)
- Unconsciousness from head injury or asphyxia
- Enclosed space injuries
- Injuries requiring more than 7 days off work
- Hospitalisation of members of the public
- Carpal tunnel syndrome
- Severe cramp of the hand or forearm
- Occupational dermatitis
- Hand-arm vibration syndrome
- Occupational asthma
- Tendonitis or tenosynovitis of hand or forearm
- Any occupational cancer
- Any disease attributed to an occupational exposure to a biological agent
- Collapse or failure of lifts or lifting equipment
- Plant or equipment hitting overhead power lines
- Explosions or fires causing work to stop for 24hrs or more
- Gas accidents
- Any dangerous occurrence that did not result in injury or death, but which could have done so

Any accident resulting in more than minor injuries or an incident which might have resulted in serious injury will be investigated by the Group MD or his nominated representative. Depending upon the circumstances of the accident, the Group MD or his nominated representative may seek the assistance of an external Health and Safety Advisor, both in the investigation and the formulation of preventative procedures to avoid repetition.

The Company recognises that a study of the circumstances will help to reduce or remove the causes of accidents and, in this regard, specifically:

- Accident Reports will be examined over a period of time, to ascertain whether preventative measures have been effective in reducing accidents.
- Investigation and reporting must be accurate, complete and consistent.
- All accidents and incidents resulting in injury to any persons, or near misses, on the premises or sites for which the Company holds responsibility, must be reported immediately to the Accident Reporting Contact or the Person Responsible for Accident Reporting and be recorded in the company Accident

Reporting system.

- Where there is more than one person injured in an accident, a separate report must be filed for each person.
- All relevant questions in the Accident Report must be completed for every accident resulting in personal injury.

3.2 Alcohol and Controlled Drugs

It is categorically forbidden for employees to enter sites or places of work, to drive a vehicle, use or operate company plant and equipment, or to assist or supervise in its use, whether on or off Company business, in an unfit state owing to the influence of alcohol or illegal drugs and other substances. Disciplinary action will be taken against employees or contractors caught in the possession of illegal drugs on Company or client property or in Company vehicles. Employees taking medicines or prescribed drugs under the direction of their G.P, Dentist, or Hospital Doctor, that may affect their ability to carry out their work duties have a duty of care responsibility to ensure such use of prescribed substances does not constitute an unreasonable risk to the health and safety of themselves or others, and must notify their immediate Supervisor/Manager.

3.3 Asbestos

Asbestos is recognised as being an extremely hazardous substance and as such must be treated with the utmost care. When working on site, employees and contractors must assume any suspicious asbestos-like material is asbestos and stop work unless there is conclusive evidence to the contrary.

No disturbance such as drilling, breaking or cutting, e.t.c., shall be carried out to any material suspected of containing asbestos fibres. Any suspicious material must be reported to the Health and Safety Manager and/or the employee or contractor's Supervisor/Manager, immediately.

The Company policy is that employees will not generally work on asbestos products. Under limited circumstances and when authorised, Company employees, with an appropriate current training certificate, will be allowed to conduct non-licensed asbestos works, as prescribed by the HSE. This type of work will be risk assessed separately from other tasks. Notifiable non-licensed work (NNLW) must be notified to the HSE before commencement of work. A copy of the Risk Assessment and Method Statement must be signed by all employees when working with asbestos. The Company will record all projects involving NNLW and keep records of employee health checks for those working on NNLW, this must be carried out prior to the start of work and renewed on a three year cycle.

3.4 CDM Regulations

The Company recognises the requirements of the CDM regulations and makes every endeavour to comply with them.

The regulations call for:

Competence of All

A person must be capable of carrying out the duties placed on him/her and must only accept such duties in the knowledge that they are competent to carry out them out.

No person may arrange for a person to carry out works unless he/she is competent or under the supervision of a competent person.

Co-operation of employees, contractors and others

Every person involved in construction, maintenance or repair works must seek the co-operation of any other persons concerned at the same or adjoining site or area so far as is necessary in order to ensure all may carry out works safely. Similarly, he/she must co-operate to ensure others may continue with their works safely.

All persons involved must report anything which is likely to endanger the health or safety of him/herself or others.

Supervisors have been appointed in order to ensure construction, maintenance or repair work is managed such that it may continue safely where multiple trades or activities may be ongoing simultaneously. Liaison with others allows arrangements to be made that enable all to continue in a safe manner.

Co-ordination of activities

All persons must co-ordinate their construction, maintenance or repair activities with one another in a manner such that, so far as is reasonably practicable, the health and safety of persons carrying out the work and anyone affected by the construction work will remain safe from harm at all times.

It is recognised that all construction, maintenance or repair works may not be able to continue at the same time, therefore Supervisors will discuss and plan such that the works may progress safely.

Prevention of accidents

Every person must ensure that they apply general principles of prevention, so far as is reasonably practicable, to ensure the safety of all works during all stages of a project or activity.

This is a priority for all activities and the business will ensure that method statements and risk assessments are produced for relevant tasks which identify arrangements for safe working. All personnel will be briefed on these to ensure they understand the arrangements and the risks that may be encountered by not following procedures.

Duties of Contractors

All Contractors and Principal Contractors have specific duties placed upon them under these regulations and the Company is fully aware of them and endeavours to comply with them, so far as is reasonably practicable. Relevant personnel will be made aware of these duties through in-house training

The current CDM Regulations apply to most common building, civil engineering and engineering construction work, including refurbishment and improvement works. In the event that a project falls within the requirements of CDM, then the Principal Contractor must make provision for Welfare facilities as outlined under Schedule 2 of the CDM Regulations.

The company will notify HSE if any construction work is expected to either, last longer than 30 days and have more than 20 workers simultaneously involved on site at any one time, or exceeds 500 person days of construction work.

3.5 Communication with workers

The Company uses a variety of methods to communicate information with employees and sub-contractors, including face-to-face discussion, company-wide bulletins, training activities, employee correspondence, and health and safety meetings. A notice board at our the head office is also kept up to date with statutory and non-statutory health and safety information.

Communication with employees whose first language is not English will be carried out using one or more of the following methods;

- Ensuring adequate time to consult with employees where language and/or literacy may be an issue, so that the employee(s) has sufficient time to absorb the information and respond.
- Use of an interpreter (this may be a trained work colleague).
- Language translation of information.
- Use of pictorial information and internationally understood signs, where appropriate
- Where information has to be in English, the use of clear and simple language, and the allowance of time to communicate issues adequately.

3.6 Contractors and Sub-Contractors

All contractors and sub-contractors who work for the Company will comply with the Company's;

1. Health and Safety Policy.
2. Emergency procedures.
3. Hazard/accident reporting procedures.

All accidents and near misses must be reported to the Accident Reporting Contact or Person Responsible for Accident Reporting and recorded in the Accident Recording system.

A copy of the Company's Health and Safety Policy can be requested from the Health and Safety Manager.

All contractors must be assessed for relevant competence, prior to commencing work on behalf of the Company.

All Company Directors, Managers and Supervisors who engage contractors and subcontractors are responsible for assessing and controlling such contractors in the work or services they undertake on behalf of the Company.

3.7 COSHH Assessments

It is the responsibility of any employee who purchases or obtains substances for use in Company activities, to assess whether said substances are hazardous to health, and if so, to report this fact to the Health and Safety Manager.

All materials or substances utilised during Company activities, which may be hazardous to health, will be subject to a formal COSHH Assessment, conducted by the Health and Safety Manager. A register of hazardous substances will be kept at the Company head office, together with all relevant Safety Data Sheets. A copy of relevant COSHH Assessment(s) will be communicated to the operative(s) providing instruction for safe use and the action(s) to take upon harmful inhalation of or contact with the substance.

3.8 Display Screen Equipment (DSE)

Working with Display Screen Equipment is recognised as being a major cause of injury and ill health at work. The Company will conduct risk assessments and provide information, instruction and training to all employees assessed as being "DSE Users", as defined by the relevant regulations. Employees must carry out the recommendations of the risk assessment and must report instances of injury or ill health suspected as being caused by DSE work to the Health and Safety Manager at their earliest convenience.

The Company will take all reasonably practicable measures to ensure that the workstations and working environment of DSE Users do not cause ill effects to their health or exacerbate existing ill-health conditions associated with DSE usage.

The Company will provide free eye tests and DSE-specific corrective appliances when requested by DSE Users, on not less than an annual basis for eye tests and on such occasions where an eye test indicates the need for new corrective appliances. such expenditure by the Company will be limited to amounts considered reasonable by the Company, but this will not prevent contributions by employees to cover the differential between the Company limit and the total cost of more expensive services or products selected by the employee.

3.9 Electricity at Work

All work associated with any electrical system on the Company's premises or for premises for which the Company holds responsibility will be undertaken in strict compliance with the Electricity at Work Regulations.

Only competent and/or qualified electricians are permitted to work on electrical equipment and systems, including changing of fuses, carrying out repairs or maintenance of electrical equipment and installation of accessories.

A Permit to Work will be required when live working or testing and must only be carried out by competent and trained persons. Lone working is not allowed when live work takes place.

3.10 Environmental Protection

The Company will comply with the Environmental Protection Act, and any other associated statutory legislation and Approved Codes of Practice (ACOP). This applies to all those who are employed by the Company or who are protected by its undertakings. Employees must familiarise themselves with, and co-operate in the implementation of this policy by complying with any related environmental control measures. This includes compliance with the requirements of the Site Waste Management Plan.

3.11 Environmental Waste Management & Pollution Control

The Company recognises the importance of meeting legal requirements, managing its waste responsibly, reducing the volume of waste sent to landfill and reusing and recycling waste, where possible. Waste is defined as the unwanted materials, substances and equipment arising from the Company's activities.

The Company will identify potential waste disposal requirements of any activity and make adequate provision to ensure its disposal is suitably managed in accordance with the current Controlled Waste Regulations.

The Company will determine the nature of the waste for disposal and will ensure that a suitable assessment is undertaken, that appropriate safe working procedures are devised and suitable containment of waste is confirmed.

When undertaking removal of waste materials or products, the Company will ensure that they are registered as a carrier in accordance with the Controlled Waste (The Controlled Waste (Registration of Carriers and Seizure of Vehicles) (Amendment) Regulations). Where contract carriers are to be engaged to remove the waste, the Company will confirm that those appointed are suitably registered to undertake such activities and will confirm the proposed method and location of disposal.

The Company will:

- Ensure that waste management is performed in accordance with all waste legislative requirements, including the duty of care, and to plan for future legislative changes and to mitigate their effects.

- Minimise waste generation at source and facilitate repair, reuse and recycling in preference to the disposal of wastes, where it is cost effective.
- To coordinate each activity within the waste management chain segment pertaining to the Company.
- Promote environmental awareness in order to increase and encourage waste minimisation, reuse and recycling.
- Ensure the safe handling and storage of waste at Company premises.
- Provide appropriate training for staff regarding waste management issues.
- Where waste generated is the responsibility of the principal contractor, the Company will cooperate with the site rules as applicable.

3.12 Equipment Inspections & Records

The users of equipment must carry out a daily visual inspection of it, prior to use, and must immediately report any defect, or suspected defect to their Supervisor.

The respective Responsible Person for Equipment will arrange regular inspections of all company equipment to include ladders, other access to height, PPE, tools, machines, forklift trucks, e.t.c., and will keep a record of such inspections in compliance with PUWER. For the purposes of record keeping, each item of equipment shall have its own unique reference, which shall be clearly marked on it. Markings must be maintained so that they are clearly discernible at all times.

Works transport will be visually checked by the designated person on a regular basis to ensure correct operation of all functions, maintenance of fluid and pressure levels, signs of wear and tear, e.t.c.

Servicing and MOT testing will be carried out in compliance with manufacturer recommendations and current vehicle regulations.

Where an inspection reveals a defect, it will be the responsibility of the Manager/Supervisor, and ultimately, the relevant Responsible Person for Equipment to ensure that the equipment is not used until such time as a suitable repair has been effected. If the equipment is beyond repair it must be discarded, whether or not a suitable replacement is available, and any work relying on the use of such equipment must be suspended until a suitable replacement is available.

3.13 External Health and Safety Consultants

The Company currently use HS Direct Ltd who provide:

- advice of any new safety legislation or changes in existing legislation
- general assistance to the Company to aid in the fulfillment of its obligations and duties as set out in statutes
- assistance, where required or requested, with the initial implementation of the changes required by changes in safety legislation
- an online H&S management system

3.14 Fire Safety

In the event of a fire at Company premises, the Fire Manager, and in their absence, the Deputy Fire Manager will take charge and implement the Fire Plan. In their absence, the most senior person on site will assume the responsibility, aided by the Fire Marshalls.

Where the Company is responsible for satellite locations, such as Retail Stores or temporary storage facilities, it is the responsibility of the relevant Company MD, together with the Health and Safety Manager, to ensure that all fire safety procedures are implemented in, and are communicated to employees and contractors who use, such premises.

Where a hot work permit is raised, all Company employees and contractors are expected to adhere to its requirements.

As required by legislation, Fire Risk Assessments will be carried out in all premises and areas occupied by or under the responsibility of the Company. Risk assessments will consider sources of ignition and fuel, evaluate the risk of a fire starting and the effect of the fire on people, and assess the adequacy of fire prevention, communication, containment and evacuation measures. The assessment will indicate the necessary control measures to remove or reduce the risk of fire starting. The significant findings of the assessment will be communicated to the relevant persons together with the necessary remedial actions, instruction and training.

Means of Escape

In the event of fire occurring, it is vital that staff and other persons are able to evacuate the premises. All existing doors through which a person may have to pass to vacate the premises must be capable of being easily and immediately opened from the inside. Staff will not block or otherwise obstruct exits provided for emergency evacuation.

Access routes must always be maintained unobstructed to their terminal exit doors (internal and final exits) sufficient to allow easy access by the number of persons likely to use those routes, (750mm minimum width) and employees must observe any line markers that indicate areas which must be kept clear.

Stairways in buildings must be free from any risk of fire or spread of fire, e.g., unauthorised portable heaters, combustible materials, e.t.c.

Under no circumstances should fire doors be wedged open, unless they are retained by automatic magnetic release systems or similar which are connected to or activated by the fire alarm system.

3.15 First Aid Arrangements

The First Aid Manager, on behalf of the Director Responsible for Health and Safety will ensure that the Company provides adequate emergency first aid provision, commensurate with the number of employees and the nature of the Company's business operations. The First Aid Manager will be responsible for managing First Aiders, maintaining adequate provision of first aid supplies and equipment, and providing first aid training and refresher training for First Aiders at the requisite intervals.

The names and contact details of First Aiders will be displayed on the Company notice board and on the Company telephone directory.

3.16 Guidance

The Company commits to operating to the very highest standards of health safety and will therefore carry out its operations in accordance with best practice as advised by the Health & Safety Executive, as well as various trade bodies and associations, where applicable. This best practise will be reviewed on an annual basis and adopted annually or when evidence that significant improvements can be made by earlier adoption.

The Company also commits to providing employees and contractors with health and safety guidance, in the form of employee communications, instruction leaflets, training, signage, and other appropriate forms of communication, with the intention of informing employees and contractors of the risks posed by the activities

they perform on behalf of the Company, and the behaviours required of them to minimise such risks.

3.17 Hand Arm Vibration Syndrome (HAV)

The company will ensure that staff are not subjected to excessive vibration through the use of power tools or other vibrating equipment. The Company will endeavour to source low-vibration tools and limit employee and contractor exposure to such tools. The Company will also provide adequate information, instruction and training, where applicable, to its employees and contractors on the risks of HAVS.

3.18 Health & Safety Records

All relevant health and safety records will be kept by the Health and Safety Manager, and where relevant, the Responsible Persons for Equipment, in written form. Such records will include:

- Equipment Inspections
- COSHH Assessments
- Generic Risk Assessments
- Staff Training and Induction Records
- Contract Start-up information
- Specific Risk assessments
- Method Statements and Safe Systems of Work
- Records of individual health and safety issues

The Accident Record Book will be kept by the Accident Reporting Contact or the Person Responsible for Accident Reporting.

3.19 Health & Safety Training

The Company will provide training and refresher training as is necessary to ensure, so far as is reasonably practicable, the health and safety of all staff.

Such training will be commensurate with the risks associated with each employee and contractor's, where applicable, role and duties.

Training will be provided to employees and contractors in the following instances:

- As part of the induction process for new starters
- Upon job transfer
- Upon the introduction of new equipment, machinery and vehicles
- Upon the introduction of new working practices
- Upon the relevant anniversary requiring refresher training

A record of health and safety training for each employee and contractor will be kept and maintained on the Company's online health and safety management system.

Induction Training

Every new employee will receive a safety induction upon commencing his/her employment. The training will address Fire Safety, Emergency First Aid, those health and safety areas applicable to all employees (such as, Manual Handling, Vehicles In and Around the Warehouse), together with other health and safety training applicable to his/her role and duties (such as, Avoiding Falls from Height, Safe Use of Conveyors). New employees will also be given instruction and safety training on the equipment they will be required to use whilst discharging their duties.

3.20 Health and Safety Responsibilities of Supervisors

The Company recognises that the effective implementation of and adherence to health and safety policy rests with the management and employees of the company. Employees with supervisory responsibility for others, whether they be directors, managers, supervisors or employees performing any other role encompassing people leadership, have key responsibilities regarding health and safety, as follows:

- have a good understanding of Company health and safety policy and the measures in place to uphold it
- understand the specific health and safety actions expected of them in their particular role
- have regard to health and safety in the course of their work activities, and those of their staff
- impress upon their staff, the need to abide by health and safety policy and procedures
- ensure they and their staff have received the health and safety training specifically associated with their roles
- know where to go for advice on matters pertaining to health and safety (i.e., the Health and Safety Manager)

3.21 Health Surveillance

All employees of the Company are encouraged to be attentive to their personal health, and any reported health problems will be dealt with by the Company in a confidential manner.

In the event that the Company have any concerns regarding the well being of any employee, they may request a referral to a professional occupational health provider and or, on request of an employee in matters relating to work related ill health issues, pay for any relevant medical surveillance deemed appropriate.

The Company understands the occupational health risks to employees, and commits to controlling such risks by various means, including regard to effective work process and targets, workstation assessments and health and safety inspections, reviews and assessments.

3.22 Lone Working

Where tasks need to be performed by employees or contractors working on their own, the Company will ascertain the procedures to be followed in case of emergency, e.g., lone worker injury, e.t.c., and details will be provided to all company employees and contractors required to work under such conditions.

3.23 Machinery Maintenance

All machines including power tools, jet wash equipment, saws, drills, power presses, compactors, balers, e.t.c., will be subject to regular inspection, according to manufacturer or legislative requirements. Damaged or unsuitable equipment and machinery will be withdrawn from service, immediately. All equipment and machinery will also be subject to maintenance and servicing, as per the manufacturer's instructions, with records held in either written or electronic format.

3.24 Machinery Operation

All employees and contractors who are required to operate machinery or plant will have the appropriate training and be assessed to determine their competency. Where required, the individual will hold a current license to operate such machinery or plant. It is Company policy to take severe disciplinary action against any person found to be operating machinery without the necessary competence or authority.

3.25 Manual Handling Assessments

All employees will receive basic training in manual handling. Where specific manual handling assessments highlight tasks or work practises that require specific manual handling training, the Company will provide such training to the relevant employees and contractors.

Where practical, manual handling will be avoided by utilising mechanical means to minimise the risks arising from manual handling.

Manual handling assessments will consider the load to be handled, e.g., stock, tools, equipment, materials, e.t.c., its size and weight, the individual, the task and the environment in which the task takes place. The assessment will also consider the possibility of kinetic lifting techniques to assist the movement of an object and to minimise the risks arising from manual handling.

3.26 Method Statements (Safe Operating Procedures)

Safe Working Practises (Method Statements) will be developed for those operations the Company deems appropriate. The overriding criteria for assessing such appropriateness will be the level of risk associated with the operation, as measured by the probability and severity of the risk.

Safe Working Practises will be developed jointly by the relevant Supervisor/Manager and the Health and Safety Manager, to ensure that they are robust in both an operational and safety sense.

3.27 Noise

Regular exposure to high noise levels can cause deafness and tinnitus. Noise assessments will be carried out whenever it is suspected that noise levels may rise above 80db(a), and hearing protection will be provided for all operatives likely to be affected. Information and advice on using hearing protection will be issued.

The wearing of suitable hearing protection will be enforced.

Where noise levels are at 85db (a) or above, where possible, the company will take measures to reduce the exposure of noise to its employees and contractors by means other than hearing protection.

3.28 PAT Testing

All portable electrical appliances will be tested in accordance with the regulations, at the recommended intervals, as may be necessary to prevent danger. It will be the responsibility of the relevant Responsible Person for Equipment to ensure that all equipment provided or accepted by the Company is suitable for the task.

Each employee or contractor must carry out a daily inspection of any equipment, prior to its use, and must immediately report any defect or suspected defect to his/her Supervisor/Manager, refraining to use the equipment until it has been tested and assessed as being safe by a competent person.

3.29 Personal Protective Equipment

The need for Personal Protective Equipment will be determined through risk assessment and will be provided by the Company free of charge. Where tasks or operations require the use of PPE, then it will be worn at all times.

The need for PPE for ad-hoc, amended or new tasks and operations will be determined by risk assessment. Standard Company PPE requirements for existing tasks are described in Appendix Z1 - Existing PPE Requirements.

Details of the correct PPE will be provided to those engaged in applicable tasks and operations on behalf of the Company.

No employee or contractor will be permitted to start work without the correct PPE and the necessary information, instruction and training to enable him/her to utilise the equipment correctly and without risks to safety and health. It is the responsibility of each Supervisor/Manager to monitor the use of PPE in areas under their control. Persons found to be persistently breaching PPE rules will be subject to disciplinary procedures, in line with the Company's disciplinary rules and process.

3.30 Pregnant Workers

The company recognises that pregnant workers are more vulnerable to injury and as such will carry out a specific risk assessment where an employee or contractor notifies them of a pregnancy. Such assessments will consider the person's duties, working environment, process metrics and working hours. Where it is deemed that a risk to the expectant mother or baby is present, suitable controls will be introduced to reduce that risk to an acceptable level.

3.31 Purchase Policy

The Health and Safety at Work Act as amended imposes duties upon the Company and those providing goods and services to the Company. Health and Safety legislation affects purchasing decisions, including the use of sub-contractors or out-sourced activities, the purchase of new or hired equipment, maintenance services and goods; but is not limited to such legislation as The Supply of Machinery (Safety) Regulations, as amended, The Provision and Use of Work Equipment Regulations (PUWER) and The Control of Substances Hazardous to Health Regulations.

When purchasing or hiring machinery or equipment, the Company will ensure it obtains the relevant information and instructions on its function and operation, including the appropriate safety features and certificates of compliance. All suppliers of services will be competent and trained. All users of equipment will receive suitable training and instruction before being allowed to use equipment. The equipment must be safe, meet all relevant UK supply directives and legislation, and be 'CE' marked; it will be maintained in line with current legal requirements, and manufactures/suppliers guidance or ACOPS ruling at the time of use.

3.32 Restricted Areas and Equipment

In order to minimise the potential for accidents, the Company restricts access to high risk areas and equipment to Authorised Persons, only. Such areas and equipment, and the Authorised Persons associated with them are detailed in the Authorised Persons list held by the Health and Safety Manager. Authorised Persons will be qualified, either through training, knowledge and/or specific competence.

Employees and contractors who are not Authorised Persons must obtain permission from the person responsible for the area or equipment, prior to entering or using any restricted area or equipment.

Restricted areas and equipment are as follows:

Areas and (Person Responsible)

- The roof of Exe Box (FM and H&S Manager)
- Workshops/Welding Bay area (Warehouse Manager)
- Main Electrical Switch Room (FM and H&S Manager)
- Boiler Room (FM and H&S Manager)
- Area above the Exe Box 1st Flr Offices (FM and H&S Manager)
- The external Pump Room (FM and H&S Manager)
- The external Valve Room (FM and H&S Manager)
- The external Server Room (IT Manager)
- The external Sprinkler Tanks (FM and H&S Manager)
- The Guardhouse (FM and H&S Manager)
- The Main Yard area, other than the perimeter (Warehouse Manager)
- The external Gas Meter Building (FM and H&S Manager)

Equipment

- Workshop fixed equipment and tools (Warehouse Manager)
- Grinders (Warehouse Manager)
- Welding gear (Warehouse Manager)
- Power Planer (Warehouse Manager)
- Loading Bay Baler (Warehouse Manager)
- Packaging Compactor (Warehouse Manager)
- Mezzanine Lift (Warehouse Manager)
- Forklift trucks [all variations] (Warehouse Manager)
- Starting/stopping of motorised conveyors (Warehouse Manager)
- The Fire Alarm panel and system (FM and H&S Manager)
- Intruder Alarm panels (FM and H&S Manager)
- Building Management System (FM and H&S Manager)

3.33 Risk Assessments

The Director Responsible for Health and Safety or their nominated deputy will prepare risk assessments for those tasks and operations performed during the Company's normal business. Such assessments will occur during an annual Health and Safety Audit (sub-divided by location and area, as necessary). For those areas identified as potentially carrying a significant risk of injury, either during or separate from the Health and Safety Audit, a separate, task-specific risk assessment will be conducted.

Risks identified during Health and Safety Audits and task-specific risk assessments will be minimised through the introduction of control measures.

Employees and contractors will cooperate fully with Health and Safety Audits, task-specific risk assessments, and the introduction of control measures, providing time, resource and information to ensure that such assessments and measures are implemented effectively, and in a timely manner.

3.34 Safety Audits and Monitoring

At regular intervals, on no greater than a biennial frequency, the Person Responsible for Health and Safety or their nominated representative will carry out a Health and Safety Audit of the Company's activities. The audit will consider the risks posed by the Company's activities, to its employees and contractors, and the remedial actions required to control such risks.

The Company may also engage the services of external Health and Safety professionals, from time to time, to provide a separate audit of its performance in carrying out its health and safety duties and responsibilities.

3.35 Serious or Imminent Danger

These procedures are in line with Regulation 8 of the current Management of Health & Safety at Work Regulations.

It is the policy of the company that no employee or contractor will be made to work in dangerous conditions without due regard to health and safety, and that all employees will be made aware that there are regulations and procedures regarding serious or imminent danger.

Employees and contractors will be reminded that they must not under any circumstances undertake work or instruct others to undertake work where there is a risk of imminent danger, without adequate controls, safety procedures, training and personal protective equipment being in place to minimise that risk.

The Company authorises any employee to remove himself/herself to a relative place of safety when he/she has reason to believe he/she is at serious risk of harm or in imminent danger. Work will not resume in that area until the risk has been minimised.

Some emergency events can occur and develop rapidly, thus requiring employees to act without waiting for further guidance, for example, in a fire. Employees must, on arrival at new sites, make themselves familiar with the emergency procedures, escape routes and location of fire fighting equipment, e.t.c., prior to commencing work.

Under no circumstances will work activities take priority over safety considerations.

3.36 Temporary Workers and Agency Alignment

The Company will align its health and safety activities with those of any agency providing temporary workers to the Company to ensure that such workers receive adequate levels of protection from any risk of injury posed by the Company's activities, and specifically, those tasks and operations being performed by temporary workers.

3.37 Transport & Company Vehicle Safety

It is the policy of the Company to only employ drivers who are competent.

Driver Approval and Competence

A person may only operate Company vehicles if he or she;

1. Has held a full UK license for a minimum of 2 years

2. Has not been disqualified from driving for drink and/or drug offences in the last 5 years nor has any prosecution pending
3. Holds the correct license for the type of vehicle being operated

Drivers must inform the Company of any circumstances that may lead them to being unfit for driving duties.

Drivers must inform the Company immediately they become aware of any pending prosecution for any driving offence, regardless of the vehicle in which the alleged offence was committed.

All drivers will be asked to provide details of their driving licence number, national insurance number and the Post Code registered on their driving licence, in order that annual checks may be performed on applicable vehicle licences and any penalty points registered.

3.38 Welfare

The Company will provide welfare facilities at a level commensurate with or higher than those proscribed by legislation. Such facilities will include:

- Sanitary conveniences, and where possible, separate facilities for men and women
- Washing facilities
- Drinking water
- Hot and cold running water
- Soap or other washing agents
- A means of drying hands
- Suitable seating for breaks and meal breaks
- Adequate changing facilities, where relevant work activities are performed
- Where practicable, rest facilities for pregnant women and nursing mothers

Welfare facilities will be kept clean and in good condition, with an adequate supply of materials.

3.39 Working at Height

Work at height means work in any place where, if precautions were not taken, a person could fall a distance liable to cause personal injury. You are working at height if you:

- work above ground/floor level where a fall is liable to cause personal injury
- could fall from an edge, through an opening or fragile surface or
- could fall from ground level into an opening in a floor or a hole in the ground

Work at height does **not** include a slip or a trip on the level, as a fall from height has to involve a fall from one level to a lower level, nor does it include walking up and down a permanent staircase in a building.

It is the policy of the Company to comply with the current Work at Height Regulations. Work at height will be avoided wherever possible, and where it cannot be avoided, suitable protection will be provided. It is the responsibility of the Supervisor/Manager in charge of the area or work activity to carry out a risk assessment, select the appropriate work equipment to access height, and ensure the appropriate safety measures are in place to prevent falls.

Only trained and competent staff will be allowed to work at height.

No employee or contractor is permitted to work at height, without informing their Supervisor or Manager.

3.40 Young Workers

A 'Young Person' is anyone under the age of 18 years. Within this policy, the phrases, 'Young Person' and 'Young Worker' are synonymous.

Risk assessments will be carried out in compliance with The Management of Health & Safety at Work Regulations, as amended, for all young persons. This includes young persons undertaking job experience working within the business. The Company will also heed the special provisions for Young People in the Working Time Regulations, relating to limits of hours of work, rest from work and annual holidays.

Young Workers are seen as being particularly at risk because of their possible lack of awareness of existing or potential risks, immaturity and inexperience.

The relevant Supervisor/Manager will therefore:

- Assess risks to Young Workers
- Take into account their inexperience, lack of awareness and immaturity
- Prohibit certain activities where higher risks are identified
- Not allow the young person to operate any machinery or equipment without proper supervision and training
- Provide training to ensure competence before allowing any unsupervised activity to be undertaken
- Provide suitable supervision at all times
- Not employ any person under the age of 14 years for any paid or unpaid employment

3.41 Z1 - Appendix 1 - Existing PPE Requirements

Where employees or contractors are uncertain as to the type, nature or rating of Personal Protective Equipment (PPE) required for a particular activity, they must seek the assistance of the Health and Safety Manager.

PPE must be kept in good working order, and replaced when no longer effective, either through wear and tear or through expiry.

The following PPE equipment must be worn at all times for the following tasks and operations:

Footwear

Background:

- Employees who are exposed to potential foot injuries are required to wear appropriate foot protection.
- The company will pay for appropriate footwear for affected employees to wear whilst at work, by giving the employee an allowance of up to £35 to spend on suitable footwear. Any amounts spent over and above the allowance will be paid by the employee.
- Failure to wear the required footwear may be grounds for disciplinary action.

Affected staff will be required to wear one of two types of footwear, as follows:

- **Safety shoes/trainers** (of S1P standard or above, which includes reinforced toe-caps and midsole protection) are required to be worn by all staff in the following areas/activities.
 - ◆ Picking areas
 - ◆ POS areas
 - ◆ Staff who regularly build shops in the field or in the showrooms (e.g., Territory Managers and Sales Representatives).

- **Safety boots** (of S1P standard or above, which includes reinforced toe-caps, midsole and ankle/Achilles protection) are required to be worn by all staff in the following areas/activities. This higher level protection is needed where pallets are being handled, extensively.
 - ◆ Bulk areas
 - ◆ Fixtures areas
 - ◆ Goods In areas
 - ◆ Goods Out/loading and unloading lorries areas
 - ◆ Forklift and pallet truck operators

General:

- Office staff entering the Warehouse must wear appropriate shoes (i.e., not open-toed, high heels etc).
- Self-employed operatives in the field are required to follow this policy.

Masks and Respirators

Paint Spraying - Masks or respirators of the correct type must be worn for all paint spraying activities where the substance is hazardous under COSHH regulations, such as chemical substances, gases, solvents, dust and sprays. This will be marked on the substance container. Particular attention should be given as to whether the substance contains volatile organic compounds (VOCs), where a mask or respirator of a sufficient rating will be required.

Workshop and Other Activities Producing Dust or Particulates - Masks or respirators of the correct type must be worn for all activities producing hazardous dust or particulates. The mask or respirator must be rated for the particulate size and composition.

Gloves

Work Involving Corrosive or Harmful Agents - Gloves of the correct type and with suitable resistance must be worn where employees or contractors work with corrosive or harmful agents.

Work Involving Harsh Materials - Sufficiently resilient gloves must be worn to protect against cuts, splinters and other injury to hands when employees or contractors are engaged in handling harsh materials. A harsh material is one likely to cause physical injury when handled.

Safety Goggles

Work Presenting an Risk to Eyes - Protective goggles or masks must be worn where tasks present a risk from chemical or metal splash, dust, projectiles, gas or intense light.

Safety Helmets

Work Presenting a Risk of Falling Objects - Employees and contractors must wear a safety helmet where there is a continuing risk of falling objects. Working in and around normal racking and shelving would not normally present such a risk.

Safety Harnesses and Arrest Gear

Working at Height - Where it is not possible to eliminate the risk of falling, employees must use a suitable fall protection system to minimise the consequences of a fall. Short duration tasks using ladders or access apparatus do not necessarily present a sufficient risk of falling to merit a fall protection system, but should be assessed to substantiate this on an individual task basis.

Work on Exe Box Roof - A safety harness with fall arrest capability must be worn when working on the roof of Exe Box, within the areas covered by the Roof Fall Arrest System safety wires.

Sign Off Sheet

I have read and understood the contents of this Safety Policy.

Anything I did not understand has been explained to me to my satisfaction.

I agree to follow the Safety Policy and understand that any instructions are provided for my safety and the safety of others.

Print Name

Signed

Date

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