



Managing Health & Safety in

# IC Transport (NW) Limited



## HEALTH & SAFETY POLICIES & RESPONSIBILITIES

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Policy created: September 2016  
Policy last updated: January 2025

## **Manual One - Health & Safety Policies & Responsibilities**

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# CONTENTS

Contents (this page)

## **Part 1: General Policy Information**

Company Description

Statement of General Policy

Executive Summary - Using the Policy Manual

## **Part 2: Responsibilities**

Employer Responsibilities

Employees' Safety Responsibilities

## **Part 3: Arrangements – Policies**

(Go to part 3 for current policies contents)

## **Part 4: Lloyds Reports**

(Go to part 4 for current reports)

## **Part 5: Review and Amendment History**

Manual One and CD-ROM Review and Amendment Record

# **PART ONE**

# **GENERAL POLICY STATEMENT & USER INFORMATION**

## COMPANY DESCRIPTION

## Part One – General Policy Statement & User Information

IC Transport (NW) Limited provides transport and storage solutions to a range of clients from premises in Manchester.

Clients can chose from a range of vehicle / trailer combinations required for their load and the work is sub-contracted out to third-party carriers, who operate on the company's behalf.

## **Part One – General Policy Statement & User Information**

## STATEMENT OF GENERAL POLICY

### General

IC Transport (NW) Limited recognises that complying with the Health and Safety at Work etc. Act 1974 (and regulations made under it) is a legal requirement, not a matter of choice.

### Our policy is to

- Prevent accidents and work-related ill health, so far as is reasonably practicable.
- Provide adequate resources to control health and safety risks arising from work activities.
- Maintain safe and healthy premises, provide and maintain plant, machinery and equipment, and ensure safe storage, handling and use of substances.
- Ensure systems are in place to properly assess risk, maintain, monitor and, where necessary, improve safety and health performance throughout all areas of our activities.
- Implement emergency procedures in case of fire or other significant incident.
- Ensure there is adequate first aid provision and report incidents required by law.
- Provide sufficient information, instruction and training to ensure employees are competent to carry out their work.
- Ensure there is adequate supervision commensurate with risk and complexity of task.
- Properly communicate and consult on health and safety matters at all levels of the business.
- Work closely with contractors, suppliers and other stakeholders to ensure adequate levels of health and safety performance are achieved and maintained.

### Review

This policy, and the way it is operated, will be reviewed annually or more often if the business changes in nature and size or we believe it is no longer valid

Any revisions made to improve safety performance will be effectively communicated to employees and all other interested parties.

Name: Marc Cole (Director)

Signed:

Date:



## EXECUTIVE SUMMARY

### Using your policy manuals - overview

This policy system is comprised of two manuals; each structured to assist the organisation to implement, manage, monitor and review its health and safety performance:

#### Manual 1 – Health and Safety Policies and Responsibilities

#### Manual 2 – Risk Assessment and Hazard Monitoring

A CD-ROM containing practical health and safety guidance information and useful forms provides additional support to your manuals structure.

### Leading and managing for health and safety

The key point is that to lead health and safety successfully, directors have to do a whole lot more than simply sign off policies and budgets.

They need personally to become immersed in some of the challenges of running a safe and healthy operation.

Directors and senior managers who do not prioritise health and safety and who fail to take action to enable their colleagues to manage safely, create conditions in which unsafe and unhealthy systems of work go unchallenged and people are damaged or killed as a result.

In other words, top management must provide a clear message on the objectives and direction given to safety.

Moving from 'having safety in mind' to safety as a core value is where it all starts.

To achieve success, it's important to treat health and safety management as an integral part of good management generally, rather than as a stand-alone system.

Adopting the 'Plan, Do, Check, Act approach (see box below) can help you achieve a balance between the *systems* and *behavioural* aspects of management.

## Part One – General Policy Statement & User Information

### Plan, Do, Check, Act in a nutshell

PDCA	Actions
<b>Plan</b>	Determine your Policy; outline your strategy for managing safely - be clear what you want to achieve, when and how; lead by example; allocate responsibilities and resources; forward plan to implement it.
<b>Do</b>	Conduct risk assessments; decide what controls are needed; prioritise which should be implemented first, then put them in place; provide the right tools and equipment and maintain them; organise activities - build in control, cooperation and communication systems; inform, train and supervise workers; develop positive attitudes, behaviours and competence levels; implement your arrangements; keep your records up to date.
<b>Check</b>	Measure your performance – make sure that your plan has been properly implemented; check how well risks are being controlled and if you are achieving your aims; monitor <i>before</i> incidents, investigate <i>after</i> accidents and near misses.
<b>Act</b>	Review your performance; learn from accidents, ill health incidents and other relevant experiences; revisit your plans, policy documents and risk assessments to see if they need updating; take action on recommendations from any internal/external inspection reports.

### Putting it all into practice

Firstly, know what your own and your employees' health and safety responsibilities are.

Knowing and putting into practice these responsibilities will help you develop an effective approach to safety management.

Assess and prioritise your risk profile i.e. the activities identified through your risk assessment process to be eliminated or adequately controlled ranked in order of priority for action; focus on the significant risks, not the trivial. The importance of getting this right cannot be overstated - failure to do this will present a real threat to personal safety, and to the business as a whole.

Find out what laws, guidance and standards you will need to follow; what training is required for workers, types of equipment and activities; any health surveillance requirements; which forms/records you will need to use, what they are for, and when to complete and review them.

Learn lessons and take action accordingly; look for common factors when things go wrong - including human factors as well as systems failures – and opportunities for retraining.

Decide how you intend to measure (monitor) performance, how often, and who will do it.

The Plan, Do, Check, Act cycle

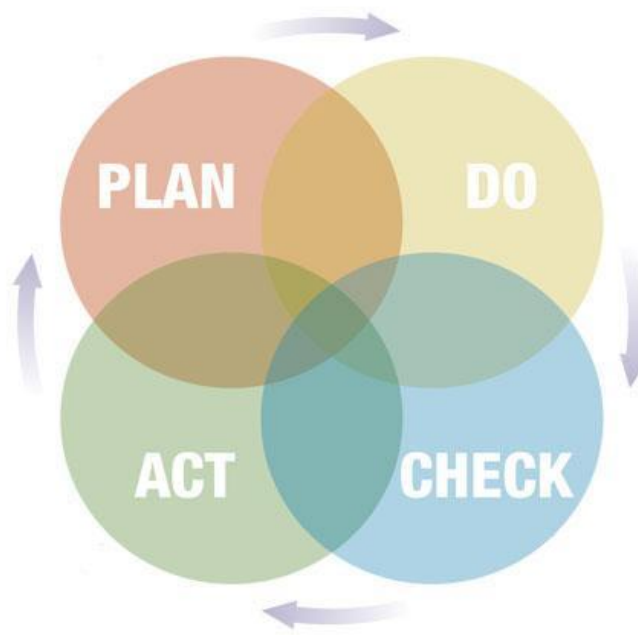


Diagram via HSE

This Policy and its revisions must be brought to the attention of all your staff and others affected by what you do; this is a legal requirement.

If your company fails to meet its legal duties, then a legal team will struggle to offer much in the way of defence.

Many prosecutions brought by the enforcing authorities would not make it to court if the organisation had actually done what it said it would.

This is also true when it comes to civil claims, as many people are awarded compensation because companies aren't able to prove they've done what's required of them.

It's also sometimes the case that although a business has 'ticked all the legal boxes' and has policies, procedures, risk assessments etc, it then failed to manage the system correctly.

Investigations show that often what's written down bears very little resemblance to what actually happens on 'the shop floor.'

For example, a risk assessment may state that staff will be trained, authorised and supervised, and records will be kept to show this is the case.

But, when there's an inspection – or worse, an accident - it becomes clear that no training had been provided, staff haven't been authorised and supervision levels aren't what they should be.

To make matters worse, there are often no records or other evidence to suggest staff have actually been made aware of the risk assessment significant findings and the appropriate safe working procedures.

Therefore, don't prepare the paperwork and then leave it on the shelf – brief your staff and ensure that they understand what's required of them.

## Part One – General Policy Statement & User Information

Implement review and other inspection findings and monitor them on a regular basis.

Your Manual One Responsibilities (changes) Section, names individuals and identifies what responsibilities they have; check it regularly to see if it needs updating, as many businesses have been caught out because the named individual has left and their duties haven't been reassigned.

Good health and safety management is analogous to a seamless robe; it has a beginning, but no end – you need to keep checking it to ensure it is still in good condition, meets your needs and provides the protection you require.

It's worth remembering that the Policy Manual is just that - a manual! It can't manage health and safety by itself – *trained and competent people* must do that.

It is most important to recognise that criminal and civil courts and visiting inspectors often seek proof of actions to prove compliance. Failure to produce appropriate documentation could be extremely costly.

Finally, if you are unsure of any H&S procedure, ask! Help is at hand by contacting your LELC consultant for advice and support.

### Contact, comments and complaints

If you have any questions about what is covered in your service, or any comments or concerns about it, please contact the Health and Safety Operations Manager.

Please do tell us - we cannot do anything about your concerns if we do not know about them.

It should be noted that if the procedures and guidance contained in this manual are not implemented it may invalidate any guarantee or insurance provided by LELC.

Also there may be employment law implications to be considered when implementing any changes.

Lloyds Employment Law Consultancy may be contacted on:

Tel: 0844 7700 656 / 01476 583250

Fax: 0844 7700 657 / 01476 583281

Email: [healthandsafetylaw@lelc.co.uk](mailto:healthandsafetylaw@lelc.co.uk)

# **PART TWO**

# **RESPONSIBILITIES**

# CONTENTS

[Employer Responsibilities](#)

[Employees Safety Responsibilities](#)

## RESPONSIBILITIES

### Main duty holder

Overall and final responsibility for health and safety within the organisation is that of

The Director – Marc Cole
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You also have the day-to-day responsibility for ensuring this policy is put into practice.

You are the duty holder for the topics listed below.

Should you decide, however, to delegate any of these responsibilities to other employees within the organisation, annotate their name, job title and date appointed in the box alongside each responsibility.

You must ensure that they are competent to undertake the tasks, that they fully understand what the duties entail and, where necessary, provide appropriate training and resources.

You should also ensure that there are effective mechanisms in place so that any health and safety concerns can be reported quickly back to you for action.

Employees also have legal responsibilities to take care of their own health and safety and that of others who may be affected by their work activities.

They must cooperate with you to help you comply with the law, and they must follow instructions and training.

**Important note:** Although you can delegate responsibilities to others, you cannot abrogate your duty under health and safety law - this remains your responsibility.

## Part Two - Responsibilities

### Day-to-Day Responsibilities

Topic	Responsibility/Action	Name & Job Title	Date Appointed
<b>Accidents &amp; RIDDOR</b>	<p>Record and investigate all accidents. Maintain an accident recording system which is suitably protected to ensure compliance with the Data Protection Act.</p> <p>Report all injuries, diseases or dangerous occurrences to the HSE that fall within the RIDDOR criteria.</p>	Marc Cole	August 2016
<b>Consultation &amp; Communication</b>	<p>Ensure communication of the Health &amp; Safety Policy and other applicable safety information is effective and working in practice.</p> <p>Implement a consultation process with all employees aimed at promoting, developing and sustaining a positive culture at work.</p> <p>Ensure there is a two-way process in place that allows workers to raise concerns and influence decisions on the management of health and safety.</p>	Marc Cole	August 2016
<b>Contractors</b>	<p>Source competent contractors and check that they work in a controlled and safe way – take account of any CDM 2015 duties that may be applicable to you.</p> <p>Ensure adequate communication of works and risk controls between all relevant employees and non-employees are in place.</p> <p>Control agency/temporary workers employed by the company.</p>	Marc Cole	August 2016
<b>Fire Safety</b>	<p>Ensure a fire risk assessment has been carried out, is up-to-date and the fire risk is properly managed with relevant emergency procedures / notices and signage properly displayed.</p> <p>Ensure fire detection and warning systems, emergency lighting and fire fighting appliances are provided, tested and maintained at the relevant timescales.</p> <p>Keep all records up-to-date.</p>	Marc Cole	August 2016



## Part Two - Responsibilities

Topic	Responsibility/Action	Name & Job Title	Date Appointed
<b>First Aid</b>	<p>Make sure there is always (as a minimum) a suitably stocked first-aid box, an appointed person to take charge of first-aid arrangements and information for all employees giving details of the first-aid arrangements.</p> <p>Make sure personal accident record details are stored confidentially in a secure place.</p>	Marc Cole	August 2016
<b>Health Hazards (Physical)</b>	Ensure that physical hazards, such as manual handling, noise, vibration and workplace ergonomics are assessed and adequately controlled.	Marc Cole	August 2016
<b>Health Hazards (Substances)</b>	<p>Check new chemicals/substances are as low a risk as possible before purchase.</p> <p>Manage safe exposure to chemicals or substances (including flammables, gases, asbestos, lead, etc).</p> <p>Identify any substances that need assessment (see 'Risk Assessment'), ensure that adequate control measures are implemented <i>prior</i> to exposure.</p>	Marc Cole	August 2016
<b>Health Surveillance</b>	Ensure that where risk assessment shows health surveillance is required, it is implemented, monitored, reviewed and properly recorded.	Marc Cole	August 2016
<b>Personal Protective Equipment (PPE)</b>	<p>Provide appropriate PPE (and ensure it is used) where risk assessment has shown it to be a necessity.</p> <p>Train workers in its use, maintenance, cleaning, storage, defect reporting and replacement. Keep a record of issue/return.</p>	Marc Cole	August 2016
<b>Plant &amp; Utilities</b>	<p>Ensure that all utility supplies, plant and fixed equipment that requires maintenance and statutory examination and inspection has an appropriate schedule in place.</p> <p>Ensure there is an effective fault reporting process in place.</p> <p>Keep records as appropriate.</p>	Marc Cole	August 2016

## Part Two - Responsibilities

Topic	Responsibility/Action	Name & Job Title	Date Appointed
<b>Premises Maintenance</b>	<p>Maintain the company premises in a structurally sound and safe condition. Check that any external workplaces visited by employees are similarly maintained. Provide sufficient welfare facilities, including clean and hygienic washing and toilet facilities. Ensure suitable provision of lighting, electricity, water, heating and ventilation.</p> <p>Effectively monitor housekeeping and general workplace tidiness and ensure pedestrian and escape routes are kept unobstructed and in good condition at all times.</p>	Marc Cole	August 2016
<b>Risk Assessment</b>	<p>Ensure risk assessments are carried out covering the tasks and activities carried out by the company, and that action required to remove/control risks is implemented.</p> <p>Provide adequate information in a comprehensible format to workers so that agreed safe working practices are understood.</p> <p>Monitor controls to confirm that they are working in practice.</p> <p>Review the assessments on an on-going basis to make sure they stay up to date, particularly when there are significant work changes, after accidents/incidents, or workers have reported a problem.</p>	Marc Cole	August 2016
<b>Safety Standards Monitoring</b>	<p>Ensure safety standards are monitored so they can be maintained or, where found to be deficient or falling, improved upon.</p>	Marc Cole	August 2016
<b>Supervision</b>	<p>Ensure that sufficient, competent supervision is provided to influence employee behaviour and to maintain good / safe working practices - particularly where new, young or other inexperienced or vulnerable workers are employed.</p>	Marc Cole	August 2016

## Part Two - Responsibilities

Topic	Responsibility/Action	Name & Job Title	Date Appointed
<b>Training</b>	Ensuring that adequate induction training is provided, supported by up-to-date job specific and refresher training as appropriate. Monitor training needs and keep records of training.	Marc Cole	August 2016
<b>Vehicles (Cars and/or Commercial)</b>	<p>Ensure that vehicles used are legal, properly maintained, insured, taxed and suitable for their expected use. Implement controls so that drivers' are managed to maintain their competency and fitness to drive.</p> <p>Ensure there is adequate segregation between pedestrians and vehicles on site at all times.</p>	Marc Cole	August 2016
<b>Work Equipment</b>	<p>Ensure there are effective procedures in place to maintain, operate, and keep in efficient working order, all work equipment – i.e. machinery, tools, access equipment, storage systems, IT equipment, furniture, etc.</p> <p>Check that new or second hand equipment meets current health and safety standards prior to purchase.</p> <p>Ensure there is an effective fault reporting process in place.</p> <p>Keep records as appropriate.</p>	Marc Cole	August 2016

## ALL EMPLOYEES' SAFETY RESPONSIBILITIES

### Think! About safety

Your safety, health and welfare are of great importance to us.

These two pages represent the first stage in raising your awareness of, and developing your skills in the company's health and safety culture.

You may also have additional responsibilities, relevant to your role within the company.

Each year, many thousands of workers have accidents at work that they thought would never happen to them. There is no shame in trying to avoid being one of this year's statistics!

Most accidents are entirely preventable. Therefore, please ensure **you** do everything you can to prevent accidents.

Always bear in mind that someone may be looking at the way you do things, so set a good example. Don't let **your** bad example contribute to yours or someone else's accident.

Remember too, that safe behaviour doesn't end at work – think about safety when you are at home. If you have an accident at home, you would be just as injured as if you had done it at work, so do think about safety.

This information highlights some of the significant risks that you should guard against at all times. It is by no means a complete list of possible dangers in the workplace – other risks will be brought to your attention as part of your on-going training and development.

So in your day-to-day work activities please:

## THINK! ABOUT SAFETY

### A summary of your responsibilities

As an employee, you have a legal duty to exercise personal responsibility to do everything possible to prevent injury to yourself and others affected by your actions.

Therefore, no employee of the company – regardless of position within the organisation, may carry out or authorise practices which place workers or others in danger, or which are in direct breach of legal requirements.

This means you must follow the requirements of the company Health and Safety Policy and comply with the duties of employees within the Health and Safety at Work Act and supporting regulations.

A simple interpretation of *your* legal duties at work can be summarised as:

- To take reasonable care of *your own* health and safety
- Not to put at risk the health and safety of *any other* person
- To cooperate fully with your manager *or* any other person with responsibilities relating to health and safety.

Therefore, what you **must** do is:

## Part Two - Responsibilities

✓ <b>Think</b>	About whatever task you are about to carry out... identify any hazards (dangers) and take steps to minimise the risk (chance) of causing an accident.
✓ <b>Remember</b>	To apply your training.
✓ <b>Listen</b>	To your supervisor / manager's instructions.
✓ <b>Follow</b>	All verbal or written safe working procedures.
✓ <b>Obey</b>	All safety signs and notices. Look at the Health and Safety Law Poster and know and understand what it means - this is displayed:
✓ <b>Wear</b>	Any personal protective equipment (PPE) <i>and</i> use it correctly. Inform your manager if PPE is lost, worn or defective.
✓ <b>Report</b>	All accidents and injuries <i>however minor</i> without delay, and ensure the injury has been entered in an accident record. Inform your manager of any damaged or defective machinery, tools, or other equipment.
✓ <b>Maintain</b>	Good 'housekeeping' standards in your work area at all times. Keeping <i>your</i> workplace clean and tidy, will reduce the risk of fire, slip, or trip injuries to you or someone else.
✓ <b>Comply</b>	With the company smoking policy at all times.

And what you must **not** do:

✗ <b>Operate</b>	Equipment or vehicles you have not been trained <i>and</i> authorised to use.
✗ <b>Intentionally</b>	Damage, interfere with, or misuse anything provided for health and safety purposes. Such as, for example: fire appliances, guards and other safety devices on machinery, fuses in plugs, PPE, etc. To do so can be a criminal offence under health and safety law.
✗ <b>Consume</b>	Alcohol or take drugs (this includes 'legal highs'), or any other illegal substances, whilst at your place of work.
✗ <b>Take</b>	Shortcuts or indulge in horseplay that creates unnecessary risks.

**Remember:** Preventing accidents is often a matter of applying sound common sense, so don't let a lack of it catch **YOU** out! If in doubt about any task, always **ASK!**

### IMPORTANT NOTE

**A breach of these responsibilities, or any other policies, rules or instructions may result in disciplinary action being taken.**

[Return to index](#)

# **PART THREE**

## **ARRANGEMENTS - POLICY STATEMENTS**

## CONTENTS

### POLICIES

[Accident Reporting and Investigation](#)  
[Alcohol and Drugs](#)  
[CDM 2015 \(Commercial Client\)](#)  
[Consultation with Employees](#)  
[Contractors \(Non CDM\)](#)  
[Display Screen Equipment \(DSE\)](#)  
[Electricity](#)  
[Fire](#)  
[First Aid](#)  
[Flammable and Explosive Substances](#)  
[Hazardous Substances](#)  
[Housekeeping Standards](#)  
[Lone Working](#)  
[Manual Handling](#)  
[Migrant Workers](#)  
[Personal Protective Equipment \(PPE\)](#)  
[Risk Management](#)  
[Smoking](#)  
[Stress](#)  
[Training](#)  
[Vehicles at Work](#)  
[Violence at Work](#)  
[Visitors](#)  
[Working Abroad](#)  
[Work at Height](#)  
[Work Equipment](#)

## ACCIDENT REPORTING AND INVESTIGATION POLICY

### Overview

The company recognises that there are legal duties to report specified injuries, diseases and dangerous occurrences, and that it makes good moral, legal and financial sense to investigate accidents and incidents to identify what went wrong and determine what steps must be taken to prevent it happening again.

### It is our policy to:

- Record all employee injuries in the Accident Book and instruct staff on the correct procedure to be followed.
- Keep records of all accidents and incidents involving non-employees occurring on our premises, or as a part of our undertaking including details of their status, e.g. visitor, contractor, member of the public, etc.
- Ensure that where required, incidents reportable under RIDDOR are done so within the statutory reporting period via the HSE website or alternatively (for fatal and specified injuries *only*) to the Incident Contact Centre (ICC).
- Maintain records of occupational ill health where appropriate.
- Thoroughly investigate accidents, including serious 'near-miss' incidents to prevent a recurrence and learn lessons where relevant, using the following steps:
  - ☐ Gather information.
  - ☐ Analyse the information.
  - ☐ Identify suitable risk control measures.
  - ☐ Implement an appropriate action plan.
  - ☐ Monitor its effectiveness.
- Revise risk assessments where necessary via feedback from the investigation process above.
- Inform all appropriate personnel of the outcome/actions to be taken.

[Return to index](#)

### Principal legislation

Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013 (RIDDOR)  
Health and Safety (First Aid) Regulations 1981 (as amended)  
Management of Health and Safety at Work Regulations 1999



## ALCOHOL AND DRUGS POLICY

### Overview

Our aim is to provide a safe and healthy working environment for all employees, contractors and visitors.

We recognise that if we knowingly allow an employee under the influence of alcohol and/or drugs to continue working and this puts the employee and/or others at risk we, as the employer, can be liable to prosecution.

For the purpose of this Policy, illegal drugs are those substances for which no prescription has been obtained.

### It is our policy to

- Inform our employees and, where appropriate, contractors working on our behalf, that they must not arrive for work under the influence of alcohol or consume alcohol - on or off the premises - during working hours. ('At work' also includes the driving of, or being in charge of, vehicles used on company business)
- Ensure our employees understand that the use of illegal drugs, misuse of prescribed/legal drugs or other medications, and the taking of alcohol, can lead to unacceptable risk both to those under the influence, and those affected by them
- Inform all employees that if they are prescribed medication, they must check with their GP or healthcare professional that the medication will not affect their ability to work or drive safely
- Ensure that employees understand the relationship between taking prescribed drugs, the legal limits in force for specified prescription drugs and being impaired whilst driving – whether above or below the prescribed limits - which could result in their arrest
- Report any occurrence of the supply, selling or possession of illegal drugs to the Police
- Inform employees that being convicted of an alcohol or drug related crime must be reported to the company at the earliest opportunity
- Make clear that if an employee comes to work whilst under the influence of alcohol, or otherwise consumes alcohol either on or off the premises during their shift in breach of this Policy, it will result in the disciplinary process being instigated. This may lead to summary dismissal on the grounds of gross misconduct
- Notwithstanding the above, where an employee informs the company in confidence that they have an alcohol or substance abuse problem, we will encourage and support them in seeking appropriate counselling and treatment

[Return to index](#)

### Principal Legislation

Health and Safety at Work *etc.* Act 1974 (HSWA)

Management of Health and Safety at Work Regulations 1999

Equality Act 2010

Road Traffic Act 1988

Drug Driving (Specified Limits) (England and Wales) (Amendment) Regulations 2015

## CDM 2015 [COMMERCIAL CLIENT] POLICY

### Overview

We recognise that we have a legal duty to conduct our undertaking in such a way that persons not in our employment - such as contractors (and those employed by them – including the self-employed), are not exposed to injury or ill health.

We acknowledge that CDM 2015 applies to all ‘construction work’ which means the carrying out of any building or civil engineering construction such as new build, demolition, dismantling, refurbishment/fitting out, extensions, conversions, general repair, and includes some less obvious types of work such as commissioning, renovation, decoration, assembling pre-fabricated structures, high pressure cleaning and maintenance work on fixed installations such as gas, electrical or IT/telecommunications.

We also recognise that CDM 2015 brings within its scope new and enhanced obligations on clients and other duty holders (our other CDM policies refer as appropriate).

### It is our policy to:

Prior to contractors or their sub-contractors being employed to carry out work for us, we will ensure that they are given clear information of hazards likely to be encountered, including areas where there may be specific dangers, or which must not be entered unaccompanied.

For those projects we undertake as client with only *one* contractor we will ensure:

- That the work required is clearly specified.
- References are taken up wherever practicable.
- Workers have the right skills, knowledge and experience (SKE).
- The contractor provides appropriate information, instruction, training and supervision.
- A written construction phase plan (CPP) is produced (proportionate to project complexity).

Where a project involves *two or more* contractors, we will ensure all of the above *and*:

- A principal designer (PD) and principal contractor (PC) is appointed
- A health and safety file is produced.

Where work is scheduled to last longer than 30 working days AND have more than 20 workers working simultaneously at any point in the project OR exceeds 500 person days, we will ensure all of the above is in place and, as client, we will notify the project to the Health and Safety Executive (HSE).

In addition, we make sure that there are appropriate arrangements for staff welfare; this includes toilets and an area to take breaks.

Monitor contractors’ activities to ensure the agreed procedures are followed in practice.

[Return to index](#)

### Principal legislation

Construction (Design and Management) Regulations 2015 (CDM)  
Management of Health and Safety at Work Regulations 1999  
Workplace (Health, Safety and Welfare) Regulations 1992 (as amended)  
Health and Safety at Work *etc.* Act 1974 (HSWA)

## CONSULTATION WITH EMPLOYEES POLICY

### Overview

We recognise that effective consultation and communication between employees and management at all levels, is an essential step in promoting and maintaining a positive corporate health and safety culture.

#### It is our policy to:

- Expect management at all levels to encourage and cultivate methods of cooperation, consultation and communication between the company and all its employees.
- Promote and implement effective measures to improve good health and safety performance.
- Investigate all complaints made by employees who have concerns relating to their health or safety at work.
- Implement a process that informs employees that where an individual has concerns regarding his or her own health, safety or welfare they shall, in the first instance; raise the matter with their immediate manager or supervisor.
- Implement a process that informs employees that where a concern relates to a group of employees, a nominated representative for that group shall raise the matter with the manager or supervisor directly responsible for the day-to-day operations within that area.
- Recognise that whilst line managers will deal with any issues raised as soon as is reasonably practicable, it may be necessary for further investigation and/or consultation to be carried out.
- Ensure that in circumstances where an immediate action or decision cannot be taken, all interested parties will be kept informed of progress being made within a reasonable time period.
- Accept that adherence to this policy does not, in the event of a failure to reach a mutually agreeable conclusion, preclude an employee seeking remedy through the company's formal grievance procedure.

[Return to index](#)

#### Principal legislation

Health and Safety at Work *etc* Act 1974 (HSWA)  
Management of Health and Safety at Work Regulations 1999  
Health and Safety (Consultation with Employees) Regulations 1996  
Safety Representatives and Safety Committees Regulations 1977  
Regulatory Reform (Fire Safety) Order 2005 (FSO)  
Construction (Design and Management) Regulations 2015 (CDM)

## CONTRACTOR [NON-CDM] POLICY

### Overview

We are committed to ensuring that contractors (including the self-employed) carrying out work for the company are not exposed to injury or ill health.

#### It is our policy to:

Prior to contractors starting work for us we will ensure that they are given clear information of hazards likely to be encountered, including areas where there may be specific dangers, or which must not be entered unaccompanied.

Effectively communicate and cooperate with contractors to ensure their activities do not put our employees and other persons on our premises at risk from their activities.

Check that contractors' work is properly planned, organised, and where necessary supervised, and then monitor their activities to ensure the agreed procedures are followed in practice.

Before employing a contractor, the following procedure will be implemented:

- Clearly specify what work is required.
- Take up references wherever practicable.
- Use only approved, qualified, trained and competent contractors, and carry out reasonable checks to ascertain they hold appropriate and current insurances.
- Obtain risk assessments and associated control measures proportionate to the task, including creating or reviewing our own risk assessments and procedures where relevant.

**Note:** In this Policy 'contractor' refers to non-CDM work and relates to other areas of contracted out activities, such as:

- General cleaners/window cleaners.
- Service/maintenance/IT engineers/catering.
- Temporary/agency workers, etc.

[Return to index](#)

#### Principal legislation

Management of Health and Safety at Work Regulations 1999  
Workplace (Health, Safety and Welfare) Regulations 1992 (as amended)  
Regulatory Reform (Fire Safety) Order 2005 (RRFSO)  
Health and Safety at Work *etc.* Act 1974 (HSWA)

## DISPLAY SCREEN EQUIPMENT (DSE) POLICY

### Overview

The company recognises that workers using DSE can suffer avoidable postural and visual problems, fatigue and stress, if risks are not adequately controlled.

#### It is our policy to:

- Ensure, as far as is reasonably practicable, that the use of DSE on company business does not cause adverse health conditions or significant risk of injury.
- Identify users or operators, and those about to become users – this includes not only those whose normal work is to habitually use DSE at company workstations, but also homeworkers and laptop/tablet/iPad and other handheld computer system users.
- Analyse workstations, laptops and hand-held devices (such as tablets etc.) to ensure they meet the minimum standards as set out in the DSE Regulations.
- Carry out a risk assessment of people's work using competent personnel to assess the suitability of:
  - ❑ Display screen, keyboard, mouse, peripheral equipment and software.
  - ❑ Chair, desk, work surface, workspace and tripping hazards.
  - ❑ Lighting, reflections/glare, noise, heat, humidity and overall workstation suitability and comfort.
- Provide adequate breaks from on-screen activity.
- Provide adequate health and safety information and training not only for those already using DSE, but also those about to start using such equipment.
- Provide and pay for users eye and eyesight tests, and special corrective appliances (where needed for screen-viewing distance), if requested.
- Review the assessments if a major change occurs to the workstation, equipment or software, or the workstation is relocated.
- Encourage all users of DSE to report any concerns they may have about equipment, desks, chairs, work methods, environment, etc. or, any health problems believed to be related to their work.

[Return to index](#)

#### Principal legislation

Health and Safety (Display Screen Equipment) Regulations 1992 (as amended) (DSE)  
Workplace (Health, Safety and Welfare) Regulations 1992 (as amended)  
Electricity at Work Regulations 1989  
Provision and Use of Work Equipment Regulations 1998 (PUWER)  
Management of Health and Safety at Work Regulations 1999

## ELECTRICITY POLICY

### Overview

We recognise that faults in electrical wiring systems and portable appliances account for a significant amount of fires in premises, and can also lead to electric shock resulting in burn injuries, or fatalities.

#### It is our policy to:

- Identify and manage the risks associated with the fixed wiring installation, portable electrical appliances and other sources of electricity, e.g. static.
- Ensure our fixed wiring installation is subject to formal inspection and test by a competent person at periods advised by the competent person.
- Seek competent advice before making any changes to the electrical installation.
- Subject all portable electrical appliances – including extension cables, fixed or transportable electrical plant and machinery to routine inspection e.g. pre-use ‘user’ checks and a more formal inspection and test regime by a trained, competent person at intervals identified from risk assessment, coupled to recommended industry guidance.
- Where practical, use cordless, rechargeable, hand-held power tools, or equipment operating at 110V with a working RCD protector in the circuit.
- Protect all hazardous installation components from unauthorised access or tampering by secure coverings/access panels and providing clear signs indicating danger.
- Train personnel to ensure they know how to avoid electric shock, potential fire situations and how to report damaged or defective equipment promptly.
- Emphasise the importance of visual checks, as tests only record the condition of equipment and wiring at that *particular point* in time of the test.
- Ensure only approved electrical equipment is brought onto the premises or used for company business.
- Keep an appropriate record of all training, maintenance and inspection and test programmes and activities.

[Return to index](#)

#### Principal legislation

Electricity at Work Regulations 1989

Management of Health and Safety at Work Regulations 1999

Provision and Use of Work Equipment Regulations 1998 (PUWER)

Building Regulations 2000 Part P (as amended)

## FIRE POLICY

### Overview

The company, through the Responsible Person (RP), recognises that fire safety is a key part of good business management, and it is therefore our objective to focus on appropriate fire prevention and protective measures, underpinned by a suitable and sufficient fire risk assessment process.

### It is our policy to:

- Undertake a fire risk assessment in order to evaluate the risks from fire and explosion to people and premises and keep it up-to-date.
- Implement measures for fire protection and prevention, including management arrangements to plan, organise, control, monitor and review fire safety measures.
- Take additional measures as appropriate to ensure fire safety where flammable or explosive materials are used, produced, stored, or transported.
- Consider who may be especially at risk; for example, persons who may have a disability, or who may need other special help.
- Provide fire fighting equipment, an adequate means of raising the alarm and fire detection equipment where appropriate.
- Provide unobstructed and adequately illuminated escape routes, signage and fire assembly point.
- Maintain facilities and equipment in good repair and working order.
- Draw up appropriate general precautions and a fire plan.
- Inform employees and others about fire risks and the necessary precautions.
- Where required, provide specific fire training - taking into consideration the workers' capabilities as regards health and safety when entrusting tasks to them.
- Test (sound) the alarm weekly, and carry out practice evacuation drills at least annually.
- Keep records of tests, drills, equipment maintenance and training.
- Where appropriate, appoint one or more Competent Persons (CP) to assist the RP in implementing the above arrangements.

Additional fire arrangements information is contained in the Company Fire Manual.

[Return to index](#)

#### Principal legislation

Regulatory Reform (Fire Safety) Order 2005 (FSO)

Fire Safety (Employees' Capabilities) (England) Regulations 2010

# FIRST AID POLICY

## Overview

The company recognises that by providing adequate first aid facilities, equipment and personnel, we may reduce the immediate impact of injuries and/or ill health that occur in the workplace.

### It is our policy to:

- Commensurate with our risk-based needs, appoint and train suitable numbers of first aid personnel. There may be a combination of skill levels i.e.:
  - ☐ Certificated First Aid at Work (FAW) – higher skill level, and/or;
  - ☐ Certificated Emergency First Aid at Work (EFAW) – lesser skill level, and/or;
  - ☐ Non-certificated Appointed Persons (instead of a certificated first aider) where the risk is low, or to provide temporary emergency cover if certificated personnel are absent due to unforeseen circumstances.
- Determine our first aid needs, by considering in the assessment:
  - ☐ Workplace hazards and risks – including any specific or non-routine risks.
  - ☐ The company's accident history.
  - ☐ Likely distribution of the workforce, such as remoteness from emergency assistance, travelling, working on other sites, lone workers, etc.
  - ☐ Annual holidays, courses and other planned absences of first aiders / appointed persons.
- Identify and select a competent training provider to deliver our first aid training based on the needs assessment findings and appropriate due diligence checks.
- Provide and maintain adequate first aid facilities, equipment and signage.
- Maintain a Data Protection Act (DPA) compliant company accident record book (see also our Accident Reporting and Investigation Policy).
- Inform our employees of what first aid arrangements are in place.
- Clearly display the location and names of first aid personnel, along with appropriate and clear procedures for reporting accidents, obtaining treatment, summoning an ambulance, or taking injured personnel to hospital.

[Return to index](#)

### Principal legislation

Health and Safety (First Aid) Regulations 1981 (as amended)  
Management of Health and Safety at Work Regulations 1999  
Health and Safety at Work *etc.* Act 1974 (HSWA)



## FLAMMABLE AND EXPLOSIVE SUBSTANCES POLICY

### Overview

We aim to implement adequate measures for the protection of all personnel from fire and explosion risks related to flammable substances and potentially explosive atmospheres in the workplace – colloquially referred to as ‘dangerous substances.’ This Policy only applies to substances that cause harm as a result of their flammable or explosive properties; it doesn’t apply to substances that cause harm to health, this is covered in our Hazardous Substances Policy.

### It is our policy to:

- Where a dangerous substance is or is liable to be present within our workplace, carry out an assessment of the risks to employees and others that arise from the substance.
- Carry out a risk assessment where a potentially explosive atmosphere occurs, i.e. an atmosphere that could become explosive due to local and operational conditions.
- Provide measures to eliminate or reduce risks as far as is reasonably practicable, such as replacing dangerous substances with a less dangerous substance where possible, operating permit to work (PTW) procedures, monitoring of contractors activities, etc.
- Classify places where explosive atmospheres may occur into zones and mark the zones where necessary.
- Ensure flammable substances are correctly packaged/contained, labelled, handled and transported.
- Provide equipment and procedures to deal with accidents and emergencies.
- Provide sufficient information to show that the workplace and work equipment will be safe from risk of fire and explosion during handling, operation and maintenance, supported by adequate employee training and supervision.

[Return to index](#)

### Principal legislation

Dangerous Substances and Explosives Atmospheres Regulations 2002 (DSEAR)  
Regulatory Reform (Fire Safety) Order 2005 (FSO)  
Management of Health and Safety at Work Regulations 1999

## HAZARDOUS SUBSTANCES POLICY

### Overview

We place a strong emphasis on prevention of exposure to hazardous substances in order to prevent workers suffering ill health. Where prevention is not reasonably practicable, then exposure will be adequately controlled by the application of good practice and principles.

### It is our policy to:

Eliminate or reduce hazards to health as far as is reasonably practicable, and ensure that remaining exposure to substances hazardous to health is adequately controlled.

Implement the following actions for all work operations that generate, or could potentially generate, hazardous substances in the workplace:

- Assess and evaluate substances used, or about to be used, to identify potential toxic, harmful, corrosive and irritant effects – taking account of those substances assigned workplace exposure limits (WEL).
- Where applicable, take account of how substances are transported, stored, handled, processed and disposed of, including equipment, training and supervision requirements.
- Ensure employees are informed of the risks to health identified in the assessments, know and put into practice the precautions necessary to eliminate or control any potential risks to health or safety, including the use and maintenance of protective equipment.
- Maintain a current inventory of substances and applicable up-to-date Material Safety Data Sheets (SDS).
- New substances or activities will not be introduced into the workplace without first checking whether it is already in use elsewhere or has been previously assessed, the priority being to eliminate, or change to a less harmful alternative.
- Ensure there are appropriate spillage, emergency and environmental protection procedures in place and that personnel required to carry out these tasks are adequately instructed and trained.
- Provide appropriate health surveillance where assessment shows it is required and that the process is adequately monitored and records maintained.
- Record the significant findings and review the assessment if working practices change.

[Return to index](#)

### Principal legislation

Control of Substances Hazardous to Health Regulations 2002 (as amended) (COSHH)  
Registration, Evaluation, Authorisation and Restriction of Chemicals Regulations (REACH)  
Management of Health and Safety at Work Regulations 1999

## HOUSEKEEPING STANDARDS POLICY

### Overview

We recognise that many of the hazards arising from an untidy workplace can be eliminated by a sound approach to housekeeping that encourages and empowers employees to take pride in their workplace.

#### It is our policy to:

- Nurture and develop a culture to encourage employees to maintain a clean, neat and tidy workplace wherever practicable, so that there is a place for everything and everything is in its place.
- Implement an approach and systems of work that will eliminate or, at least minimise, potential sources of injury, such as:
  - ☐ Slipping on spillages that have not been cleaned up.
  - ☐ Slipping on floors being cleaned.
  - ☐ Slipping due to snow/ice conditions in external areas of premises and building entrances
  - ☐ Tripping over items left across, or obstructing walkways or stairs.
  - ☐ Tripping on damaged or worn floor surfaces.
  - ☐ Tripping by stepping back onto tools, cables, waste, etc. carelessly left in the work zone.
- Recognise that applying basic, sound housekeeping measures that eliminate obstructions or poor storage arrangements can also help to eliminate or minimise hazards relating to:
  - ☐ Falls from height – e.g. having insufficient space to manoeuvre safely, etc.
  - ☐ Fire – e.g. excess flammable materials, blocked fire routes and exits, etc.
  - ☐ Vehicle accidents – e.g. restricted visibility, striking objects in path, etc.
  - ☐ Manual handling – e.g. poor handling environment, restricted posture, etc.
  - ☐ Falling objects – e.g. carelessly stacked/unstable objects, etc.
- Plan to ensure each part of the workplace is 'owned' so that someone takes responsibility for monitoring tidiness.

[Return to index](#)

#### Principal legislation

Health and Safety at Work *etc.*, Act 1974 (HSWA)  
Management of Health and Safety at Work Regulations 1999  
Workplace (Health, Safety and Welfare) Regulations 1992 (as amended)  
Work at Height Regulations 2005

## LONE WORKING POLICY

### Overview

The Company recognises that lone workers may face unusual and difficult problems and we will take all reasonably practicable steps to protect their health, safety and welfare.

#### It is our policy to:

- Not allow lone working where risk assessment identifies unacceptable risks that cannot be reduced by effective control measures.
- Ensure all staff employed in lone worker positions have received comprehensive training, and that they must satisfy the responsible manager that they are competent, medically able and sensibly oriented in all aspects of the work they are expected to carry out.
- Provide appropriate training to cover:
  - ❑ The detailed duties of the job.
  - ❑ Safety aspects of all equipment/machinery to be used.
  - ❑ Any restrictions and/or prohibitions to be observed, including what equipment/machinery they must not operate or activities they must not carry out.
  - ❑ How to recognise and deal with hazardous locations, working at height, or lifting operations that require two or more people, etc.
  - ❑ Emergency procedures, such as fire, accident, illness, physical attack; what action they should take and any specific arrangements for summoning help to be implemented.

It is a requirement that all responsible managers must ensure that relevant safe working procedures are in place and, where necessary, set down in writing and copies given to lone worker employees.

[Return to index](#)

#### Principal legislation

Electricity at Work Regulations 1989 (EWR)  
Confined Spaces Regulations 1997  
Management of Health and Safety at Work Regulations 1999  
Health and Safety at Work *etc.* Act 1974 (HSWA)

## MANUAL HANDLING POLICY

### Overview

The company recognises the debilitating injury and ill health effects that can occur from certain manual handling activities. However, we also acknowledge that in practice, all manual handling within the organisation cannot be totally eliminated. Our objective therefore, is to reduce the risk of injury from manual handling activities by avoiding, where reasonably practicable, the need for employees to carry out those manual handling operations that can lead to significant injury.

### It is our policy to:

Operate the fundamental principle of avoiding manual handling by employing other means such as using mechanical aids. However, if this is not feasible, or doesn't fully remove the hazard posed, then a manual handling risk assessment will be carried out, taking account of:

- The load.
- The task.
- The environment.
- The characteristics of the individual.

Risk assessments will be undertaken by personnel with sufficient knowledge and training to enable them to be completed realistically and competently, and will aim to:

- Identify the hazards and evaluate the problems likely to occur during the work taking account of the task, load, working environment and capacity of the individual.
- Establish measures necessary to deal with problems identified and recommend action to reduce the risk of injury to the lowest level reasonably practicable. This may take the form of changes to working practices, provision of lifting aids, information, training, assistance/team lifts, etc.
- Consider proposals for any new operations, or modifications to existing methods of work, to ensure manual handling implications are taken into account at an early stage. For example where other hazards are combined, such as work at height, confined spaces, etc.
- Employees are expected to report any concerns about manual handling, and are encouraged to make suggestions for improvements to their work activities.

The designated responsible person will ensure assessments are undertaken and reviewed as necessary.

[Return to index](#)

### Principal legislation

Manual Handling Operations Regulations 1992 (as amended)  
Management of Health and Safety at Work Regulations 1999

## MIGRANT WORKERS POLICY

### Overview

Notwithstanding our statutory duty to prevent illegal working, we, as an employer that hires legal migrant workers, recognise they have the same protection and responsibilities under health and safety laws as do the GB workforce.

### It is our policy to:

Clarify and agree the relationship and respective responsibilities for health and safety between the company and our migrant workforce.

Formalise our practical arrangements for the day-to-day management and supervision of workers in writing so as to avoid any misunderstanding or confusion.

Before migrant workers start work:

- Take account of any special qualifications or skills needed for the job.
- Think about the extent of English language skills required.
- Consider what information, instruction and training will need to be provided at the workplace, by whom and how.
- Adapt current accident reporting systems (e.g. RIDDOR and in-house procedures) to include information on nationality.
- Ensure risk assessments take account of migrant worker issues where they are prevalent.

During employment:

- Provide information for migrant workers on their rights and responsibilities.
- Train supervisors and induction teams to improve their cultural awareness and competence in communicating to migrant workers.
- Translate signage, labelling and instructions into priority languages as appropriate
- Ensure migrant workers are represented during management meetings, etc.
- Review the effectiveness of control measures to ensure they remain appropriate and are being implemented correctly.

[Return to index](#)

### Principal legislation

Health and Safety at Work *etc.* Act 1974 (HSWA)

Management of Health and Safety at Work Regulations 1999

## PERSONAL PROTECTIVE EQUIPMENT (PPE) POLICY

### Overview

The Company will provide workers with personal protective equipment (PPE) only as a last resort when other risk protection methods are not reasonably practicable.

#### It is our policy to:

- Provide suitable PPE where risk assessment shows it to be necessary.
- Provide PPE free of charge.
- Select, purchase and provide only PPE showing the CE mark identifying it as satisfying specific safety, testing and certification requirements.
- Where protective equipment is provided for personal issue, maintain a suitable issue record.
- Ensure PPE is replaced if damaged, worn or lost.
- Provide suitable storage facilities for PPE when not in use.
- Ensure PPE is suitable and appropriate for the task, taking account of any other equipment or clothing required to be used in combination.
- Check that PPE correctly fits, and is comfortable for the person using it.
- Carry out 'Fit Testing' for respiratory protective equipment (RPE) where appropriate.
- Ensure there is adequate information, instruction and training for workers using and supervising the use of PPE.
- Rigorously enforce the correct use of PPE by appropriate monitoring and supervision arrangements.

[Return to index](#)

#### Principal legislation

Personal Protective Equipment at Work Regulations 1992 (as amended)  
Work at Height Regulations 2005 (WAH)  
Management of Health and Safety at Work Regulations 1999  
Control of Substances Hazardous to Health Regulations 2002 (as amended) COSHH  
Control of Asbestos Regulations 2012 (CAR)  
Control of Lead at Work Regulations 2002 (CLAW)  
Control of Noise at Work Regulations 2005  
Ionising Radiation Regulations 1999 (IRR)

## RISK MANAGEMENT POLICY

### Overview

We believe that without risk there is no progress; but there is a fine line between innovation and safety.

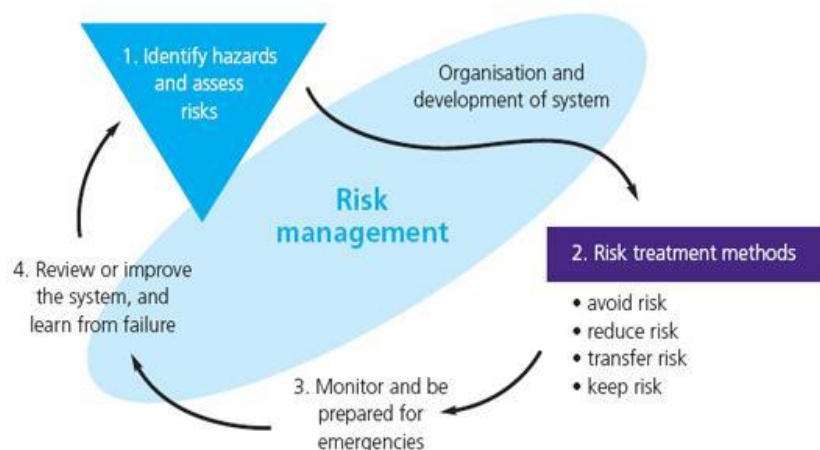
As such, we recognise that effective risk management can help to protect our staff and our business, and key to this is the process of risk assessment.

Our reason for conducting risk assessments is to ensure that we have adequately considered the things that can go wrong in the workplace and their likely consequences and, they are therefore, fundamental to the overall successful management of health and safety risks.

### It is our policy to:

- Ensure that our workers, the public and others affected by our activities are properly protected by managing our risks effectively and responsibly.
- Balance benefits and risks, with a focus on reducing real risks – both those which arise more often and those with serious consequences.
- Empower workforce innovation and learning - not stifle it.
- Understand that failure to manage real risks responsibly is likely to lead to legal sanctions.
- When carrying out risk assessments, ensure we involve the right people – those who understand the risk assessment process as well as those who are involved in the task or area being assessed.
- If risks cannot be eliminated, implement adequate and effective controls – such as safe systems of work – to reduce risks to as low a level as is reasonably practicable.
- Educate individuals to understand that as well as the right to protection, they also have to exercise personal responsibility.

Use as a tool to achieving our objectives the 'Risk Management' model shown below:



[Return to index](#)

### Principal legislation

Health and Safety at Work *etc* Act 1974

Management of Health and Safety at Work Regulations 1999



## SMOKING POLICY

### Overview

The company recognises there is a statutory smoking ban imposed throughout the UK where there are enclosed, and/or substantially enclosed workplaces - including work vehicles/company cars used by more than one person (even at different times), which places a legal responsibility on us to prevent people from smoking.

### It is our policy to:

- Take reasonable steps to ensure employees and others working, or visiting our premises, are aware that the premises and vehicles are legally required to be smoke-free.
- Ensure no one smokes in smoke-free premises or vehicles.
- Display at least one appropriate 'No Smoking' sign in the premises and in company vehicle cabs.
- Assess any increased fire risk from employees or others gathering outside entrances to smoke, or smoking surreptitiously.
- If practical, to accommodate those staff and visitors who wish to smoke, provide an external safe smoking area, distant from combustible materials and with suitably designed bins or buckets for smoker's discarded materials – this will be frequently monitored and cleared of waste materials.
- Consistently enforce the Policy and if necessary, eject visitors from the premises if the Policy is breached.
- Inform employees and responsible managers that any breach of this policy will not only invoke the company disciplinary procedure, but may also result in fixed penalty fines and possible criminal prosecution against not only those smoking, but also those allowing smoking within their area of control.

[Return to index](#)

### Principal legislation

Health and Safety at Work *etc.* Act 1974 (HSWA)  
Smoke-free (Premises and Enforcement) Regulations 2006  
Smoke-free (Exemptions and Vehicles) Regulations 2007  
Smoke-free (Penalties and Discounted Amounts) Regulations 2007  
Smoke-free (Vehicles Operators and Penalty Notices) (Amendment) Regulations 2015  
Smoke-free (Signs) Regulations 2012  
Workplace (Health, Safety and Welfare) Regulations 1992 (as amended)  
Regulatory Reform (Fire Safety) Order 2005 (FSO)

## STRESS POLICY

### Overview

Stress may be defined as an adverse reaction some people may have to excessive pressures or other types of demand placed on them. This may be due to work or factors outside work. We also believe while there may be beneficial effects of reasonable pressure and challenge, there can sometimes be a distressing reaction to demands or pressures. If stress is intense, or continues for prolonged periods of time, it can have adverse effects on both physical and mental health, and employers have a responsibility to consider the impact stress may have on employees.

### It is our policy to:

Consider and assess the impact work-related stress may have on both physical and mental health on our employees, and where appropriate the company will:

- Provide relevant training or information for managers on the issue.
- Provide adequate resources to enable managers to implement this policy.
- Operate the policy in line with the principles of good health and safety and employment law practice.

### Therefore:

- We will inform employees that if they think they may be suffering from significant stress for reasons connected with their working conditions or workload, they are to approach their manager, who should deal with the issue promptly and in the strictest confidence while making reasonable efforts to reduce any work-related stress condition.
- Where appropriate, formal stress counseling may, if reasonably practicable, be arranged by the company.
- On return to work from any period of stress-related illness, the company will take account of medical advice (if appropriate and available), and the needs of the employee and the business when determining which duties are most appropriate.

[Return to index](#)

### Principal legislation

Management of Health and Safety at Work Regulations 1999  
Health and Safety at Work *etc.* Act 1974 (HSWA)

## TRAINING POLICY

### Overview

We recognise that training staff in health and safety will help reduce risks to people and assist the business retain a competitive edge. We see adequate and appropriate training as not only enabling our employees to work safely, but also as a route to developing a competent and efficient workforce.

We also understand that training is not a substitute for proper risk control, but may be appropriate as a temporary measure of control until permanent improvements can be made.

### It is our policy to:

- Provide appropriate employee induction, job specific, and refresher training to achieve and maintain satisfactory standards of competent health and safety performance.
- Support our workforce training programme with adequate information, instruction and supervision arrangements appropriate to the job activity, taking account of a workers ability, experience, age, or special needs.
- Pay particular attention to essential training requirements identified through the risk assessment process for example, work where significant risks are present.
- Ensure management are aware of their responsibilities to plan and organise training to ensure correct and safe standards are attained through the most economical use of time and resources and who they should contact for further.
- Provide clear information to managers on who to contact should they need to obtain advice and guidance on training available both inside, and outside, the company.
- Inform employees they are expected to assist managers/supervisors by bringing to their attention any training needs that may have lapsed, and to fully participate in company training programmes.
- Maintain appropriate records of training.
- Monitor and review our training to ensure our employees are equipped with the skills to enable them to carry out their jobs without detriment to their health or safety.

[Return to index](#)

### Principal legislation

Health and Safety at Work *etc.* Act 1974 (HSWA)  
Management of Health and Safety at Work Regulations 1999  
Corporate Manslaughter and Corporate Homicide Act 2007  
Apprenticeships, Skills, Children and Learning Act 2009

## VEHICLES AT WORK POLICY

### Overview

The company recognises that vehicles at work can be a major cause of fatal and serious injury if risks are not adequately assessed and controlled.

#### It is our policy to:

- Conduct a risk assessment to identify what controls we need to implement to ensure vehicles can operate with minimal risk to drivers, pedestrians and other road users, whether operating in our own premises, on third party premises, or on the public road system.
- From our risk assessment findings, implement a vehicle risk management system in three key areas:
  1. Safe driver – licensing, competence & training
  2. Safe vehicle – selection & maintenance of vehicles and equipment.
  3. Safe site – design for safe segregation of people, reversing, parking, loading/tipping, lighting, signage and operating surface maintenance.
- Ensure there are a robust communication, consultation and reporting mechanisms in place for all incidents and/or driver concerns to be investigated and addressed.
- Instruct all company vehicle drivers that they must not make or receive calls from a hand-held mobile phone, or be otherwise distracted whilst driving such as texting, smoking, eating, drinking, reading, etc.
- Implement procedures to ensure all vehicles used for company business are correctly maintained, legally compliant and that all drivers hold current licences for the type of vehicle and/or operators certificates for vehicles or equipment.
- Follow guidance issued via bodies such as the Road Haulage Association (RHA), Freight Transport Association (FTA), Driver and Vehicle Standards Agency (DVSA) (previously VOSA), Vehicle Certification Agency (VCA) and Health and Safety Executive (HSE) etc. regards current good industry practice or legal requirements.
- Monitor and review the risk management system to ensure controls remain effective in line with business operational developments and commitments.

[Return to index](#)

#### Principal legislation

Health and Safety at Work *etc.* Act 1974 (HSWA)  
Workplace (Health, Safety and Welfare) Regulations 1992 (as amended)  
Management of Health and Safety at Work Regulations 1999  
Provision and Use of Work Equipment Regulations 1998 (PUWER)  
Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)  
Road Safety Act 2006 (as amended)  
Health and Safety (Safety Signs and Signals) Regulations 1996  
Smoke-free (Exemptions and Vehicles) Regulations 2007

## VIOLENCE AT WORK POLICY

### Overview

The company is fully committed to ensuring that all reasonably practicable measures are implemented to protect the health, safety and welfare of all employees, visitors and contractors and will not tolerate violent behaviour of either a physical or verbal nature from its staff, or other persons in the workplace.

### It is our policy to:

- Ensure that potential violence towards employees is adequately assessed and controlled in the same way as any other workplace risk.
- Inform employees that they have a duty not to threaten or otherwise endanger fellow employees or other persons in the workplace, and that they are to report any incident that occurs to management as soon as possible.
- Liaise, where necessary, with the employers of any contract staff working on the premises in order to discuss how any risks of violence that may arise to those staff can best be dealt with.
- Where assessments shows it necessary, provide staff at risk with adequate training in understanding and dealing with aggression in the workplace.
- Ensure that employees know that they should not put at risk their personal safety, or the safety of others, in order to protect company property and if there is a danger of violent assault, the police should be contacted by the most practicable means.
- Investigate all reported incidents of violence in order that appropriate strategies to prevent recurrences may be devised, and to establish if the incident is notifiable to the enforcing authority under RIDDOR.

Where an employee has been the victim of a violent attack, whether physical or verbal, the company will provide appropriate support and help to the individual.

[Return to index](#)

### Principal legislation

Management of Health and Safety at Work Regulations 1999

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

Health and Safety at Work *etc.* Act 1974 (HSWA)

## VISITORS POLICY

### Overview

We recognise that as the employer and occupier of the premises, we have a duty of care towards all visitors with regard to their safety particularly if they are unfamiliar with our premises layout, activities and risk controls, and that their needs may be different from, and/or more onerous than, the needs of our regular employees.

### It is our policy to:

- Monitor, and where necessary, control access of visitors to ensure not only their health, safety and security, but also that of our own employees and others on the premises who may come into contact with visitors.
- Appoint specific individuals to take responsibility for visitors during their time with the company (Part 2 Responsibilities refers).
- Where it becomes an issue, extend our procedures to include uninvited visitors such as trespassers, or children, etc where we could reasonably be expected to do something to prevent exposure to danger.
- Instruct our workers to be vigilant for uninvited visitors entering the premises and, in such cases, to be polite, but firm in ensuring they are escorted from the premises.
- Ensure visitors are aware of any safety rules or procedures specific to their visit.
- Accompany visitors where appropriate or, if permitted unaccompanied access, warn them of any danger areas or other risks to their personal safety or wellbeing.
- Escort or direct visitors to a designated fire assembly point in the event of an evacuation of the premises.
- Record all injuries to visitors in line with the company's accident reporting and investigation procedure.
- Inform visitors of, and enforce, our smoking policy.
- Monitor and review visitor arrangements as part of our risk management system to ensure controls remain effective.

[Return to index](#)

### Principal legislation

Health and Safety at Work *etc.* Act 1974 (HSWA)  
Management of Health and Safety at Work Regulations 1999  
Regulatory Reform (Fire Safety) Order 2005 (FSO)  
Workplace (Health, Safety and Welfare) Regulations 1992  
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)  
Occupiers' Liability Acts 1957 & 1984

## WORKING ABROAD POLICY

### Overview

The Company recognises that working abroad carries certain risk but aims to ensure that such work is properly planned and assessed so employees can work in a safe and protected environment so far as is reasonably practicable.

#### It is our policy to:

- Arrange with our insurance providers to extend our Employers' Liability Insurance cover appropriate to our world-wide operations
- Plan and document all decisions to send workers abroad, showing the basis for those decisions
- Find out in advance what specific health and safety regulations apply in the country of destination.
- Assess and record risks involved in travelling to, working in, and returning from, the country of destination including personal health/medical and vaccination requirements
- Where our employees will work in premises abroad under the control of other employers/occupiers, liaise, and agree with, those third parties to consider appropriate protective measures and controls that would be reasonable under the circumstances
- Check the latest Foreign Office advice and guidance relating to political unrest or other dangers relevant to the country of destination or areas on route as part of the assessment process
- Consider ability, experience and training to ensure workers are prepared and equipped to carry out what is expected of them and that possible language difficulties have been accounted for
- Provide employees with appropriate information and training regarding what rules apply to them during the duration of their stay and check that they fully understand and are capable of implementing what measures they should take to avoid ill health, injury and other identified dangers
- Ensure there are workable arrangements for maintaining contact at all times and where appropriate, monitoring and feedback of safety or security concerns
- Decide how, if necessary, emergency evacuation will be carried out.

[Return to index](#)

#### Principal Legislation

Health and Safety at Work *etc* Act 1974

Management of Health and Safety at Work Regulations 1999

Corporate Manslaughter and Corporate Homicide Act 2007

## WORK AT HEIGHT POLICY

### Overview

The company's overall Policy objective is to plan, assess and implement systems and procedures that ensures all work at height can be carried out competently and safely, including ensuring all work equipment is suitable, serviceable, maintained and subject to a statutory inspection regime where appropriate.

We also recognise that where we control the work of any third party (such as contractors) working on our behalf, we both have duties under the Work at Height Regulations.

### It is our policy to:

Aim to prevent deaths and injuries caused by falls from height at work by following three simple rules:

1. We will **avoid** work at height where we can - If there is no need to, we won't.
2. If work at height cannot be avoided we will **prevent** falls by selecting and using the right access equipment.
3. We will **minimise** the impact of any fall. Where we cannot eliminate the risk of a fall, we will use work equipment or other means to minimise the distance and consequences of a fall, should one occur

Each of the above rules will be considered in the order shown.

We will only consider choosing access equipment once it has been decided that work at height is unavoidable.

Also, all work at height must:

- Be kept to a minimum
- Be properly planned and risk assessed, taking into account adverse weather conditions and what rescue measures need to be taken in an emergency.
- Where necessary, be appropriately supervised, particularly taking account of new, young or inexperienced workers
- Be carried out by someone who is trained and competent and able to complete the task safely. The competent person must be able to erect, use, dismantle or operate as appropriate the selected access equipment.

[Return to index](#)

### Principal legislation

Work at Height Regulations 2005

Provision and Use of Work Equipment Regulations 1998 (PUWER)

Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)

Management of Health and Safety at Work Regulations 1999



## WORK EQUIPMENT POLICY

### Overview

We acknowledge that although essential to business, some types of work equipment have the potential to cause serious injury and fatalities if poorly selected, badly maintained, wrongly used, or used by untrained or unsupervised people.

### It is our policy to:

Select and provide suitable equipment for the job it has to do, supported by an appropriate risk assessment and safe controls process, that ensures:

- Working conditions and all other inter-related hazards are taken into account during the initial risk assessment and subsequent selection and provision process.
- Equipment is provided with clearly visible, easily recognisable controls, markings, warnings and (if necessary), quickly and easily operable emergency stop controls.
- Dangerous parts of machinery are effectively guarded, or persons are prevented from reaching the danger areas.
- Planning and organising allows for safe operation, adjustment, breakdown, cleaning, maintenance, etc. of machinery so that it is correctly isolated to prevent it starting without warning.
- Equipment is well maintained, in good repair and working order, and all statutory examinations and inspections are carried out with up-to-date records kept.
- Where work equipment is exposed to conditions causing deterioration, it is inspected at regular intervals and each time there is a possibility that the safety of the equipment has been jeopardised.
- Any hired-in work equipment is accompanied by a current statutory inspection and/or maintenance record if appropriate.
- Only trained, competent and authorised persons can use, clean and maintain plant, tools and equipment, with restrictions or prohibitions strictly enforced if necessary for reasons of personal health or safety.
- Appropriate on-going information, instruction and training is given to operators, supervisors, and managers, so they know not just how equipment works, but also the safe operation of all safety devices, guards, etc.
- An effective system is in place for employees to carry out and record pre-use equipment checks together with the defect reporting procedure.

[Return to index](#)

### Principal legislation

Provision and Use of Work Equipment Regulations 1998 (PUWER)  
Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)  
Management of Health and Safety at Work Regulations 1999  
Employers' Liability (Defective Equipment) Act 1969

# **PART FOUR**

# **LLOYDS EMPLOYMENT LAW REPORTS**

**KEEP YOUR CURRENT REVIEW, VISIT AND SURVEY  
REPORTS HERE**

**NOTE: OLDER REPORTS SHOULD BE ARCHIVED**

# CONTENTS

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# **PART FIVE**

## **MANUAL ONE & CD ROM REVIEW AMENDMENT HISTORY**

*RECORD ANY CHANGES OR AMENDMENTS TO YOUR POLICY MANUAL HERE*

## MANUAL ONE REVIEW AND AMENDMENT RECORD

**The historical development of our documentation is recorded to demonstrate that we have reviewed and updated our Policy. We will communicate any changes to our employees and others as necessary.**

[illegible]

## CD ROM REVIEW AND AMENDMENT RECORD

**The historical development of our documentation is recorded to demonstrate that we have reviewed and updated our Policy. We will communicate any changes to our employees and others as necessary.**

[illegible]