



Health and Safety Policy

Company Health, Safety & Environmental Policy	Authorised by:	Penny Streeter	
Review Date	January 2015	Revision No & Date	Rev05 Issue01 January 2014

Health and Safety Policy

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1.0 Introduction

In compliance with the requirement of Section 2 of the Health and Safety at Work etc. Act 1974, A24 Group are effectively discharging its statutory duties by preparing a written health and safety policy.

A copy of the policy, which outlines the company's health and safety arrangements and organisational structure, is provided at the company premises, along with a copy of the company's staff handbooks that must be read by all employees and any other interested person who may be affected by their work activities.

In order for A24 Group to discharge its statutory duties, employees are required by law, to co-operate with the management in all matters concerning the health, safety and welfare of themselves and any other person who may be affected by their acts or omissions whilst at work.

The Health and Safety Management System for A24 Group is kept in the office and is available for inspection by any interested party upon any reasonable request.

A24 Group agree that in order to ensure that the health and safety policy is sustained in an effective condition, it is essential that the information is up-to-date and accurate. It is the responsibility of Penny Streeter, the Managing Director to liaise with Seguro Management Ltd, our Health and Safety Consultants and to ensure that suitable revisions are made that reflect changes which have taken place within the company. The Consultants employed by Seguro Management Ltd will advise on new and relevant legislation throughout the year and review all documentation on their annual audit. In addition, the policy will be reviewed if accident reports or the findings of any management inspections raise concerns.

A24 Group encourages all employees to inform their immediate superior of any areas of the health and safety policy that they feel are inadequate to ensure that the policy is maintained as a true working document.

Health and Safety Policy Statement

The following is a statement of the company's general health and safety policy in accordance with section 2 of the Health and Safety at Work etc Act 1974.

It is the policy of A24 Group to ensure so far as is reasonably practicable the health, safety and welfare of all of the employees working for the company or other persons who may be affected by our undertakings.

A24 Group acknowledges that the key to successful health & safety management requires an effective policy, organisation and arrangements, which reflect the commitment of senior management. To sustain that commitment we will continually measure, monitor and revise where necessary an annual plan to ensure that health and safety standards are adequate.

The Operations Director will implement the company's health and safety policy and recommend any changes to meet new circumstances. The instructions will then be carried out through the normal chain of management. The company recognises that successful health and safety management contributes to successful business performance and will allocate adequate finances and resources accordingly.

The management of A24 Group looks upon the promotion of health and safety measures as a mutual objective for themselves and their employees at all levels. It is therefore, the policy of the management to do all that is reasonably practicable to prevent personal injury and damage to property. Also the company aims to protect everyone, including all visitors and members of the public, insofar as they come into contact with the company or its activities, from any foreseeable hazard of danger.

All employees have duties under the Health and Safety at Work etc Act 1974 and they are informed of their personal responsibilities to take due care for the health and safety of themselves and to ensure that they do not endanger other persons by their acts or omissions. They are also informed that they must co-operate with the company in order that it can comply with the legal requirements placed upon it and in the implementation of this policy.

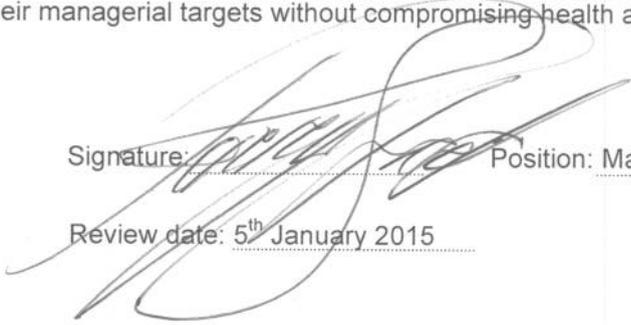
The company will ensure continued consultation with the workforce to enable all viewpoints and recommendations to be discussed at regular intervals.

The company will ensure a systematic approach to identifying hazards, assessing the risk, determining suitable and sufficient control measures and informing employees of the correct procedure.

The company will provide, so far as is reasonably practicable, safe places and systems of work, safe plant and machinery, safe handling of materials and substances, the provision of adequate safety equipment and ensure that appropriate information, instruction, training and supervision is given.

The company regards all health and safety legislation as the minimum standard and expects management to achieve their managerial targets without compromising health and safety.

Name: Ms. Penny Streeter

Signature: 

Position: Managing Director

Date: 6th January 2014

Review date: 5th January 2015

Environmental Statement

A24 Group recognises the need for sustainable development and continually aims to improve the environmental effect of its activities. To achieve this we will: -

Establish sound environmental management by: -

Meeting or improving upon relevant legislative, regulatory and environmental codes of practice.

Developing objectives that target environmental improvements and monitor performance by regular review.

Considering any environmental issues in the decision-making process.

Developing a relationship with suppliers and contractors so that we all recognise our environmental responsibilities.

Educating staff so that they carry out their activities in an environmentally responsible manner.

Provide for the effective use of resources by: -

Promoting waste minimisation by recycling or finding other uses of by-products whenever economically viable.

Promoting the efficient use of resources, energy and fuel throughout the company's operations.

Co-operate with: -

The communities in which we operate.

The government, regulatory bodies and other interested parties with the shared vision of being a good and trusted neighbour.

Name: Ms. Penny Streeter

Signature: 

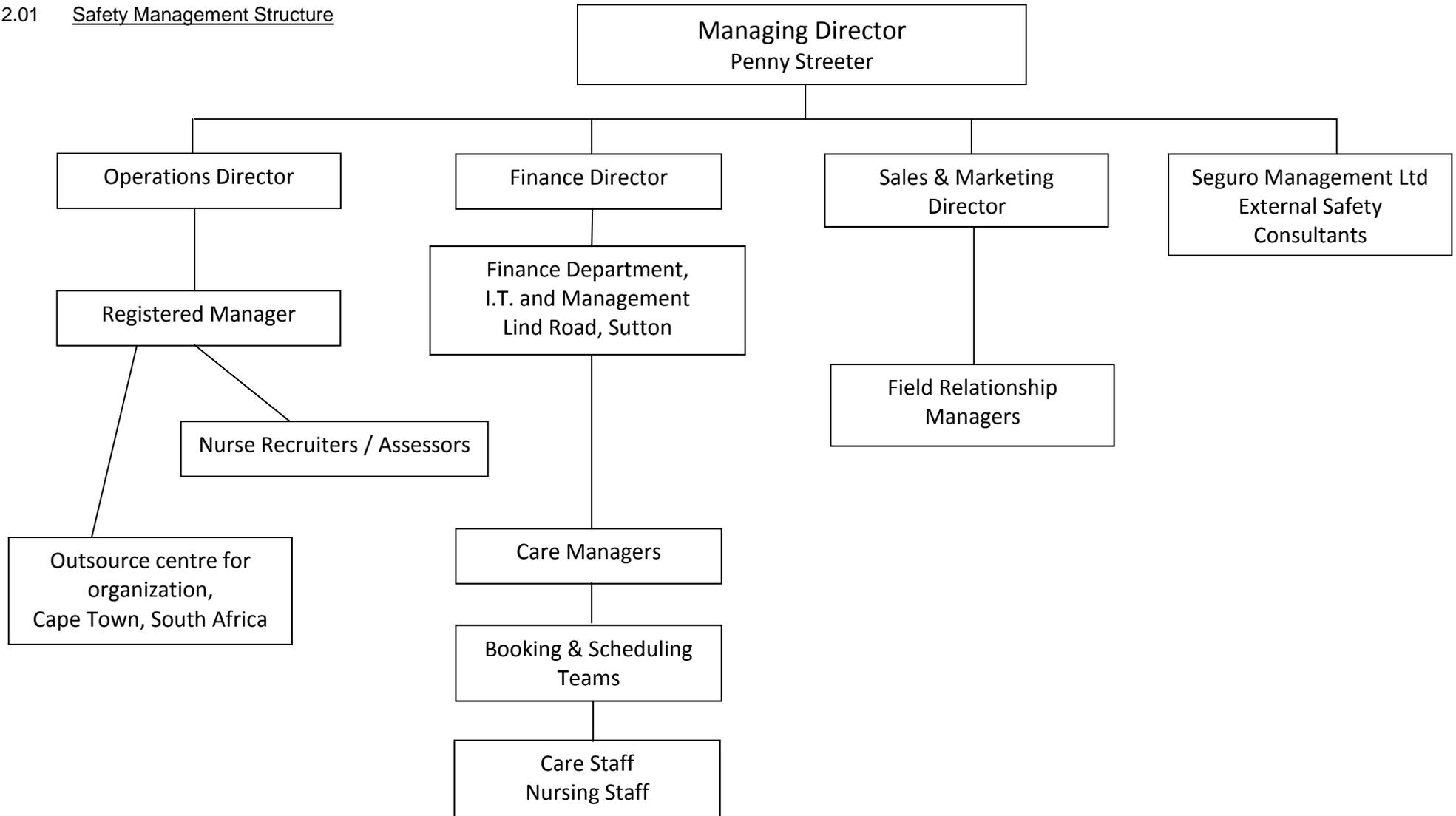
Position: Managing Director

Date: 6th January 2014

Review date: 5th January 2015

2.0 Organisation

2.01 Safety Management Structure



2.02 Individual responsibilities

Section 2 of the Health and Safety at Work etc Act 1974 places a duty on employers to prepare a written health and safety policy which will give details of the responsibilities for ensuring the health, safety and welfare of all employees. The following list of responsibilities has been collated to ensure compliance with legislation.

The Managing Director will ensure that: -

- She has a good understanding of the main requirements of the Health and Safety at Work etc. Act 1974.
- All levels of management within the company fully understand the arrangements for the implementation of the health and safety policy.
- Sufficient funds are made available for the requirements of health, safety and welfare provisions.
- All Managers and staff fully understand safe systems of work, rules and procedures and that suitable records are kept.
- The organisational structure is appropriate in order to manage health and safety.
- The same management standards are applied to health and safety as to other management functions.
- Liaise directly with the Health and Safety Advisors to ensure total compliance with current legislation and good practice.
- Adequate health and safety training is provided for all employees. This shall commence on induction and include any specific training regarding company rules, safe systems of work and training required to perform their duties and work-related tasks.
- Understand and apply the Safety Policy of the Company generally and in particular to ensure the co-ordination of and co-operation between the Company and others concerned.
- Set a personal example by the observing safety procedures, encourage employees and other persons to do the same.

The Directors will ensure that: -

- They liaise with the appointed health and safety advisors on all matters regarding health and safety. It is then the Directors duty to report these matters and findings directly to the Managing Director.
- They have a good understanding of the main requirements of the Health and Safety at Work etc. Act 1974
- Regular health and safety audits and inspections are carried out in accordance with company's health and safety monitoring procedures.
- Employees and any other relevant persons are informed of the location of first aid personnel, facilities and the importance of recording all accidents / incidents in the accident book.
- All accidents / near miss incidents are investigated and recorded on the incident record form and control measures implemented to prevent any recurrence.
- Arrangements for fire safety are implemented and that all relevant checks are carried out.
- Joint consultations between management and employees take place as described in the policy.
- Regular health and safety meetings are held to ensure effective health and safety consultation.
- All health and safety issues raised by employees are recorded and investigated.

- Any faulty work equipment identified is immediately taken out of service until repaired or replaced.
- Records are compiled for statutory inspections, testing or maintenance undertaken on all work equipment and services within the premises.
- A system is implemented to ensure contractors have the necessary competence and resources in order to carry out work safely on behalf of the company.
- Contractors are adhering to safety rules and procedures and any other statutory legislation relevant to their work.
- All welfare facilities, including temperature, lighting and ventilation levels, are adequate.
- Safe access and egress are provided and maintained in all areas within the company.
- Relevant statutory signs and notices are provided and displayed in prominent positions.
- All electrical equipment is adequately maintained and that only suitably trained and competent persons carry out electrical work. No employee shall undertake any kind of electrical work where specialist knowledge is required in order to avoid danger.
- Determine during preliminary procedures and in advance of any work proceeding, so far as is reasonably practicable, safe methods of working, access, lighting, known hazards, fire precautions, allocation of responsibilities including sub-contractors and others.
- Ensure that facilities for welfare sanitation are considered and provided for. Adequate equipment will be available for operations to proceed in a safe manner; this includes all short-term operations where facilities may not be easily accessible
- Ensure that working methods and safety procedures are carried out in a competent and planned manner, and operations are supervised by competent personnel. Arrange as may be required for the revision of working methods and safety procedures.
- Arrange (as required) for instruction, training, information and the provision of supervision so as to ensure that employees at all levels are competent.
- Ensure that all persons, including the general public, within the proximity of premises and operations under the control of the Company are not exposed to risks to their health and safety.
- Ensure that all persons authorised to be working on premises under the control of the Company, adhere to safe working procedures and comply with all regulations applicable to their work.
- Set a personal example by the observing safety procedures, encourage employees and other persons to do the same.

The Line Managers will: -

- Ensure compliance with the Company's Health & Safety Policy and all relevant legal requirements.
- Ensure correct channels of communication when working on clients premises or in private dwellings.
- Ensure risk assessments have been carried out and the control measures implemented.
- Ensure all persons in their charge are aware of the hazards and the means of reducing them.
- Ensure safe systems of work are followed and worked too.
- Ensure cooperation between company employees and those persons likely to be affected by the company's activities.
- Ensure the correct supervision of all employees and especially of any young persons within their employ.
- Ensure high standards of housekeeping at all times.
- Ensure the promotion of, safe and healthy working practices.
- Ensure all defective equipment is removed out of service and documented.
- Report and investigate all accidents and report those findings to their allocated Line Manager.
- Ensure good standards of discipline at all times.
- Report all unsafe acts and take the necessary action to prevent a reoccurrence.
- Set a personal example by the observing safety procedures, encourage employees and other persons to do the same.

Duties of the Health & Safety Management Consultant: -

- To assist in developing a proactive attitude to Health, Safety and Environmental matters by advising on and encouraging, a positive Health & Safety Management culture throughout the organisation.
- To inform the Managing Director, Directors and Line Managers of relevant new legislation, recommend working methods for compliance and assist with dissemination of this information throughout the organisation.
- To carry out, on request, inspections, the monitoring of all active locations and report their findings, in the form of a written report to the Supervisor / Manager responsible for health, safety and welfare.
- To highlight any employee/subcontractor training requirements and, where appropriate, provide such training with regard to Health & Safety, in the form of modular training or tuition relating to legal compliance or the avoidance of specific risk.
- To feedback information, suggestions, problems, concerns etc., from the workforce to the manager and assist him to measure performance and to set objectives to effect improvement.

2.03 Employers responsibilities

As employers we have a duty to all employees, casual workers, part-time workers, trainees, visitors and sub-contractors who may be in our workplace or using equipment provided by the company. Consideration must also be given to our neighbours and the general public.

Management will ensure they: -

- Assess all risks to worker's health and safety and bring the significant findings to the attention of employees.
- Provide safe plant and equipment that is suitably maintained.
- Provide a safe place of work with adequate facilities and safe access and egress.
- Provide adequate training and information to all employees regardless of their position within the company.
- Have provisions in place to guarantee that articles and substances are handled and stored in a proper manner.
- Provide health surveillance to employees where it is deemed necessary.
- Appoint competent persons to help comply with health and safety law.

2.04 Employees responsibilities

The Health and Safety at Work etc Act 1974 details two main sections which employees are required to comply with. These are: -

Every employee working for the company has a duty of care under the Health and Safety at Work etc Act 1974 Section 7 to take reasonable care of himself/herself and any other person who may be affected by his/her actions and omissions.

In addition to the above, Section 8 states that under no circumstances shall employees purposely or recklessly interfere or misuse anything provided in the interest of safety or welfare, life saving equipment, signs or fire fighting equipment.

Employees also have a duty to assist and co-operate with their employers and any other person to ensure all aspects of health and safety legislation are adhered to.

Employees are obliged to: -

Always follow safety rules, avoid improvisation and comply with the health and safety policy.

- Only perform work that they are qualified to undertake.
- Always store materials and equipment in a safe manner.
- Never block emergency escape routes.
- Always practise safe working procedures, refrain from horseplay and report all hazards and defective equipment.
- Always wear suitable clothing and Personal Protective Equipment for the task being undertaken.
- Inform the Manager and/or First Aider of all accidents that occur.

The Management of Health and Safety at Work Regulations require all employees to: -

- Utilise all items that are provided for safety.
- Comply with all safety instructions.
- Report to management anything that they may consider to be of any danger.
- Advise management of any areas where protection arrangements require reviewing.

2.05 Responsibilities and duties of Sub-contractors/Self employed personnel

- Will be made aware of the company's health and safety policy and safety rules.
- Will themselves be fully aware of the responsibilities and requirements placed upon them by the Health and Safety at Work etc Act 1974 and other relevant legislation.
- Will comply with all instructions given by the management of the company.
- Will co-operate with the company in ensuring a high standard of health and safety on all contracts with which they are involved. If the standards stipulated by the company are higher than basic requirements, then they shall comply with the higher standard.
- Will carry out risk assessments in relation to their activities, ensure that appropriate health and safety arrangements are implemented and by adequate liaison inform and co-operate as necessary with the company.
- Will ensure that all activities are detailed in comprehensive method statements, and that everything possible will be done to ensure full compliance with the statements produced.

2.06 Information for employees

Information regarding health and safety law is provided by a number of methods as follows: -

- Employees are provided with a copy of the company's employee safety handbook.
- The approved poster "Health and Safety Law – What You Should Know" will be displayed in the office container. This poster will always be kept in a legible condition with the address of the local enforcing authority, the Employment Medical Advisory Service (EMAS) and the names of responsible persons entered in the appropriate spaces.
- Management have access to a 24 hour helpline that will connect them to a Seguro Management Ltd health and safety consultant who will advise on all aspects of health and safety.
- Management and employees have access to the company health and safety general policy that contains all relevant information with regard to recording and monitoring.

2.07 Joint consultation

The Health and Safety (Consultation with Employees) Regulations require all employers to consult with their employees who are not represented by safety representatives under the (Safety Representatives and Safety Committees Regulations).

The company recognises the importance and benefits to be gained by consultation with our employees. All information with regard to health and safety is communicated by means of consultation between management and employees.

It is the responsibility of the Managing Director to ensure that consultation takes place in good time on matters relating to employee's health and safety at work.

If at any time the method of consultation becomes ineffective due to the size or nature of the business then the company would recognise the rights of employees or groups of employees to elect one or more persons to act as their representative for the purposes of such consultation.

Seguro Management Ltd along with other professional bodies will inform senior management of any relevant changes to health and safety. This information will be disseminated to the Managing Director who in turn will inform the appropriate members of staff.

If any visitors/clients raise any concerns with regard to health and safety, the Managing Director will investigate the issue and either deal with it him/herself or with guidance from Seguro Management Ltd's advice line.

If required, senior management will request that Seguro Management Ltd the company's external safety consultants will liaise with the local enforcing authority on the company's behalf.

2.08 The working time regulations

Working time is any period during which a worker is working, at the employer's disposal and carrying out his activity or duties, any period when the worker is receiving relevant training and any additional periods that the employer and workers agree by relevant agreement.

With the exception of exempt workers, employees will not be required to work more than an average of 48 hours in a seven-day period. The average is normally calculated over a 17-week rolling reference period but this can be successive 17-week periods if this is specified in a relevant agreement.

The average is calculated using the formula $\frac{(A) + (B)}{(C)}$ where: -

- (A) The total number of hours worked during the reference period,
- (B) The total number of hours worked immediately after the reference period to compensate for any 'excluded days' and
- (C) The number of weeks in the reference period.

'Excluded days' are non-working days that occur because of holidays, sickness, etc. Where there are excluded days during the reference period, hours worked on an equivalent number of days immediately after the reference period have to be added in to the calculation as (B).

For the first 17 weeks of employment, workers should not have an average in excess of 48 hours a week, their average is calculated by dividing the total number of hours worked by the total number of weeks worked.

There is a general requirement on our company to take reasonable steps to ensure that workers do not work in excess of the 48-hour average, which includes asking whether or not the worker has more than one job.

There is no requirement to keep specific records of hours worked, but if required we will show an officer of the HSE or local authority that workers have not exceeded the 48-hour average.

Employees can opt-out of the maximum 48-hour week by means of an individual agreement. This agreement must be in writing and may either be for a fixed period or for an indefinite period. Unless a period of notice to terminate the agreement (which cannot exceed three months) is specified, it can be terminated with seven days notice by the employee.

Employees cannot be forced to opt-out of the 48-hour week and it is unlawful to take action against them for refusing. If an employee does opt-out of the 48-hour week, we have to keep a copy of the individual opt-out agreement but do not have to keep any records in relation to the hours worked.

Rests

Employees are entitled to a minimum uninterrupted rest break away from the workplace of 20 minutes in any work period that exceeds six hours, unless different periods are agreed in a collective or workforce agreement.

For young workers (16 to 18 year olds) the rest break is 30 minutes in any work period that exceeds four-and-a-half hours and no agreement can alter this.

The break must be continuous unless a situation arises which is unforeseen and unavoidable, in which case compensatory rest breaks must be given within three weeks.

Employees are entitled to a daily rest of at least 11 consecutive hours (12 hours for young workers) in each 24-hour period.

Employees are entitled to a weekly rest of at least 24 consecutive hours in a seven-day reference period. The seven-day period starts at midnight between Sunday and Monday unless a relevant agreement states otherwise. The weekly rest should start immediately after an 11-hour daily rest unless there are objective, technical or organisational (OTO) reasons why the weekly rest cannot follow the daily rest. Derogations on weekly rests can be made by local, collective or workforce agreements.

For adult workers, the 24-hour weekly rest can be averaged over a 14-day reference period by giving two rest periods of at least 24 consecutive hours or one rest period of at least 48 consecutive hours in each 14-day period. The option to use a 14-day reference period is the company's and in theory this would give a maximum continuous work period of 24 days in two 14-day periods (2 off, 12 on, 12 on, 2 off).

Young workers should have two 24-hour rest periods in each seven-day reference period, preferably consecutive. This can be reduced to 36 continuous hours (12 hours daily rest followed by 24 hours weekly rest) if this can be justified for OTO reasons.

As with the 48-hour average working week, it is unlawful to take any action against workers for taking or attempting to take their entitlement to rest breaks or daily/weekly rests.

3.0 Arrangements

3.01 Access and egress

The company is committed to providing a safe place of work and a safe means of access and egress within all parts of premises including client premises.

To achieve this the company will ensure, so far as is reasonably possible, that: -

- Articles do not impede safe access and egress in the premises and that objects that may restrict safe movement within the premises are removed or rectified immediately.
- Any access restrictions are adhered to, so that suitable and safe arrangements for work in high risk are guaranteed.
- Safe systems of work are implemented in all areas where there is significant risk.
- Employees are encouraged to report any situation where safe access and egress is restricted or obstructed so that arrangements for the appropriate remedial action can be taken.
- All client premises will be closely monitored to ensure that they do not hinder safe access/egress of personnel when working at the premises.

To ensure that safe access and egress are maintained in such areas the Department Managers will ensure that regular inspections are undertaken.

3.02 Accident reporting procedures

The company defines an accident as: -

An unplanned or unforeseen event, which causes injury to persons, damage to property or a combination of both. i.e. a fall resulting in a fracture; incorrect operation of equipment leading to breakdown or damage.

The company defines a near miss as: -

An unplanned or unforeseen event that does not cause injury or damage, but could have done so. i.e. loose or defective flooring covering; short-circuits on electrical equipment.

The company defines a dangerous occurrence as: -

An unplanned or unforeseen incident that may not have caused a notifiable injury under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) but it had the potential to do so and must be reported to the enforcing authority. Lists of dangerous occurrences that must be reported are shown in the RIDDOR Guide located in Section B of the health and safety management file.

The first priority when an accident occurs is to obtain first aid treatment for all injuries, if the incident is serious enough to warrant medical intervention the manager/supervisor will dial 999 call and request an ambulance/paramedic.

When the casualty has received suitable medical/first aid treatment details of the accident should be recorded in the accident book for future reference.

Accidents that occur on duty must be reported to:

- Agency workers – All injuries on duty as well as accidents and near misses to be reported to complaints@a24group.com.
- Internally employed staff - Register of all injuries, accidents and near misses to be kept at our Sutton Head Office. All injuries on duty as well as accidents and near misses to be reported to Sally Page.
- All of the above to be immediately reported to Seguro Management Ltd (our Safety Advisors) by Sally Page or Senior Staff Manager on 08448 733 675

In order to determine what corrective action is necessary to prevent a repetition it is essential to isolate all contributing factors. This can only be done by an investigation. The outcome of all investigations will be communicated to all members of staff who need to take action as a result of an accident.

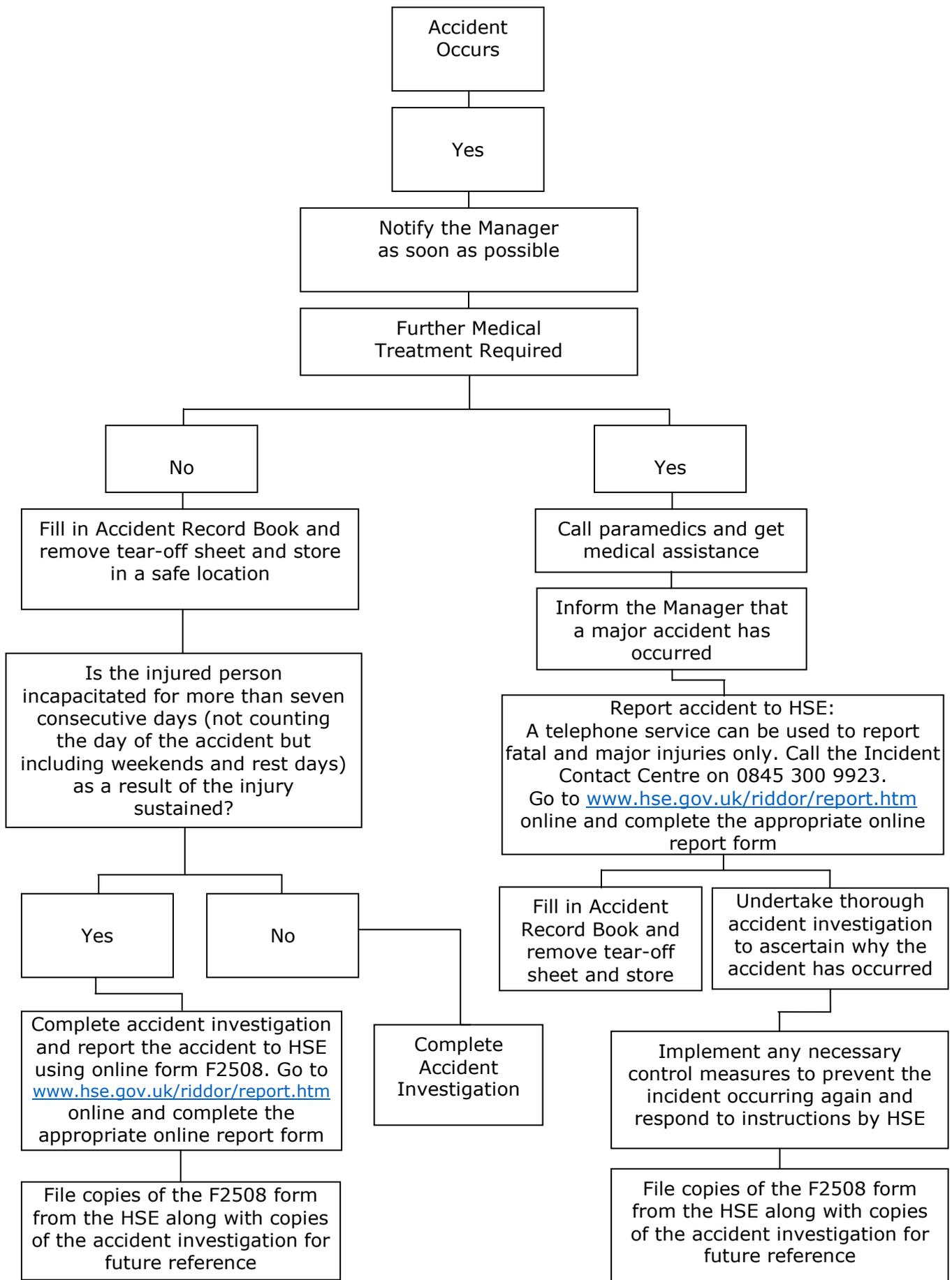
Accident investigations are carried out to establish the facts relating to the accident/incident not individual's opinions. Under no circumstances will such investigations be used as a mechanism to apportion blame. Investigations are primarily a management tool to identify suitable measures to prevent a recurrence.

In order to comply with the Reporting of Injuries, Diseases and Dangerous Occurrence Regulations (RIDDOR) it is imperative that all major accidents are reported to the enforcing authority. It is the responsibility of the Managing Director to investigate the accident/dangerous occurrence and contact the national incident centre immediately when necessary. If there is any doubt about reporting accidents or dangerous occurrences the Managing Director, Sally Page or Senior Staff Manager will contact Seguro Management Ltd's advice line for further guidance.

All accident information that is entered into the accident book will be kept for a minimum of three years.

Near misses are defined as incidents that almost become accidents, but only missing by a very small margin of error. All near misses should be reported and recorded because a series of near misses could very easily become a hit or an accident.

Relevant risk assessments and safe systems of work may require revision following a near miss incident.



3.03 Alcohol and Drugs

The company realise that the consumption of alcohol or drugs by employees can be a serious problem not only for the abuser but also for their co-workers. The possession of certain drugs is illegal, exposing the abuser to criminal charges.

The company has a general duty under The Health and Safety at Work etc Act 1974 to ensure the health, safety and welfare of all employees, the company will also be breaking the law if they knowingly allowed drug related activities on their premises and they failed to act.

Responsibility

The Managing Director is responsible for carrying out the company's policy; however it is the responsibility of all staff to ensure that its aims are carried out in areas under their control. This policy applies to all employees and they should have access to the full policy and be aware of any changes.

Signs of misuse

Senior staff will be aware that the misuse of drugs or alcohol by employees might come to light in various ways. The following characteristics, especially when arising in combination, may indicate the presence of an alcohol or drug related problem.

- Unexplained and increased absenteeism
- Instances of unauthorised absence or leaving work early
- Poor time keeping i.e. lateness, especially on returning after lunch
- Unusually high level of sickness/absence for colds/flu/stomach upset
- Impaired job performance
- Dishonesty/theft
- Unusual irritability, aggression and mood changes
- Tendency to be confused and fluctuations in concentration & energy
- Accidents

Company procedure on drugs and alcohol

- Employees are expressly forbidden to consume alcohol when at work or to bring it onto company premises without prior management permission. Any breach of this rule will result in disciplinary action being taken that is likely to result in summary dismissal.
- Employees who misuse drugs which have not been prescribed on medical grounds will, in the absence of mitigating circumstances, be deemed to be committing an act of gross misconduct and will thus render themselves subject to the company's disciplinary procedures. This also applies to employees believed to be buying or selling drugs or in possession of unlawful (i.e. un-prescribed) drugs.
- If an employee is known to be or strongly suspected of being intoxicated by alcohol or drugs during working hours, the Managing Director or nominated deputy should make arrangements for the employee to be escorted from the company premises immediately, pending further investigation.
- A Manager who feels an employee's unsatisfactory performance may be drug or alcohol related will at the first instance assess the ability of that person to work safely and act accordingly. The nature of work they do will be a significant factor in this assessment and may result in the person being removed from the workplace in the interests of safety.

Safeguards when dealing with drugs and alcohol problems

It should be made clear that the company is aware that a person suffering from these problems will be dealt with fairly.

The company realise that: -

- Absence for treatment and rehabilitation will be regarded as normal sickness
- Relapses may occur
- The policy will be monitored with consultation with employees and safety representatives

Drug misuse awareness

All Managers and staff will be made aware of the effects of alcohol and drug misuse. All employees should also be made aware of the company procedures and information through notices, posters and leaflets will be made available. All employees are encouraged not to cover up for employees with a drink or drug problem but to recognise that collusion represents a false sense of loyalty and will, in the longer term, damage those employees. Individual advice should be sought, confidentially through the management structure of the company, the policy details this procedure. External advice and information can be obtained through local organisations dealing with drugs and alcohol abuse.

3.04 Control of substances hazardous to health (COSHH) assessments

It is the intention of the company to secure the health and safety of all persons so far as is reasonably practicable from the hazards in the use, handling, storage, disposal and transportation of all substances, by assessing the risks to prevent or control any ill health effects or accidents arising from or out of any such activities.

The company acknowledges that no substance can be considered completely safe. All reasonable steps will therefore be taken to ensure that all exposure of employees to substances hazardous to health is prevented or at least controlled to within the statutory limits.

The company recognises that the co-operation and assistance of all staff is of the utmost importance. In assessing the risks, the recommendations of the employees undertaking the tasks will form an important part of the assessment and where practicable will be implemented during any alteration to the work environment, practices or equipment.

To enable the company to comply with the control of substances hazardous to health regulations (COSHH) the company will endeavour to hold all the relevant data on the toxicity and potential hazard of all substances used within the premises. This includes all samples obtained from salespersons.

Each level of management is directly responsible for ensuring that persons within their control are not injured or adversely affected by substances. This will be accomplished by identifying hazardous substances and assessing the associated risks from them together with the processes they are used in or derived from, then implementing such safety measures to reduce, control or eliminate the risk at source.

The Managing Director is responsible for ensuring that their COSHH lists are kept up-to-date and that any changes are notified to the appointed person as soon as possible by submitting an amended listing.

A copy of each relevant COSHH risk assessment will be held within the health and safety file and a copy will be provided to all those persons considered to be at risk.

Where unsafe practices are viewed, individuals are to be reminded by the Managing Director of their responsibilities under the regulations. Where, in the opinion of company, management contractors are using unsafe practices, they are to inform them to cease work until a safer alternative is agreed upon.

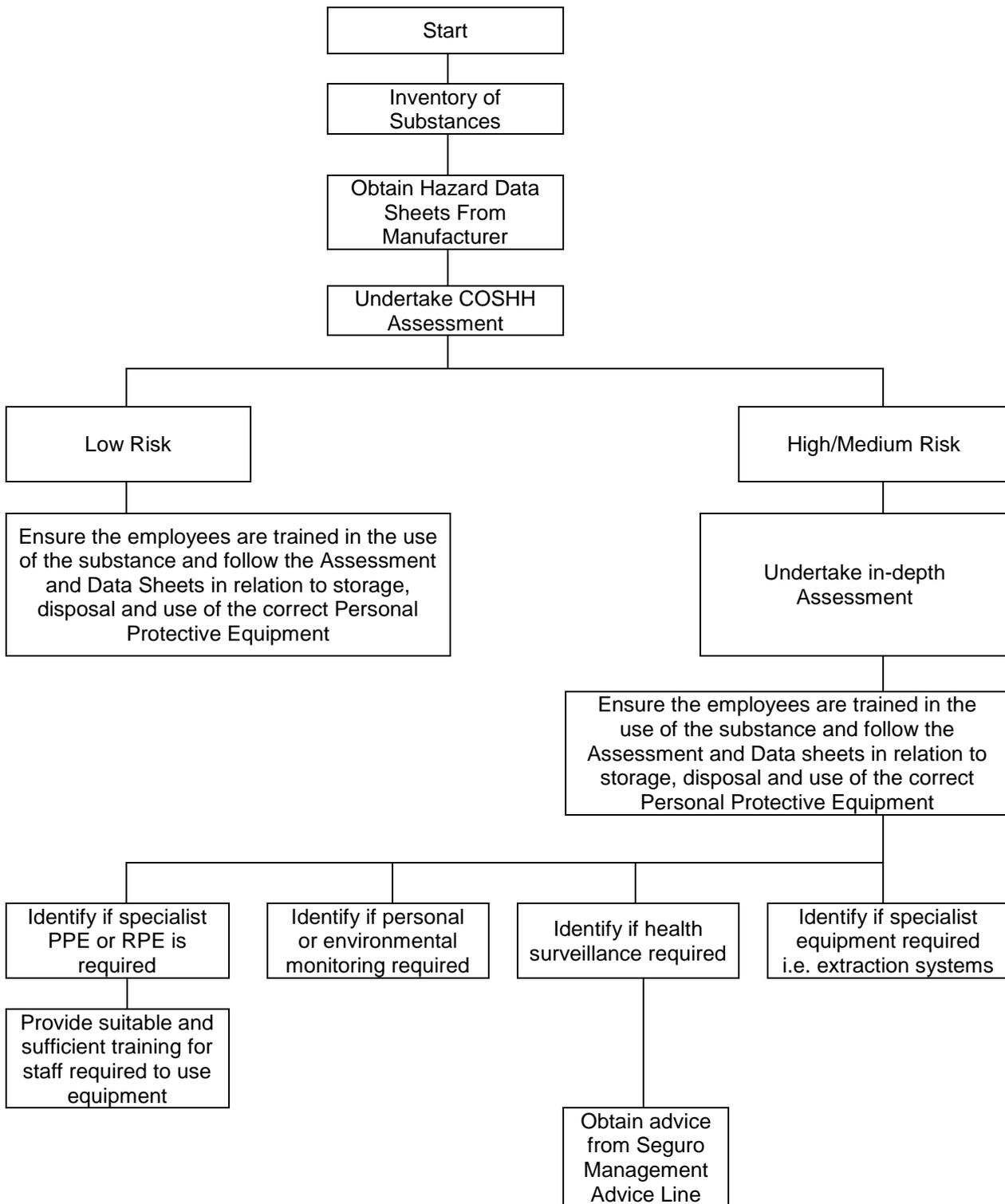
The company's approach to the regulations is to: -

- Familiarise itself with the legal requirements.
- Identify and list what substances are used within the company.
- Assess the risks to health from working with the substance.
- Introduce all the necessary control measures to safeguard all employees and other persons who may be affected by the company's undertakings.
- Decide what additional precautions may be required.
- Implement the precautions that have been decided.
- Monitor the precautions that have been implemented and introduce any technique/procedure that would improve safety.

All employees have a duty under the COSHH regulations to: -

- Take part in training programmes.
- Read container labels.
- Practise safe working.
- Report any hazard or defect to the Manager.
- Use personal protective equipment provided.
- Store equipment and tools properly.
- Return all substances to their secure location after use.
- Use control measures properly.

COSHH assessment flow chart



Labelling of containers

The company recognises the need to ensure that all chemical labelling on containers that are used by the company are clear and concise to ensure that risks to staff are reduced to the minimum.

It is the policy of the company to mark containers used to hold a temporary preparation with a suitable marker pen advising of the contents.

Any container used to store hazardous preparations will be identified with the appropriate warning symbol(s) and warning phrase. Due to lack of space on smaller containers i.e. 125ml or less it may not be possible to write the warning phrase, therefore this may be omitted.

It is a legal requirement of the Chemical (Hazardous Information and Packaging) Regulations (CHIP) to ensure that all chemical substances that are supplied be correctly labelled. Therefore any chemical substances that are delivered to the company without appropriate documentation will be rejected and returned to the supplier. Guidance on what labelling is required will be obtained from the hazard data sheet supplied with the substance.

3.05 Disciplinary rules

The company believes that health and safety is a critical factor that needs to be taken into account when running a business. To enable the company to control safety, a number of safety rules have been drawn up and have been issued to members of staff.

Failure to comply with these rules may result in employees being subject to disciplinary action. Employees may be disciplined for gross misconduct if after investigation the company believes that they have acted in any of the following ways: -

- Deliberately breaking any written safety rules.
- Removal or misuse any piece of equipment, label, sign or warning device that has been provided by the company (or its agents) for the protection and safety of its employees.
- Use of a naked flame in a no smoking area.
- Failing to follow laid down procedures for the use of flammable or hazardous substances, toxic materials, items of lifting equipment
- Behaving in any manner that could lead to accidents, including horseplay, practical jokes etc.
- Undertaking any action that may interfere with an accident investigation.

Prior to undertaking any disciplinary action the Managing Director will contact Seguro Management Ltd's advice line for the appropriate guidance.

3.06 Display screen equipment (DSE)

The company recognises that the incorrect use of display screen equipment may result in some users suffering from upper limb disorders.

The organisation will endeavour to eliminate these issues through good workplace and job design, information and training.

Employees will be encouraged to follow any system developed by the company for display screen equipment.

The display screen assessments will be made available to all employees and will be readily available for inspection. Employees who are required to use display screen equipment will be provided with all relevant information, instruction and training resulting from the risk assessment.

The assessments will be reviewed and updated annually or when significant changes take place.

If the DSE user requests an eye test the company will meet the cost. If the test highlights the need for corrective lenses for VDU (visual display unit) use the company will meet the cost for the basic corrective lenses required.

Display screen assessments will be carried out by the Managing Director.

The results of the display screen assessments will be communicated to relevant employees by the Managing Director.

The Managing Director will ensure that employees are following the systems laid down for their safety.

Office based employees will report any display screen equipment issues to their respective Manager.

3.07 Electricity

Electricity cannot be heard or seen yet it can kill if used incorrectly. A small electric shock from an electrical hand equipment may not be sufficient to kill but it may be capable of throwing you off balance, which could result in a fall from a height.

All electrical equipment used by the company will be selected carefully to ensure it is suitable for the environment in which it is used.

Movable and portable electrical equipment will be inspected, tested and maintained on a routine basis, depending on the use and application of the particular item and all employees who are required to use electrical equipment will be trained in accordance with the manufacturer's instructions. Any equipment brought onto client premises by other companies or employees will be logged and also be subjected to portable appliance inspection, testing and maintenance.

Any defective equipment will be removed from use immediately until such time as it can be repaired, with remedial action being recorded. Under no circumstances will any makeshift or temporary electrical repairs be made on any electrical equipment.

Portable appliance testing

The company defines portable appliances as equipment which is not part of a fixed installation but is, or is intended to be, connected to a fixed installation, or a generator, by means of a flexible cable and either a plug and socket or a spur box, or similar means. It includes equipment that is either hand held or hand operated while connected to the supply, or is intended to be moved while connected to the supply.

The Managing Director is responsible for ensuring that all portable electrical appliances are maintained in a safe condition and inspected at suitable intervals, depending on the use and application of the particular item. Any equipment brought onto a client premises by employees or agency worker will also be logged and subjected to portable appliance inspection, testing and maintenance. The results of completed inspections will be recorded in the Portable Appliance Register.

In addition, all employees who are required to use electrical equipment will be trained in accordance with the manufacturer's instructions.

Portable electrical appliances will only be used for the task for which they are intended and the lead will be suitably positioned to prevent damage, entanglement or trip hazards.

Experience of operating the maintenance system over a period of time, together with information on faults found, will be used to review the frequency of inspection and whether and how often equipment and associated leads and plugs should receive a combined inspection and test.

Any defective equipment will be removed from use until it can be repaired, and these repairs will be recorded. All items of equipment that cannot be repaired will be withdrawn from use and disposed of. Under no circumstances will any makeshift or temporary electrical repairs be made on any electrical equipment.

All reasonable steps will be taken to secure the health and safety of employees who use, operate or maintain electrical equipment. The company acknowledges that work on electrical equipment can be hazardous and therefore the company will take steps to reduce the risks so far as possible. The implementation of this policy requires the co-operation of everyone either directly employed by the company or by another contracted company.

The Line Managers are responsible for ensuring that persons within their control are not injured by electrical wiring or equipment used within their areas of responsibility. This will be accomplished by performing pre-use visual checks identifying hazardous activities, reporting defects, (for rectification by qualified persons), providing safe systems and where necessary permits to work to control any such hazardous tasks. The company will also: -

- Ensure that electrical installations and equipment are installed in accordance with the IEE (Institute of Electrical Engineers) Wiring Regulations as amended, and a certificate of inspection obtained for retention for record purposes.
- Maintain the fixed installation in a safe condition by carrying out routine safety testing.
- Identify and mark all main circuit breakers/isolators to ensure all persons understand how to isolate the equipment or building services safely in the event of an emergency.
- Inspect and test portable and transportable equipment as frequently as required.
- Promote and implement a safe system of work for maintenance, inspection and testing.

All employees must co-operate with management; use the protective and safety equipment provided; not endanger themselves or others; report hazardous or dangerous operations; follow the training and guidance provided to prevent injury to themselves and others; comply with safety rules and use work permits where applicable.

Portable appliances in office premises

The company will introduce testing for Portable Electrical Appliances in office premises in accordance with the following health and safety executive guidance for offices and low risk environments: -

Suggested initial intervals

Equipment/ Environment	User Checks	Formal Visual Inspection	Combined Inspection & Testing
Battery operated (less than 20 volts).	No	No	No
Extra low voltage (less than 50 volts AC) e.g. telephone equipment, low voltage desk lights	No	No	No
Information technology e.g. desktop computers, VDU screens	No	Yes 2-4 years	No if double insulated – otherwise up to 5 years
Photocopiers, fax machines: not handheld. Rarely moved	No	Yes, 2-4 years	No if double insulated – otherwise up to 5 years
Double insulated equipment, Not handheld. Moved occasionally e.g. fans, table lamps, slide projectors	No	Yes, 2-4 years	No
Double insulated equipment: handheld e.g. some floor cleaners	Yes	Yes, 6 months – 1 year	No
Earthed equipment (class 1) e.g. electric kettles, some floor cleaners	Yes	Yes, 6 months- 1 year	Yes, 1-2 years
Cable (leads) and plugs connected to the above	Yes	Yes 6 months- 4 years depending on the type of equipment it is connected to	Yes 1-5 years depending on the type of equipment it is connected to

3.08 Fire precautions

Fire precautions at the offices

The Managing Director will ensure that: -

All employees receive comprehensive induction before commencing work, to ensure that they are fully aware of all the arrangements in place during the evacuation procedure.

A register of employees is kept up-to-date at all times. This register must be available for inspection at all times and will be taken to the fire assembly point in the event of an evacuation for the purpose of calling the roll.

The requirements for employee training in fire safety are adhered to.

A fire logbook is kept up to date with all relevant records relating to fire safety and ensure that it is made available for inspection by the local authority fire brigade.

All fire-fighting equipment is tested on a regular basis as per the manufacturer's guidelines and records kept.

A fire evacuation drill is carried out at least annually which will be recorded in the fire logbook.

A fire risk assessment is undertaken within the workplace, outlining who may be affected by a fire along with any special requirements that may be identified.

A regular check is made to ensure escape routes and doors are not obstructed. Fire exit doors should be unlocked and available for use at all times when persons are in the building. Fire doors should be closed at all times and not wedged open.

A regular check should be made to ensure that fire escape routes do not become obstructed or altered in any way. If this does become the case, then a new route must be chosen, with new signs posted and all operatives advised of the changes. Relevant fire plans must also be altered to reflect any changes made.

In the event of a fire, the safety of a life shall override all other considerations, such as saving property and extinguishing the fire.

The company does not expect employees to fight fires, however, extinguishing action can be undertaken if it is safe to do so. On no account should a closed room be opened to fight a fire.

Re-entering the building is strictly prohibited until the incident control officer from the emergency services declares that it is safe to do so. Silencing of the fire alarm system should never be taken as an indication that it is safe to re-enter the building.

Employees should report any concerns regarding fire safety to management, so that the company can investigate and take any remedial actions that may be necessary. The hazard detection form can be used for this function.

Record keeping

The following records will be kept: -

- Details of maintenance checks of fire fighting apparatus and warning and detection equipment
- Records of fire alarm tests and practice evacuations
- A copy of the safety evacuation plan
- Records of all information, instruction and training provided

Fire prevention

All electric equipment will be maintained in a safe condition and be cleaned to ensure that dust etc does not block up the ventilation points.

The use of electrical extension leads will be kept to the minimum and they must not be channelled through doorways unless adequately protected from damage.

Electrical faults must be reported to your management as soon as possible.

At the end of the working day electrical equipment must be turned off, unless there is an operational reason to keep the equipment running.

Fire action (Client Premises)

Employees must raise the alarm immediately if: -

- Fire is discovered
- Flammable / toxic gas build up is suspected
- Major accident/ incident occurs
- If the fire representative for the premises is not present, telephone the emergency services by dialling 999.
- Ask for the fire brigade and give them the premises telephone number.
- Upon connection with the fire service state slowly and distinctively: -

This is A24 Group we are presently located at and a fire has broken out.

- State the location of where you are located clearly.
- Do not replace the receiver until the operator has confirmed your information.

On hearing the alarm

- All employees are to evacuate the premises immediately and congregate at the designated fire assembly point.
- Under no circumstances are rescue attempts to be made.
- Do not re-enter the area until senior Fire Officer has given the all clear.

A nominated employee is to take the roll call and ensure that everyone is accounted for.

Fire action – vehicles

Upon discovery of a fire on board your vehicle: -

- Halt your vehicle in the safest possible place. If possible, away from the main highway.
- Telephone the emergency services on your mobile phone or by the nearest available phone.
- When the operator answers, ask for the fire brigade and give the telephone number of your mobile or public phone.
- When connected, state slowly and distinctly: -

“This is A24 Group I have a fire on my vehicle.”

State the location of the vehicle.

- Do not replace the receiver until this information has been correctly acknowledged.
- Stand in a safe location clear of the vehicle and await the fire brigade.
- Do not touch any area or item of the vehicle that may have been burnt.

Fire action (offices)

If you discover a fire: -

Immediately notify the senior person present.

Attack the fire (if trained to do so) with appliances provided but without taking personal risks.

The senior person present will contact the fire brigade immediately by telephone by: -

- Lifting the receiver, select a line and dial 999.
- Give the operator the company's telephone number and ask for the fire brigade.
- When the fire brigade replies give the response distinctly:

“We have a fire at A24 Group” and give the operator the address.

Do not replace the receiver until the fire brigade has repeated the address.

Call the fire brigade immediately to every fire or on suspicion of a fire.

On hearing the alarm for a fire or notification of a fire: -

- Evacuate the building by the nearest available **SAFE** exit and proceed to the assembly point by the yard gate.
- The senior person present will take charge of any evacuation and ensure that no one is left in the building.

Use the nearest available **SAFE** exit

Do not stop to collect personal belongings

Do not re-enter the building until told to do so by the senior Fire Officer

3.09 First aid

Fixed premises

First aid kits provided will only contain items that the First Aider has been trained to use. They will not contain medication of any kind and will always be adequately stocked. Within our office premises notices are displayed in prominent areas and information has been detailed in the employee handbook, giving the names of first aid trained staff and the location of first aid equipment.

After all accidents, details must be recorded in the accident book. To ensure compliance with data protection legislation the completed accident book forms will be removed and filed in the main offices.

If employees or their representatives wish to inspect individual records, they can contact the Managing Director who will make them available for inspection.

First Aiders are qualified personnel who have received training and passed an examination in accordance with health and safety executive requirements. First Aiders will be provided with re-training at regular intervals in order to ensure that their skills are maintained.

The Line Manager is responsible for determining the level of first-aid cover required, by undertaking a risk assessment taking fully into account the accident rate at the company.

ALL accidents, no matter how small, must be required to be reported. Even a scratch can become serious if not properly treated so it is important that the following procedure is followed: -

Seek medical attention from the company's First Aider or Appointed Person.

The names of the First Aiders or Appointed Persons are written on the first aid notices, which can be found in prominent locations around the office.

All first aid incidents will be recorded by the person administering first aid treatment. The records will include the name of the casualty, date, time and the circumstances of the accident with the details of the injury sustained and any treatment given.

The following arrangements should be followed in order to ensure that suitable and sufficient provision of first aid personnel and equipment are available at the workplace: -

- First aid personnel must inform their Manager when their training certification period is nearing expiry, (3 months prior to expiry) or if they wish to be taken off the approved First Aiders list.
- Management must ensure that employees are familiar with the identity and location of their nearest First Aider and first aid box.
- Management must ensure that easy access to first aid equipment is available at all times.
- Professional medical assistance must be summoned where necessary.
- Ensure that details of all accidents are reported and entered into the accident book. All major injuries must be reported to the health and safety department as soon as possible.

First aid on client premises

The company recognises it is a statutory duty to provide equipment and facilities which are adequate and appropriate in the circumstances, for employees if they are injured or become ill at work. It therefore is company policy to assess the risks in their operations and then provide adequate trained persons and facilities on all their contract work premises.

First aid kits provided will have enough equipment to cope with the number of employees on duty and only contain items that the First Aider has been trained to use. First aid kits will only contain specified first aid materials and nothing else (e.g. aspirin, creams or sprays)

Where possible, notices will be prominently displayed on all work areas giving the location of the First aid equipment.

All company vehicles will carry travelling first aid kits.

In the event that the company deploying a member of staff to another employer, that organisation will be responsible for maintaining suitable first aid facilities. Whoever is controlling the work location must ensure that all first aid arrangements are advised to all operatives as part of their induction process.

The person administering first aid treatment will record all accidents. The records will include the name of the casualty, date, time and the circumstances of the accident with the details of the injury sustained and any treatment given.

All accidents, no matter how small, must be reported in accordance with the company's accident reporting procedure.

3.10 Hazard detection procedures

To encourage health and safety awareness in the workplace, a formal written hazard reporting system is provided to ensure that all employees have a means of reporting hazards that may be present in their place of work.

When a hazard or any shortcomings in our health and safety arrangements has been identified employees are required to bring it to the attention of management. It is the management's duty to assess the situation and introduce any necessary control measures to ensure the workplace remains safe at all times.

The workforce is encouraged to use this procedure, which will improve the attitude of the workforce towards safety and will aid the company in consulting with employees.

If a hazard is detected that could cause injury or ill health, employees will: -

- Complete part one of the hazard report form.
- Liaise with a Director or there manager who will carry out the necessary remedial action.

Near miss (Please read in conjunction with advice given at 3.03 – accidents)

Near misses are accidents that nearly happened, e.g. potholes, trailing cables or faulty equipment. These need to be reported when they happen so that action can be taken to put them right. They also need to be recorded (this can be done at a later stage) even if the problem is put right immediately. A near miss can be recorded in the following way:-

- The Managing Director or there line manager will be contacted and the incident explained along with the location and type of problem. The Managing Director/Line Manager will then ensure that the correct remedial action is undertaken.

3.11 Health surveillance

The company takes health and welfare seriously. It is the company's aim to create an environment which is free of occupational risk, occupational illness and to encourage a culture of health and fitness for staff.

The company aim to achieve this with the help, involvement, contribution and commitment of all members of staff.

The company recognises that some health and safety legislation requires employers to provide health surveillance for their employees.

It is company policy to introduce health surveillance only in a situation where the health risks cannot be adequately controlled by other means.

Risk assessments of the company's activities will identify if and where surveillance is appropriate.

The company is aware that some activities may require the introduction of health surveillance, special consideration will therefore be taken at the risk assessment stage for activities involving the following potential health risks: -

Activities, which may involve or result in: -

- Excessive noise
- Solvents fumes, biological agents or other hazardous substances

The company also recognises that although specific legal requirements do not exist the following operations may also require a degree of monitoring by means of health surveillance.

Activities, which may involve or result in: -

- Work related upper limb disorders
- Whole body vibration
- Manual Handling
- Night Working

Further advice on the appropriate course of action will be sought from the Employment Medical Advisory Service wherever necessary.

If employees are aware of any practises, procedures or systems that the company can improve or which are adversely affecting their health, they are advised to contact the Managing Director/Line Manager.

The company employees are encouraged to identify if they have any physical or medical conditions that could be adversely affected by undertaking work activities on behalf of the company.

If any employee has any concerns about their health or if any screening questionnaire shows that further medical surveillance is required, then the company will send the employee to a designated company Doctor for the appropriate medical examination.

3.12 Housekeeping

It is company policy that good housekeeping, cleanliness and tidiness are the first steps in prevention of accidents at work.

A tidy work area is safer and is beneficial to public relations therefore it is essential that the work area is kept in a clean and orderly condition at all times.

The Line Manager will ensure as far as is reasonably practical that the following actions are taken wherever practicable: -

- Floors, walkways stairways and work areas must be kept clear of tripping hazards
- All combustible rubbish will be cleared away on a regular basis and disposed of in the authorized waste bins.
- Disposal of any hazardous materials will be undertaken according with all laid down environmental policies and procedures. Special waste will only be removed and disposed of by authorised contractors.

As the arrangements will vary from client to client due to the nature of the task being undertaken, an assessment will be completed at the beginning of the package/activity to ascertain what housekeeping control measures are required.

Employees are required to report any housekeeping problems to the Managing Director/Line Manager.

3.13 HSE powers of inspectors

The company is aware and appreciates the powers, duties and responsibilities of Enforcing Officers and we will at all times co-operate with them in all aspects of their duties.

An Inspector may visit any work premises, dept, workshop or office (offices covered by EHO officers) at any reasonable time for the purpose of ensuring that the provisions of any Acts or Regulations are being complied with. Alternatively, an Inspector may visit to specifically investigate the circumstances of an accident or dangerous occurrence or to give advice on a matter.

If an Inspector discovers a contravention of a specific piece of legislation during their inspection, they can either: -

- Issue a Prohibition Notice.
- Issue an Improvement Notice.
- Advise that they intend to prosecute.
- Give instructions and confirm them in writing.

When visiting the company's work locations a member of the company should accompany all Inspectors during their inspection and they should make a note of any irregularities mentioned by the Inspector during the inspection.

It is the company's policy that any visiting Inspectors should be treated with courtesy and given every co-operation during the course of their inspections.

It must be stressed that any visiting Inspectors have the right to free access to the whole of the operation, to inspect any records or documents which are legally required to be kept, to interview any persons and to take a statement of fact, take samples, photographs and make recordings.

Every Inspector is appointed in writing and carries a warrant card, which they must produce upon request. This right should be exercised by any member of the company if they feel they have reason to doubt that the person is not an Inspector.

3.14 Information, instruction and training

It is the company's policy to provide all employees with suitable and sufficient information, instruction and training. This is provided not only to ensure the company complies with statutory legislation but also to secure a safe and healthy working environment for all employees and visitors who may be affected by the company's undertakings.

Training is provided for all employees: -

- On recruitment into the company.
- When moved to another task or when promoted.
- When the process, equipment or system of work is changed.
- All health and safety training will be undertaken during working hours wherever possible.

It is the company's policy to ensure all management are suitably trained to implement the health and safety policy as well as being trained to undertake specific tasks.

All training will be recorded and retained on each individual employees personal file for future reference by the Managing Director.

The Line Managers will ensure that the company procedure for information, instruction and training is adhered to.

Employees will report any problems to the Managing Director/Line Manager.

3.15 Lifting equipment and lifting operations

The company defines lifting equipment as any equipment certified for lifting; this includes hoists used for lifting patients in and out of baths, beds etc. It also includes lifting accessories such as slings and eyebolts.

Regulations require that lifting equipment be: -

- Strong and stable and marked to indicate safe working loads
- Positioned and installed to minimise any risks
- Used safely, i.e., the work is planned, organised and performed by competent people
- Thoroughly examined and inspected by competent people

The company may use equipment of this type for various activities to be carried out during the course of there work; therefore, the company will ensure that:

- Competent people carry out all lifting operations in a well-planned and supervised manner
- Lifting equipment used to lift people is clearly marked and safe for such a purpose
- All lifting equipment is thoroughly examined before being used for the first time
- Equipment used for lifting people, e.g. hoists are thoroughly examined every six months

Risk assessments will be carried out by the Line Manager to identify what risks arise for the use of lifting equipment and these will be made available to all employees and be available for inspection.

Where necessary, the company will also develop safe working procedures for the use of this equipment and all relevant employees will be trained in and adhere to these procedures.

Should changes in legislation or practice occur or should a reportable injury occur, risk assessments and/or safe working procedures will be reviewed and employees will be informed of any changes.

3.16 Lone working

The company recognises that employees can sometimes be required to work alone and as such will as far as reasonably practicable protect employees against the additional risks such work can entail.

It should be recognised that lone working can be carried out safely if managed and controlled effectively.

The company recognises its duty under the Health & Safety at Work (HSW) Act 1974 to maintain safe working arrangements and under The Management of Health & Safety Act Work Regulations 1992 to carry out risk assessment of the risks to which their employees are exposed, these risks include those associated with lone working.

All staff who undertakes lone working will be identified and an assessment carried out.

Technological advances in communication media and other equipment will be researched and reviewed and where practical implemented to ensure the safety and security of lone workers.

Where it is identified that the level of risk is such that it cannot be effectively controlled by other means then lone working will not be allowed.

Risk Assessments need to be reviewed regularly and updated accordingly – in respect of the location and details of patients/service users/other people that may be visited by staff. Risk assessments should be communicated/available for Lone Workers ahead of any visit they make.

Where there is a history of violence from an individual/service user and/or the location is considered high risk, a risk assessment must be conducted to establish whether the Lone Worker must be accompanied by, a colleague, by a security officer.

Lone working risk assessments will be carried out by the Line Manager.

The results of the lone working risk assessments will be communicated to relevant employees by the Line Manager.

The Line Manager will ensure that employees are following the systems laid down for their safety.

3.17 Manual handling

The company recognises and accepts its responsibilities as an employer to provide a safe and healthy working environment for all its employees as required under the Health and Safety at Work Act 1974.

The company's objective is to minimise musculoskeletal disorders to staff caused by manual handling tasks and comply with the requirements of the Manual Handling Operations Regulations 1992.

This policy covers both manual handling of objects and the moving and handling of clients. The company recognises its duty of care under common law to clients and relatives when delegating or involving them in moving and handling tasks.

The company will take reasonable steps to ensure that staff from outside agencies have received the appropriate training and information in relation to manual handling.

Minimal lifting policy

The primary duty placed on the employer under the Manual Handling Operations Regulations is to take all reasonably practicable steps to avoid the need for the employee to undertake hazardous manual handling tasks. This is especially true of "lifting". The process recommended is the use of handling equipment.

It is the company's position to work towards a "minimal lifting" policy in order to comply with legislation. All manual handling tasks posing a significant risk to staff will be assessed and recorded.

In relation to moving and handling of clients the following practices must be discontinued because of the history of causing injury to employees and client.

- The drag lift
- The orthodox lift
- Placing the patient's arms around the handler's neck
- Manual lifts from the floor (in a non-emergency situation)
- Manual lifts from the bed (in a non-emergency situation)
- Lifting the full body weight of a client

The only exception would be in a life threatening situation where there is no immediate alternative available to deal with the situation; however, assistance should be called upon where possible.

The company is committed to the implementation of a safer handling policy based on the following principles:

Load Handling

A minimal lifting approach needs to be applied to load handling situations based on a full risk assessment, which takes account of factors such as size, shape, weight and design of the load. Mechanical aids should be utilised whenever possible.

Whenever possible the risk of injury from load handling problems should be reduced by implementing measures at strategic level. Good planning and design at the workplace will often eliminate hazards at an early stage.

Safe systems of transportation will be readily available for the movement of goods, supplies and equipment throughout the company/client premises where possible.

Client Handling

Each client will be individually assessed by taking into account their individual needs, capabilities and circumstances, the rehabilitation and development needs of clients will also be considered along with the importance of staff and client safety.

A problem solving approach will be adopted which considers the use of a variety of handling methods and equipment to reduce the risk of injury. Client independence will be encouraged at all times.

Following assessment a written individual handling plan will be produced which will be reviewed at appropriate intervals or when circumstances change.

The aim of the policy is to avoid manual lifting of clients in all but exceptional life threatening situations. Staff should not be expected to put their safety at risk by lifting manually. Hoists, sliding aids and other specialised equipment should be used.

Training

All new members of staff will receive information regarding this policy as part of the induction programme.

Manual handling of objects training will be provided to relevant staff as identified by line managers.

Moving and handling of clients training which includes training in the use of hoists and associated equipment will be provided to all relevant staff as identified by managers.

Lifting Equipment – client hoists

Regular maintenance and inspection of lifting equipment will be carried out to comply with the Lifting Operations and Lifting Equipment Regulations. All lifting equipment will be checked by staff before use.

Process/Procedure

- A suitable and sufficient assessment of all manual handling tasks posing significant risk of injury to staff must be carried out.
- An assessment form should be completed for all significant risk manual handling tasks.
- Where needs are identified a patient/client handling risk assessment should be completed and care plan development to reduce the risk of injury to both client and staff.
- Where there are no moving and handling needs identified this must be recorded in the clients care plan.
- All assessments are to be reviewed in light of any changes to the task, individual, load or environment.

The line manager will ensure that staff are following the systems laid down for their safety.

Employees will report hazardous handling activities to there line manager.

3.18 Mobile phones

Using a phone whilst driving

The use of a hand-held phone or similar hand-held device whilst driving has been prohibited since December 2003.

Regulations make it an offence for a person to drive a motor vehicle if they cannot have proper control of the vehicle.

Since February 2007, Section 26 of the Road Safety Act 2006 set the fixed penalty for using a hand-held phone while driving at £60 and three penalty points. The same penalties apply for not having proper control of a vehicle - a measure that can also be used where a driver has been distracted by using a hands-free mobile phone.

In order to ensure the safety of staff, hands-free kits will be provided for employees who are required to use mobile telephones whilst working away from the company premises.

Under no circumstances are members of staff permitted to use hand-held telephones or any similar hand-held device e.g. Personal Data Assistant (PDA) or Palm Pilot whilst driving. A hand-held device is something that "is or must be held at some point during the course of making or receiving a call or performing any other interactive communication function."

The prohibition also applies whilst stopped at traffic lights or during other hold-ups that may occur during which a vehicle can be expected to move off after a short while.

Provided that a phone can be operated without holding it, then the law does not prohibit hands-free equipment. However, the Government advises that drivers should NOT use a mobile phone in the car at any time and drivers still risk prosecution (for failure to have proper control) even if they use hands-free phones when driving.

General use of mobile phones

- During meetings, users should be considerate of other people and avoid causing a distraction.
- Mobile phone users may be more at risk from slips and trips if walking around whilst using them so extra care should be taken.
- Radio signals can cause interference with sensitive electronic equipment such as that found in hospitals or airports. Always observe warning signs and switch off the phone where required/requested to do so.
- Do not press the telephone to your ear or the side of your head; try to leave a gap between your ear and the handset if possible.
- When making calls to, or receiving calls from mobile phones, always ask whether it is safe to speak as the person you are communicating with may be driving at the time.
- Do not leave mobile phones on display in a vehicle nor use them in areas where you feel at risk of robbery. If challenged give the equipment up immediately.

3.19 Monitoring, audit and review

This Health and Safety Policy will be formally reviewed every 12 months by the Company Director in conjunction with the Safety Advisors of the Company and any alterations ratified as necessary. It will also be reviewed to take into account where new legislation or European Directives are amended and/or are introduced, following the introduction of new technology and or working practices or changes in Company activities or circumstances.

The Director on the recommendation of the Safety Advisors will consider alterations and amendments, which become essential between review dates.

Simply, this Policy is a live document, which will be reviewed by the Director for Safety:

- Annually
- When new legislation or European Directives are amended and/or are introduced.
- The introduction of new technology and or working practices
- Change in Company activities or circumstances.

The issue of the Health and Safety Policy and any amendments thereof shall be made solely by the Company with the assistance of its Safety Advisors.

A formal recorded system of inspection, monitoring and review, is established to enable all tiers of management to assess control measures and identify problem areas.

These include Senior Managers carrying out their own formal, independent inspection on a three monthly basis.

Independent monitoring and auditing by the Safety Consultants supplement these arrangements.

The Managing Director will review these reports and all subsequent corrective actions.

The company are committed to good Health and Safety Management and with the assistance of the Safety Consultants will review the health and safety policy annually and/or when new legislation or directives, Approved Codes of Practice and guidance are introduced or when changes in company activities are introduced as industry best practice.

3.20 New and expectant mothers at work

The Management of Health and Safety at Work Regulations require all organisations to assess workplace risks for all employees. Where women of childbearing age are employed, the assessment must also cover risks specific to new and expectant mothers.

When an employee notifies Conduct Services Ltd in writing that she is pregnant, has given birth within the last six months or is breast-feeding and after taking normal precautions, a significant risk to her health remains then the company will: -

- Temporarily adjust her working conditions and/or hours of work, if this is not reasonable or will not reduce the risk the company will;
- Offer her suitable alternative work, or if this is not feasible;
- Suspend her from work (with paid leave) for as long as necessary to protect her and the child's health and safety.

All female employees are instructed within their contracts of employment that they must inform the company management as soon as they are aware that they are pregnant to enable the appropriate control measures to be implemented.

When any work involves dealing with members of the public there is a risk of contracting the rubella virus (german measles), it is advisable for all staff that are planning a pregnancy to check their immunisation prior to trying to conceive, screening for the immunity is routinely checked in antenatal clinics.

3.21 Personal protective equipment (PPE)

The company will compile full risk assessments for all tasks that are undertaken and in turn will assess the need to provide for use, suitable and sufficient personal protective equipment/clothing to all appropriate employees. All PPE provided will be evaluated to ensure that it complies with current standards of suitability, appertaining to the foreseeable risk exposure, and will be affixed with the CE conformity mark, which denotes manufactures standards.

The company will provide all appropriate PPE at the company's expense and will replace any item when it becomes damaged or unserviceable. All employees who are required to wear any personal protective equipment will be provided with suitable instruction and training on how to correctly use the equipment, along with the procedures for having any damaged or defective equipment replaced.

A24 Group will compile detailed records for all equipment that is issued along with details of any training that has been given.

All employees should: -

- Use all PPE that is supplied to them correctly.
- Inspect PPE before use to ensure that it is suitable, clean and undamaged.
- Report defective PPE to their immediate superior.
- Report any discomfort or ill health when wearing the equipment.
- Not undertake any work unless the correct equipment is being worn.
- Store PPE correctly at all times.

3.22 Risk assessments

The company accepts that some of its activities could, unless adequately controlled, create risks to employees and others. Therefore in order to comply with the Management of Health and Safety at Work and to safeguard the health, safety and welfare of employees and others, the company will take all reasonably practicable measures to reduce those risks to an acceptable level. This is achieved by undertaking suitable and sufficient risk assessments for all work activities undertaken within the company.

The aim of the risk assessment process is to: -

- Identify hazards associated with the company's undertaking and any hazards associated with the premises.
- Identify any person who may be affected or injured by the hazards.
- Identify and implement appropriate control measures to eliminate or reduce the hazards to a safe level.

Nominated personnel will complete risk assessments for all work activities undertaken by the company and will strive to ensure that the documentation is reviewed if circumstances change. It is company policy to ensure that all persons who are required to compile the assessments attend an appropriate training course to ensure they are competent to undertake risk assessments.

The training that is given to employees will enable them to: -

- Identify all hazards associated with the company's activities.
- Identify when generic assessments are not appropriate, due to the lack of control measures that would only be determined by a specific assessment.
- Enable them to implement the necessary control measures prior to anyone being placed in danger due to the hazard.
- Document the assessment process to enable the control measures to be disseminated to all relevant people.

The management will ensure that all employees and other interested parties are informed and instructed of the risks to which they may be exposed, in order that the work activities be completed in a safe manner as documented in the assessment.

The company will not employ or accept as a work placement any young person unless an assessment has been undertaken outlining any hazards to which they will be exposed. When the assessment is completed particular attention will be given to the following areas: -

- The inexperience and lack of awareness of risks along with the immaturity of the young person.
- The nature, degree and duration of exposure to any physical, biological and chemical agents to which the young person will be exposed.
- The type and use of work equipment that is required to be operated along with the way that it is handled.
- The extent of the health and safety training which is provided, along with details of any additional training that is required to be undertaken.

Procedures Management Follow when Completing Risk Assessments

Step 1

- Look for the hazards. Ignore the trivial and concentrate on the significant hazards that could result in serious harm or affect several people.
- List any hazards in column 1 of the assessment form.

Step 2

- Think about the people who might be harmed and how, taking into account people who may not be in the workplace at all times, e.g. cleaners, visitors, contractors etc.
- List the people who may be harmed in column 2 of the assessment form.

Step 3

- Decide whether the existing precautions are adequate or whether further precautions are required to be implemented.
- Ask the question, "Can I eliminate the hazard?" If not, "How can I control it?"
- List all the controls that are in place in column 3.

Step 4

- In column 4, risk factor, assess the likelihood of the event actually occurring and the severity of the event if an accident were to occur. When this has been determined, calculate the factor by multiplying the probability and the severity to decide whether the risks are determined to be low, medium or high.

Step 5

- List the further action needed to adequately control the risk.

Step 6

- Review your assessment at regular intervals and also any new process that is introduced into the company. It is important to ensure all assessments are recorded and distributed to the necessary people.

Risk assessment guidance sheet.

Column 1.	Significant Hazards.	(Examples)
	Slipping – Tripping Hazards Fire Chemicals Moving Parts of Machinery Ejection of Materials Noise Electricity Storage of Goods and Materials	Dust Fumes Manual Handling Pressure Systems Poor Lighting High/Low Temperatures Violence to staff (Robbery etc)
Column 2.	Who Might be Harmed.	(Examples)
	Office staff Maintenance staff Contractors Visitors	Machine operators Cleaners Members of the public (customers) Security staff
Column 3.	How is The Risk Controlled?	(Examples of Control measures)
	Information, Instruction, Training Safe Working Procedures Supervision Statutory Inspections (Portable Electrical Equipment, Lifting Equipment, Air Receivers etc)	Guarding Provision of Personal Protective Equipment Routine Inspections & Checks

Column 4. Risk Factor.

See Chart in the Seguro Management Ltd Stationery Pack.

What Further Action is Necessary to Control the Risk?

List any further actions that are required to improve the control measures in place and reduce the risk to a greater extent.

All actions noted in this column should be given a realistic timescale based on the following criteria: -

Magnitude of the Risk. (Life Threatening etc)	Availability of Parts and Equipment
Down Time	Financial Constraints

Completion and Review Date

6 or 12 months hence or if there is any significant change within the working process.

3.23 Safe systems of work

Introduction

It has been estimated that at least a quarter of all fatal accidents at work involve failures in systems of work – the way things are done. A safe system of work is a formal procedure which results from a systematic examination of a task in order to identify all the hazards and assess the risks, and which identifies safe methods of work to ensure that the hazards are eliminated or the remaining risks are minimised.

Many hazards are clearly recognisable and can be overcome by separating people from them physically e.g. using guarding on machinery. There will often be circumstances where hazards cannot be eliminated in this way, and elements of risk remain associated with the task. **Where the risk assessment indicates this is the case, a safe system of work will be required.**

Some examples where safe systems will be required as part of the controls are:

- Cleaning and maintenance operations
- Changes to normal procedures, including layout, materials and methods
- Working alone or away from the workplace and its facilities
- Breakdowns and emergencies
- Control of the activities in the workplace
- Vehicle loading, unloading and movements

Developing safe systems

Some safe systems can be verbal only – where instructions are given on the hazards and the means of overcoming them, for short duration tasks.

These instructions must be given by the line manager – leaving workers to devise their own method of work is not a safe system of work.

The law requires a suitable and sufficient risk assessment to be made of all the risks to which employees and others who may be affected by them are exposed. Although some of the assessments can be carried out using a relatively unstructured approach, a more formal analysis can be used to develop a safe system of work. Sometimes these may be carried out as a matter of policy, with the task broken down into stages and the precautions associated with each written into the final document. This can be used for training new workers in the required method of work. The technique is known as **job safety analysis**.

For all safe systems, there are five basic steps necessary in producing them:

- Assessment of the task
- Hazard identification and risk assessment
- Identification of safe methods
- Implementing the system
- Monitoring the system

Task assessment

All aspects of the task must be examined, and should be put in writing to ensure nothing is overlooked. This should be done by supervision in conjunction with workers involved, to ensure that assumptions of supervisors about methods of work are not confounded by reality.

Account must be taken of **what is used** – the equipment and substances, potential failures of equipment, substances used, electrical needs of the task; **source of errors** – possible human failures, short cuts, emergency work; **where the task is carried out** – the working environment and its demands for protection; and **how the task is carried out** – procedures, potential failures in work methods, frequency of the task, training needs.

Hazard identification and risk assessment

Against a list of the elements of the task, associated hazards can be clearly identified, and a risk assessment can be made.

Where hazards cannot be eliminated and risks reduced, procedures to ensure a safe method of work should be devised.

Definition of safe methods

The chosen method can be explained orally as already mentioned.

Simple method statements can be established, or a more formal method known as permit-to-work system.

All of these involve setting up the task and any authorisation necessary; planning of job sequences; specification of the approved safe working methods including the means of getting to and from the task area if appropriate; conditions which must be verified before work starts.

Implementing the system

There must be adequate communication is the safe system of work is to be successful. The details should be fully understood by **everyone** who has to work with it, and it must be carried out on each occasion.

It is important that everyone appreciates the need for the system and its place in the accident prevention programme.

Supervisors must know that their duties include devising and maintaining safe systems of work, and making sure they are put into operation, and revised where necessary to take account of changed conditions or accident experience.

Training is required for all concerned, to include the necessary skills, awareness of the system and hazards which it is aimed to eliminate by the use of safe procedures.

Part of every safe system should be the requirement to stop work when a problem appears which is not covered by the system, and not to resume until a safe solution has been found.

Monitoring the system

- Effective monitoring requires that regular checks are made to make sure that the system is still appropriate for the needs of the task, and that is being fully complied with.
- Checking only after accidents is not an acceptable form of monitoring.
- Simple questions are required – do workers continue to find the system workable?
- Are procedures laid down being carried out?
- Are the procedures still effective?
- Have there been any changes which require a revision of the system?
- A system devised as above which is not followed is **not** a safe system of work – the reasons must be found and rectified.
- Safe systems of work are associates of, not substitutes for, the stronger protection techniques of design, guarding and other methods which aim to eliminate the possibility of human failure.

Method statements

The key feature of method statements is that they provide a sequence for carrying out an identified task; some work activities must be done in sequence to ensure safety. In such cases, it is necessary not only to know what the control measures are, but also to carry out the work in a particular order.

Examples of activities where Health and Safety Executive expect method statements to be provided include demolition work, asbestos removal and structural steel erection.

Method statements usually contain more detail than risk assessments, and normally include the following information:

- Originator and date.
- Identification of individual(s) who will be responsible for the whole operation and for compliance with the method statement. Key personnel responsible for particular operations may also be named.
- Training Requirements for personnel carrying out the tasks, which have a competency requirement. (Examples are crane and forklift drivers, testing and commissioning staff.)
- Details of access equipment, which will be used, safe access routes and maintenance of emergency routes.
- Equipment required to carry out the work, including its size, weight, power rating, and necessary certification.
- Locations and means of fixing the stability of any lifting equipment to be used.
- Material storage, transportation, handling and security details.
- Detailed work sequence including hazard identification and risk control measures, including co-operation between trades which may be required, limitations for part-completion of works and any temporary supports or supplies required.
- Details of all personal protective equipment and other measures such as barriers, signs, local exhaust ventilation, rescue equipment, fire extinguishers, and gas detection equipment.
- Any environmental limitations, which may be applicable, such as, wind speed, rain, and temperature.
- Details of measures to protect third parties who may be affected.
- The means by which any variations to the method statement will be authorised.

Legal requirements

Section 2(2)(A) of the Health and Safety at Work etc. Act 1974 requires the provision and maintenance of safe systems of work that are, so far as is reasonably practicable, safe and without risks to health.

Under the employer's general duty of care at common law, a failure to do so gives rise to a claim based on the allegation of the employer's negligence.

Specific legislation may require the use of formal permits-to-work, either directly or by implication as a means of compliance.

Further requirements for safe systems of work following upon risk assessments are contained in the Management of Health and Safety at Work Regulations 1999, which also place duties on employees to follow the systems and procedures set up for their protection following risk assessments.

3.24 Safety signs

The company recognises that it is important that all staff take notice of warning signs at work, as they are in place to safeguard people's health and safety. It is therefore the company's policy to follow all guidance within the Health and Safety (Safety Signs and Signals) Regulations.

All safety signs will be colour coded in accordance with the following guidelines: -

- White circle with red edging and a diagonal line indicate **PROHIBITED** for example no smoking.
- Blue signs indicate that it is **MANDATORY** to carry out an action such as the wearing of personal protective equipment.
- A triangular sign with black edging and a yellow background indicates **WARNING** of a Hazard and should contain a black pictogram.
- Green signs identify or locate safety equipment as well as marking emergency escape routes.

The company acknowledge that signs must comply with the regulations, however where necessary the company will design the signs to maintain a safe environment.

Where there is a risk to health and safety that cannot be controlled by any other means signs will be displayed for example where: -

- There is a risk of exposure to excessive noise,
- There is low headroom.
- Speed needs to be restricted.

It is company policy to ensure that any signs which are provided for safety reasons are: -

- Maintained in a good condition.
- Positioned in the correct location.
- Explained to all members of staff to ensure that they are aware of the meaning of the signs and the correct actions to be taken.

3.25 Smoking in the workplace

Smoking is the main cause of preventable disease and premature death. It is now recognised that smoking not only affects the smoker but also affects non-smokers through passive smoking i.e. where non-smokers inhale smoke from other people's cigarettes.

Under Section 2 of the Health and Safety at Work Regulations, all employers must protect the health of employees and provide a healthy and safe working environment. Therefore it is the aim of A24 Group to implement a suitable policy to control smoking within areas under their control.

A24 Group have implemented a strict no smoking policy which is enforced through disciplinary action.

Breaches of the above will be dealt with through education and counselling. As a last resort if counselling and negotiation fail, staff who refuse to observe the policies will be subject to normal disciplinary procedures.

All visitors and staff are expected to abide by the policy and it is the responsibility of all members of staff to instruct them of the company requirements as necessary.

3.26 Stress in the workplace

It is the company policy to address all work-related illnesses and in particular stress. To control, reduce or eliminate it so far as is reasonably practicable.

The Health and Safety Executive has defined health and safety as both the physical and mental wellbeing of all persons employed by the company. The company recognises that personnel are the company's most valuable assets and that any problem associated with work-related stress is a management duty to control as far as is reasonably practicable.

A certain amount of stress provides high motivation, a positive outlook and good performance. However, it is when these personal levels are exceeded that detrimental health effects may appear. Whilst stress-related problems of short duration often resolve themselves, it is the long-term stresses that the company aim to address.

Through the risk assessment process, the company will continue to identify hazards and assess all mental and physical risks to health and safety with the objective of reducing them, as far as is reasonably practicable.

The main problem with stress is the self-realisation that we are actively suffering from it! Others affected by our stress symptoms tend to shy away from broaching the subject as it may be construed as interference or just being nosy.

Stress is usually brought about by an accumulation of minor irritations that cannot be resolved in the time scale we wish and/or with the desired outcome. But, there may be one single event or set of circumstances that combine to provide the additional stress overload. Some examples are: -

Possible environmental stressors

- Noise.
- Temperature.
- Overcrowding.
- Humidity.

Possible work related stressors

- Deadlines.
- Overworked.
- Under challenged, leading to possible boredom.
- Change.
- Promotion prospects.
- Racial or sexist remarks.
- Personal relationships with superiors and other members of staff.
- Travelling.
- Job satisfaction.
- Harassment.
- Confrontation.
- Likes and dislikes.

Stress counselling can often have a stigma that it is only for the 'weak' or 'mentally ill'. However, the reverse is actually true.

It may be difficult to talk to the direct line Manager about the problem face to face, as it might be that this relationship is the cause, the company have a policy that all members of staff can approach a senior member of staff and raise any concerns relating to stress. All conversations will be addressed in the strictest confidence and a Manager will try and assist individuals suffering from stress to deal with the problem.

3.27 Training

The company is aware of the duties placed on employers with regard to the training of employees and are fully committed to training employees to the highest levels within the industry.

It is the responsibility of management within the company to identify any training needs and to ensure that these needs are fulfilled.

All aspects of health and safety training within the company will be reviewed on an annual basis.

Current training records are held in the company head office.

Training covered includes but is not limited to: -

- Manual Handling
- COSHH
- Supervisor Training
- First Aid

3.28 Violence at work

Violence is defined by the HSE as 'any incident in which a person is abused, threatened or assaulted in circumstances relating to their work'. Verbal abuse and threats are the most common type of incident. Physical attacks are comparatively rare.

Who is at risk?

Employees whose job requires them to deal with the public can be at risk from violence. Most at risk are those engaged in: -

- Giving a service
- Caring
- Education
- Cash transactions
- Delivery/collection
- Controlling
- Representing authority

It is possible that violence could occur in one or other of these categories within your organisation.

Is it my concern?

Both employer and employees have an interest in reducing violence at work. For employees, violence can lead to poor morale and a poor image for the organisation, making it difficult to recruit and keep staff. It can mean extra cost with absenteeism, higher insurance premiums and compensation payments. For employees, violence can cause pain (both physical and mental), distress and even disability or death.

Physical attacks are obviously dangerous, but serious or persistent verbal abuse or threats can also damage employees' health through anxiety or stress.

There are five main pieces of health and safety law that are relevant to violence at work.

These are: -

- **The Health and Safety at Work etc. Act 1974 (HSW Act)** – Employers have a legal duty under this Act to ensure, so far as is reasonably practicable, the health, safety and welfare at work of their employees.
- **The Management of Health and Safety at Work Regulations 1999** – Employers must assess the risks to employees and make arrangements for their health and safety by effective planning, organisation, control, and monitoring and review. The risks covered should, where appropriate, include the need to protect employees from exposure to reasonably foreseeable violence.
- **The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)**. – Employers must notify the enforcing authority in the event of any act of non-consensual physical violence done to a person at work.
- **Safety Representatives and Safety Committees Regulations 1977 and The Health and Safety (Consultation with Employees) Regulations 1996** – Employers must inform, and consult with, employees in good time on matters relating to their health and safety, which includes violent behaviour instances.

Effective Management of Violence: -**Stage 1 – Finding out if there is a problem.****Stage 2 – Deciding what action to take.****Stage 3 – Take action.****Stage 4 – Check what has been done.**

Stage 1: You may think violence is not a problem at your workplace or that incidents are rare. However, your employees' may be somewhat different.

Ask your staff: do this informally through Managers, Supervisors and safety representatives or use a short questionnaire to find out whether your employees ever feel threatened. Tell them the results of your survey so they realise that you recognise the problem.

Keep detailed records: it is a good idea to record incidents, including verbal abuse and threats. The following information should be recorded: an account of what happened, details of the victim(s), the assailant(s) and any witnesses. The outcome, including working time lost to both the individual(s) affected and to the organisation as a whole, and details of the location of the incident.

Some employees may be reluctant to report incidents of aggressive behaviour that make them feel threatened or worried.

3.29 Visits from enforcement officers

The Health and Safety at Work etc Act 1974 conveys certain powers on Inspectors who are appointed by the relevant enforcing body, in order that they ensure the relevant statutory requirements are being complied with.

The company recognises the need to co-operate with enforcement officers.

Once satisfactory documentation has been produced employees of the company will provide all necessary assistance and co-operation with the inspector whilst visiting company premises or a transient work location. For this reason, it is important that all required documentation be maintained and kept up-to-date. Such documentation will include this health and safety policy, relevant risk assessments and emergency plans etc.

Where necessary Seguro Management Ltd will help liaise with the enforcing authority on behalf of the company to ensure that health and safety issues and concerns are dealt with promptly and correctly.

3.30 Welfare

The company will ensure so far as is reasonably practicable the health, safety and welfare of their employees at work. The Workplace (Health, Safety and Welfare) Regulations expand on these duties.

The company will aim to comply with these regulations by: -

- Providing a reasonable temperature in all workplaces during opening hours that will be at least 16 degrees Celsius, unless the activities involve severe physical effort in which case the temperature will be at least 13 degrees Celsius.
- Ensuring suitable and sufficient lighting is provided, that is, so far as is reasonably practicable, natural lighting to enable people to work, use facilities and move around the workplace without experiencing eyestrain.
- Keeping the premises clean and tidy with all traffic routes cleaned at least once a week and any accumulation of dirt and refuse removed at least daily.
- Providing windows and doors that are made from safety material or protected against breakage. They shall also be appropriately marked to make them apparent.
- Providing adequate toilet facilities that are cleaned on a regular basis and have hot and cold running water, soap and towels or other suitable drying facility. In the case of water closets used by women, suitable means will be provided for disposal of sanitary dressings.
- Providing adequate wholesome drinking water that is readily accessible and appropriately marked.
- Providing somewhere that employees can store outdoor and personal clothing whilst at work. This facility should be clean and well ventilated to enable wet clothes to dry.

3.31 Work equipment and maintenance

The Provision and Use of Work Equipment Regulations (PUWER) emphasise the general duties that are written in the Health and Safety at Work etc Act. The regulations apply to all work equipment, including second-hand, hired, leased or privately owned equipment when used at work.

It is the company's policy to ensure that all equipment used complies with the regulations.

Wherever there is any significant risk to health and safety due to the work equipment the company will: -

- Undertake full risk assessments for the equipment that is being used and issue copies of the assessments to all operatives along with the people who may be adversely affected by the equipment.
- Ensure that employees are provided with sufficient information, training and supervision when using the equipment. All training will be documented on the employee's personnel file.
- Ensure that all necessary safety controls are in place such as guards, isolation switches etc.

Ensure that all work equipment is maintained and inspected as required by the manufacturer's instructions. Records of all inspections will be held on file for future information.

In order to comply with the regulations relating to maintenance the company will: -

- Ensure that all work equipment is maintained and kept in good working order and where necessary a written maintenance log kept up to date.
- Ensure that all work equipment is provided with a suitable means of isolation to ensure that the electricity or other sources of energy can be switched off when maintenance work is being undertaken.
- Ensure that when equipment is isolated it cannot be reconnected to the power supply if it will expose the maintenance engineer to risk to his/her health or safety.
- All persons who maintain, supervise or manage maintenance work are competent to do so.
- Provide comprehensive health and safety information relating to specific equipment and where necessary written information about the maintenance requirements for the machinery/equipment.

It is the company's aim so far as reasonably practicable, to take all practical steps to safeguard the health, safety and welfare of all employees who are required to maintain work equipment along with any other person who may be affected by the task.

The company, after consultation with relevant members of staff will: -

- Undertake suitable and sufficient risk assessments, identifying how equipment should be isolated prior to carrying out any maintenance work.
- Undertake suitable and sufficient risk assessments, identifying how heavy parts of machinery are required to be moved or when anyone is required to travel into any dangerous areas to undertake the task (e.g. Working on the roof of the premises etc).
- Undertake suitable and sufficient risk assessments, of all hazards presented if and when guards are removed from any machinery.
- Implement the appropriate measures for the protection of anyone undertaking maintenance operations when the assessment has indicated that the task involves significant risk to health or safety.
- Supply all necessary personal protective equipment that is required to be worn when the maintenance work is being undertaken.
- Ensure that all staff are fully aware of reporting procedures so that a responsible person can be informed of any problems or implement any necessary remedial action.

The company will provide relevant employees with all the necessary information, instruction and training as far as reasonably practicable to safeguard the health and safety of the maintenance engineers and any other members of staff who are required to undertake maintenance activities.

It is the responsibility of the line manager to ensure that suitably qualified persons undertake all maintenance activities and the tasks are adequately supervised.

3.32 Young persons at work

The Health and Safety Executive classify all people under the age of 18 years of age, as a young person including children under the age of 16. This definition applies to students, trainees and children on work experience and classify them as employees regardless of the number of hours worked or the period of employment.

Current legislation requires all employers to undertake risk assessments for all employees; this includes young workers who may be working on the company's premises. When the assessment has been completed the employer must implement suitable and sufficient control measures to ensure that the risks are controlled.

Young workers are particularly at risk of injury in the workplace due to their lack of awareness of potential hazards, immaturity and inexperience.

Children under the age of 13 years of age are prohibited from any form of employment, however children between 13 and the Minimum School Leaving Age (MSLA) can undertake work experience schemes approved by local education authorities. If the company offers placements to students, trainees or children they will be treated as employees and will be provided with the same health and safety protection as any other employee.

Before engaging any young employees the company will complete specific risk assessments, these will include: -

- The fitting out and layout of the workplace and the location of where the individual will work.
- The type of work equipment that will be used and how it is to be handled.
- How various work and processes being undertaken are organised.
- The extent of training that has been provided or that will need to be provided to the individual concerned.

Before any children are employed or they are offered work experience, the company will notify the parental guardians of the key findings of the risk assessments and the control measures that have been implemented to reduce the likelihood of an injury occurring.

All young people who start work with the company will receive suitable training in order that they can undertake the work task safely without putting themselves or others at risk. All training will be assessed on a regular basis to ensure that the key instructions have been understood. The company view this training as a bare minimum and will ensure that the individuals are fully supervised at all times to ensure that they are competent to carry out the task.

In addition to the normal health and safety records that are documented relating to work activities, the following information will be kept with regard to young persons.

- Specific risk assessment records for the tasks that young people within the company are required to undertake.
- Details of training and information that has been given to the young person along with records to show that the individuals have accomplished an acceptable standard of competence.
- Where the young person has not reached minimum school leaving age a record will be kept of any correspondence and information that is communicated to the parents/parental guardian