

HEALTH AND SAFETY ARRANGEMENTS

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The Health and Safety Management system provides a structured and systematic approach to the health and safety arrangements within its business activities.

The system itself is in three sections:

- This Health and Safety Policy document
- A Guidance & Procedures Folder
- Personnel handbook

Across these documents are our plans, arrangements, and management tools for effective implementation of our Health and Safety Policy.

This document is primarily for employees and stakeholders such as potential Clients to provide an overview of our arrangements and direction.



The Guidance & Procedure folder contains specific instructions and processes for management to carry out within guidelines to enable the company to meet regulatory compliance.

The employee handbook delivers practical arrangements and instruction in a digestible manner to workers in the production area and on the site.

All three documents are consulted on and involve the workers in their development from inception to implementation. This can be evidenced in the manner in which they are created as part of the wider management system.

This H&S management system is based on the HSE guidance HSE 65 'Managing for Health & Safety' which incorporates the Plan, Do, Check, Act Cycle which should, on further development, be able for amendment and enable accreditation to internationally recognised standards such as OHSAS 18001 or the new ISO 45001.

As well as providing an accredited management system to potential clients, this reduces areas of paperwork by avoiding duplication in supply chain systems, whilst giving confidence to stakeholders that we have adequate control over the risks we create through effective management

Roles and responsibilities

All employees

The company takes the health, safety & welfare of all employees and other who may be affected by our health and safety very seriously. We are in a continuing process of setting standards based on statutory requirements and these can be evidenced in policy, procedures and safe systems of work.

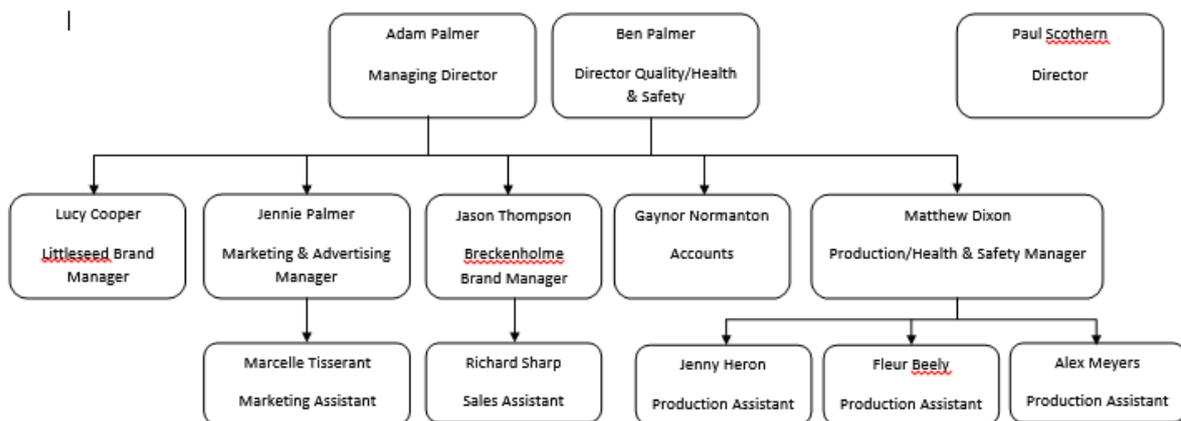
These standards will take input from all involved including commitment and demonstrable leadership from Directors and line management, leading by example and supervisors promoting the positive aspects of Health and Safety.

Importantly where methods of work described as working behaviour are to change for the better all staff will need to listen, understand and feedback on information, instruction & training provided by the company. This will make sure we are doing our best as employers.

Every level of the organisation has duties under the Health & Safety at Work Etc. Act 1974 Section 7 & Section 8 requiring employees to:

- 1. Take reasonable care of themselves and others that may be affected by what they do at work;**
- 2. Co-operate with their employer to enable them to carry out their duties;**

Organogram



STRUCTURE OF ORGANOGRAM

- MD
- Director of Quality
- Director
- Continuous Improvement Manager
- Production
- Health and Safety Manager
- Marketing & Advertising Manager
- Littleseed Brand Manager
- Production Operatives/Assistants
- Health and Safety Staff Representative
- Supervision
- Sales Assistant
- Site – Trade Stall/s
- All Workers: Production Technicians & Administration

Purpose of policy

1. BTC (the Employer) takes health and safety issues seriously and is committed to protecting the health and safety of its staff and all those affected by its business activities and attending its premises. This policy is intended to help the Employer achieve this by clarifying who is responsible for health and safety matters and what those responsibilities are.
2. This is a statement of policy only and does not form part of the contract of employment. This policy may be amended at any time by the Employer in its absolute discretion. The Employer will review this policy at regular intervals to ensure that it is achieving its aim effectively

Who is responsible for workplace health and safety?

3. Achieving a health and safe workplace is a collective task shared between the Employer and the staff. This policy and rules contained in it apply to all staff of the Employer, irrespective of seniority, tenure and working hours, including all employees, directors, consultants and contractors, casual or agency staff, trainees, homeworkers and fixed term staff. Specific responsibilities of staff are set out in the section headed "responsibilities of all staff"

Employer responsibilities

4. The Employer is responsible for;
 - a) taking the above steps to safeguard the health and safety of staff people affected by the Employers business activities and of people visiting the premises;
 - b) identifying health and safety risks and finding ways to manage or overcome them;
 - c) providing a safe and healthy workplace or place of work and safe entry and exit arrangements including during an emergency situation;
 - d) providing and maintaining safe working areas, equipment and systems and where necessary, appropriate protective clothing ;
 - e) providing safe arrangements for use, handling, storage and transport of articles and substances;
 - f) providing adequate information instruction training and supervision to enable all staff to do their work safely, to avoid hazards and to contribute positively to their own health and safety at work. The Employer will give staff the opportunity to ask questions and advise who best to contact in respect of any questions if employees are unsure about how to safely carry out work.
 - g) ensuring any health and safety representatives receive appropriate training to carry out their functions effectively;
 - h) providing a health and safety induction and appropriate safety training to the role, including:-
 - manual handling
 - control of substances hazardous to health (COSHH)
 - working at height
 - the use of personnel protective equipment
 - i) promoting effective communication and consultation between the Employer and staff concerning health and safety matters and consulting with staff directly on matters relating to health and safety;

- j) regular monitoring and reviewing of the management of health and safety at work making any necessary changes and bringing those to the attention of the staff.
5. The board of directors of the Employer has overall responsibility for health and safety and has appointed Mathew Dixon as the Health & Safety Officer with day to day responsibility for health and safety matters.
 6. Any concerns about health and safety matters notify the Health & Safety Officer

Responsibilities of all Staff

General staff responsibilities

7. All staff must:
 - a) Take reasonable care for their own health and safety and that of others who may be affected by their acts or omissions.
 - b) Co-operate with the Health & Safety Officer and the Employer generally to enable compliance with the health and safety duties and requirements.
 - c) Comply with any health and safety instructions and rules, including instructions on the safe use of equipment.
 - d) Keep health and safety issues in the front of their minds and take personal responsibility for the health and safety implications of their own acts and omissions.
 - e) Keep the work place tidy and hazard free.
 - f) Report all health and safety concerns to the Health & Safety Officer promptly, including any potential risk, hazard or malfunction of equipment, however minor or trivial it may seem; and
 - g) Co-operate in the Employer's investigation of any incident or accident which either has led to injury or which could have led to injury, in the Employer's opinion.

Staff Responsibilities relating to equipment

8. All Staff must
 - a) Use equipment as directed by any instructions given by representative of management or contained in any written operating manual or instructions for use and any relevant training.
 - b) Report any fault with, damage to or concern about any equipment (including health and safety equipment) or its use to the Health & Safety Officer, who is responsible for maintenance and safety of equipment;
 - c) Ensure that health and safety equipment is not interfered with; and
 - d) Not attempt to repair equipment unless suitably trained and authorised.

Staff responsibilities relating to accidents and first aid

9. All Staff

- a) Promptly report any accident at work involving personal injury, however trivial, to the Health & Safety Officer so that details can be recorded in the Accident Book and co-operate in any associated investigation;
- b) Familiarise themselves with the details of first aid facilities and trained first aider, which are displayed on the notice in the Changing Room;
- c) If an accident occurs call for one of the first aiders, giving the name, location and brief description of the problem;
- d) The Health & Safety Officer is responsible for the investigating any injuries or work-related disease, preparing and keeping accident records, and for submitting reports under the Reporting of Injuries, Diseases and Dangerous Occurrence Regulations 2013 (RIDDOR), where required.

Staff responsibilities relating to national health alerts

10. If an epidemic or pandemic alert is issued all staff must comply and co-operate with all instructions, arrangements and advice issued by the Employer. Steps are to be taken by staff to minimise the risk of any infection. Any questions should be referred to the Health & Safety Officer

Staff responsibilities relating to emergency evacuation and fire

11. All staff must

- a) Familiarise themselves with the instructions about what to do if there is a fire which are displayed on the wall IWO the forklift charging point;
- b) Ensure they are aware of the location of fire extinguishers, fire exits and alternative ways of leaving the building in an emergency;
- c) Comply with the instructions of fire warden if there is a fire, suspected fire or fire alarm (or a practice drill for any of these scenarios);
- d) Co-operate in fire drills and take them seriously (ensuring that any visitors to the building do the same), fire drills will be held at least once every 6 months;
- e) Ensure that fire exits of fire notices or emergency exit signs are not obstructed or hidden at any time;
- f) Notify the Health & Safety Officer immediately of any circumstances (for example, impaired mobility) which might hinder or delay any evacuation in a fire. This will allow the Health & Safety Officer to discuss a personal evacuation plan for you, which will be shared with the colleagues working near to you

12. On discovering a fire, all staff must:

- a) Immediately sound the fire alarm and if time permits call the Production manager and notify the location of the fire; and

- b) Attempt to tackle the fire **ONLY** if they have been trained and are competent to do so. Nominated members of staff will be trained in the use of fire extinguishers.
13. On hearing the fire alarm, all staff must:
- a) Remain calm and immediately evacuate the building, walking quickly without running, following the instructions of the fire wardens;
 - b) Leave without stopping to collect personal belongings;
 - c) Remain out of the building until notified by a fire warden that it is safe to re-enter.

Health & Safety Director is responsible for ensuring the fire risk assessment is conducted and changes made where required. The Director is also responsible for making sure there are regular checks of fire extinguishers, fire alarm bells, escape routes, signage and emergency lighting are carried out.

Non-compliance with health and safety rules

14. Any breach of health and safety rules or failure to comply with this policy will be taken very seriously and is likely to result in disciplinary action against the offender, in accordance with the Employers disciplinary policy, up to and including immediate dismissal.

Every level of the organisation has duties under the Health & Safety at Work Etc. Act 1974 SECTION 7 & SECTION 8 requires employees to:

- 1. Take reasonable care of themselves and others that may be affected by what they do at work;**
- 2. Co-operate with their employer to enable them to carry out their duties;**
- 3. Not to intentionally or recklessly interfere with or misuse anything provided for in the interests of health and safety.**

See the site Rules section of the policy for legal duties. It is vital all employees read and understand in order to avoid committing any breach for both yourself and the company.

As part of our legal duties we will monitor work activities to give confidence that we are complying with duties to supervise. Non-conformance or deviation will always be discussed in a positive manner. However, all employees are subject to the same criteria and disciplinary procedure for any deviations from this policy.

Examples of the 3 duties on all employees include:

- Attending training courses for health and safety and implementing this into the work for example using Mobile Elevated Work Platforms correctly.
- Wearing PPE that is suitable and sufficient for the task
- Raising concerns with anything provided for health and safety such as training, equipment or materials where defects, inconsistencies or faults occur.

- Ensuring work does not commence without risk assessment/s & sufficient documentation in place

Directors

Managing Director (MD):

- Ensuring the management of Health and Safety is effective through the appointment of a Health and Safety Director their aims is reducing accidents and ill-health through the implementation of the management system – starting with an internal Statement of Intent for policy.
- Leading from the front and demonstrating commitment by communicating the importance of Safety particularly to other Directors and Senior Management for the communication ‘cascade’.
- Ensuring key statutory duties are carried out whilst acknowledging H&S duties may be discharged to others where competence is confirmed, but responsibility & accountability cannot be discharged, including, but not limited to, for example:
 - Fire Risk Assessments are carried out
 - Ensuring testing and examinations for equipment are carried out
 - Ensuring Activity risk assessments are carried out
 - Ensuring training relevant to activities and roles is procured
 - Ensuring monitoring of systems and arrangements takes place and adjusted as necessary

Ensuring systems are in place to recognise positive contribution and behaviour, as well as an effective and fair disciplinary procedure for poor performance.

- Taking part in ‘Director’s Tours’ as part of the monitoring procedures for the premises and workplaces.
- Attending suitable and sufficient training for health and safety, reading, understanding and feeding back on internal communications including such as ‘Director’s Briefing’ information.
- Ensuring the Procurement process integrates safety through systems and procedures to the selection of equipment, substances and services consider H&S in an appropriate manner.
- Commission or carry out reports for health and safety including summaries of monitoring, accident & incident data, training records, enforcement authority communications amongst others and provide input and ensure resources to take the necessary course of action
- To attend, and chair as far as possible the H&S consultation meetings and ensure the consultation arrangements agreed on are communicated and implemented.

Line management

All managers have similar overall duties in the way they plan, instruct, procure products and services in that they must ensure they do so with adequate regard to the health and safety of all whom may be affected. General duties also include:

- Understanding and implementing the companies H&S policy and implementing it
- Ensuring no works under your control start without having the risks assessed and appropriate levels of control measures applied including monitoring & review
- Liaising and consulting with workers under your control as per consultation and information systems sections of policy – Never instruct a worker to carry out something untrained
- Ensuring substances, equipment and services procured are suitably selected with appropriate consideration for H&S risks such as whether CE marking or MSDS are checked and logged.

- Identifying training requirements for those under your control and ensuring you liaise with budget holders to arrange this training in co-ordination with the Health and Safety Director.
- Ensuring that safe workplaces are maintained by control measures identified, including supervision levels and inspections etc. are effective and remedying any failures, including human error. Specific attention is drawn to housekeeping and safe systems of work.
- Promoting H&S in a positive manner by encouraging the inclusion of workers in safe systems of work and recognising efforts for positive behaviour as well as disciplinary action for poor practise and behaviour.

Ensure you receive, read, understand and question where necessary, any information and training documentation provided by the H&S management system.

- Challenging dangerous behaviour as and when you see it, and reporting all accidents, incidents and near misses as applicable throughout your line management responsibility

- Leading by example such as wearing PPE where required, attending relevant training courses, being involved in monitoring activities, encouraging those under your control to improve safety related behaviour where required.
Ensuring all plant and equipment under your control is inspected and examined in line with statutory requirements. Never order works with out of date certificates i.e. Lifting Operations and Lifting Equipment Regulations 2005 (LOLER)
- Taking part in routine monitoring of areas under your control including inspections & audits

H&S Officer

The Health and Safety manager has a lead role in implementing Health and Safety management system. They must liaise and co-ordinate with the experts, professionals and workers who are actively involved in carrying out the company's undertakings on a daily basis and evaluating the level of compliance and risk associated.



Specifically, the H&S Manager is responsible for:

Providing health and safety advice to Managers and Directors. Providing them with information regarding duties, requirements, compliance, policy and procedures.

Creating, implementing, monitoring and maintaining a H&S management system

Attending operational sites to carry out monitoring activities

Attend suitable and sufficient training courses specific to company requirements. To carry out a skills gaps analysis, a fill the gaps as far as is reasonably practicable. There is a further requirement to identify training or knowledge limits, in a bid to minimise risk from competency gaps within the workforce.

To identify training needs of the organisation relevant to post-holders (in consultation with workers).

Lead by example by wearing PPE where required and challenging dangerous behaviour, suggesting improvements where possible

Report accidents, incidents and ill-health prevalence and record data along with other monitoring data identified by policy and risk profile to Directors and facilitate an annual review.

Being a point of contact for the HSE or other enforcing authorities as appropriate

Attending, contributing and providing H&S input into consultation and worker involvement arrangements such as H&S committee meetings, safety briefings etc.

Creating internal training documentation and tools for implementing the Health and Safety management system, such as risk assessment forms.

Carry out audits and determine the level of compliance and provide meaningful evaluation for the findings

Create, implement and maintain Review procedures for Directors and assist in setting an action plan for the following period H&S performance targets in policy.

Ensure those working under your direction are doing so in a safe and healthy manner

Supervision/Production Manager

Supervisors have sufficient operational experience to realise what actions are required to get a job done correctly this includes health and safety. The line-management function of supervisors is not underestimated and valued at the company. They provide the monitoring activities and encouragement for good safety behavioural performance this is required to motivate workers.

Supervisors have specific safety duties including:

Leading by example to workers under their control and promoting the value of safety, good behaviour is recognised as well as poor performance and addressed appropriately



Carrying out pre-start brief and tool box talks as part of the delivery of Risk Assessment and Method Statements (RA/MS) and Safe System of Work (SSW). Duties also include gaining understanding from workers. Reporting any accidents and incidents, near misses or dangerous occurrences in the workplace immediately or as soon as possible where immediately cannot be achieved.

Ensuring contribution to the risk assessment process and identify any failings in control measures including equipment selection, material usage, training needs, environmental concerns.

Communicating risk assessment findings to those under their control & not allowing methods of work or equipment and substances to change without authorisation from the safety officer.

Taking part in consultation arrangements for adequate worker involvement and contributing to the health and safety management system. Encouraging workers under their control to contribute to suggestions, improvements and hazard identification.

Carry out monitoring activities such as identifying equipment requiring lifting equipment (LOLER) or other such examinations such as Portable Appliance testing (P.A.T testing). Carrying out monitoring of the workplace activities using company pro-forma within RAMS/ SSW and ensuring work is carried out as per risk assessment and safe system of work is also imperative.

Maintaining provision for health and safety, requesting such as portable firefighting and first aid arrangements & equipment in vehicles under their control

Reporting flaws, defects, deficiencies in equipment, training for health and safety as is relevant to the business.

Ensuring your workplace is tidy and free from hazards during and at the end of every shift

Ensuring workers you supervise have been trained or prohibited from tasks until such a time.

Workers & other Operatives (Contractors):

In conjunction with all employees (above) the following general H&S responsibilities are placed on all employees:

Do not start work until you have received an induction for the site you are currently working on (this does not have to be repeated unless significant changes have occurred affecting the risks present).

Always carry out only tasks you have received information, instruction and training on – NEVER CARRY OUT SOMETHING YOU ARE NOT TRAINED OR COMFORTABLE WITH

Never bring new tools, equipment, materials or substances on to site without authorisation from line management or supervision (confirmation maybe required from the H&S manager).

Make sure you have read, understood and challenged risk assessment findings. You are required to understand and agree with the content before you start work.

Follow all safety control measures listed in the method statement & feedback on the suitability.



Always wear PPE listed in the control measures and remember – PPE is the last line of defence, always makes sure other controls are in place before relying on PPE.

Never operate plant and machinery such as Mobile Elevated Work Platforms (MEWPS), Fork Lift Trucks and Reach Trucks unless you have the specific category license i.e. 'cherry picker' or 360° Merlo, and authorisation.

Familiarise yourself with the company's Site Rules and adhere to them

Contribute to worker involvement initiatives and consultation arrangements to improve the health and safety management system. Report any accidents, incidents, near-misses, ill-health or dangerous occurrences to a supervisor.

Contractors:

Ensure you do not start work without specific site induction to premises under our control

Maintain your own work area in a tidy manner to reduce risks to yourself and others. You must remain within areas agreed for your scope of work – consider your risk assessment & method statement details including any relevant Permit to Work criteria and restrictions.

Do not start works without approval of your contractor documentation including your risk assessment and method statements

Follow all reasonable instruction and emergency procedures listed in induction training including no smoking, parking, waste disposal and other work safe procedures

Report all accidents to the company however small you may think it is. You remain responsible for any regulatory reports such as those under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (as amended).

Only carry out agreed, contracted works which you are trained and authorised to do. Stop all works if 3rd party risks including company staff are encountered in your work area and report to the company site management.

Health and Safety Officer

Lead by example and always wear PPE in areas requiring its use;

Stop any activity being carried out that presents immediate danger to people; and report such incidents.

Assist in the creation of risk assessments and method statements for which you have experience in the activities – Identify limitations in your skills, knowledge and experience where the risk assessment may not be suitable and sufficient and report as such to the Health and Safety Manager/Director

Assist in the identification, creation, implementation, monitoring and maintenance of procedures as directed by the H&S Manager, in cooperation with other relevant persons.



Undertake any reasonable requests from line management in the fulfilling of general H&S duties to help the employer comply with legal duties imposed under statute.

Co-ordinate with managers and supervisors to ensure all testing and examinations are carried out in a timely manner reducing risks to users and others who may be affected.

Attend training courses and seminars as and when required that the company undertakings would benefit from to improve your skills set.

Participate in, suggest improvements for, and identify defects or flaws in the H&S management system and communications systems.

Carry out monitoring activities of the workplace and sites to ensure the management systems control measures are effective and efficient in their implementation.

Assist in the identification of training needs and report to the H&S Manager where opportunities for improvement or omissions have been found.

Organise the repairs of plant and equipment for use in operations including tools such as grinders, magnetic drills and other equipment covered under Provision of the use of work Equipment Regulations (PUWER).

Carry out or assist in accident investigations and drawing up reports on those he is charged with investigating.

Carry out tool box talks and safety briefings to workers, supervision, management and Directors as

Specialist Advice / service provision including training:

Specialist advisors are not under the direct control of the company

However, the company has a process involving their cooperation in helping us provide value to our management team in the data, service & information they supply. The company requires specialists to:

Meet with managers or representatives of the company. As far as possible to discuss and ensure our needs can be met and identify any professional limitations such as skills and experience where relevant.

Assist managers identify exactly what they require in terms of service provision where they cannot competently identify as such themselves.

Discuss and liaise with managers or those placing orders to ensure information and data received are in a format that is understandable to persons not expert in this area i.e. reports for noise or vibration surveys to ensure the company meets its legal obligations

Design, create and give guidance on the implementation of an action plan which must be supplied where gaps in compliance exist, in the area for which the expert's service was procured.



Safety Representatives

To familiarise themselves with this policy, their responsibilities as employees as well as Representatives of Employee Safety (RES) under the H&S(CE)R 1996.

To represent the workforce on matters of:

Potential hazards and dangerous occurrences in the workplace which could affect his represented employees. (More immediate risks)

General health and safety matters (those listed 2 bullet points lower – less immediate)

Being a point of contact in consultation for the workers he represents.

To represent the workforce on matters of safety to the management team of the company It is important to remain objective in reaching health and safety goals for performance.

To receive and cascade information to the groups of employees he represents from the employer including:

The introduction of measures that may substantially affect the health and safety of employees (risks and controls from activities)

The arrangements for appointing competent health and safety advice (found in this policy)

Other health and safety information required by other legislation such as emergency procedures

Planning and organising suitable and sufficient, information instruction, training and supervision for the workforce.

Health and Safety consequences from the introduction of new technologies (Risk assessment findings on new technologies for our activities)

To consult all workers, they represent in a timely manner on issues raised at the H&S meeting and feedback actions and discussion points. This will include coordination with site-supervision and designers.

To attend training courses, formal and in-house, read information and other publications by industry and HSE bodies to improve understanding of health and safety matters.

To utilise facilities in co-ordination with office users to carry out your functions as necessary.

Update the 'Health and Safety Notice' board as part of ongoing communication & consultation arrangements.

c) Responsible Person under the Regulatory Reform Fire Safety Order (RRFSO) Fire Warden (Including Senior Fire Warden)

Fire safety risk is of such a magnitude, with such rapid losses at devastating speeds, that it is always a potential high severity, even with extremely low frequency due to the potential for loss of many lives, damage to premises and the environment in very short periods of time.

The company has a specific policy and procedure where the general duties below can be expanded on. A designated responsible person (RP) will ensure the Regulatory Reform Fire Safety Order (RRFSO) 2005 is implemented. A Fire Risk Assessment (FRA) is carried out and that General Fire Precautions (GFP) are adequate, and Process Fire Precautions (PFP) are in place.

Fire Warden:

To carry out periodic fire warden inspections of the workplace under their control

To Check emergency escape doors are closed, unlocked and unobstructed

To check exit signs, fire action notices and other notices in place

Combustible materials and sources of ignition not presenting a hazard in the workplace

Plug sockets not overloaded or other electrical hazards in the workplace

No uncontrolled ignition sources including smoking in workplace; among others

To report any defects in fire safety arrangements and report them to the senior fire warden or H&S management team as applicable.

To maintain attendance lists (fire registers) in the event of an emergency or practice drill and report to the senior fire warden for further communication to the Fire & Rescue Service needed.

d) First Aiders

To attend training & refresher training as required in line with First Aider requirements and company policy

To deliver first aid in line with training received when called upon / alarm raised, when safe to do so and within the scope of training received.

To report all accidents in cooperation with the injured, where feasible, the area / line-management (such as supervision if not yourself) to Health and Safety management.

- To understand the accident, incident and first aid provision arrangements detailed in procedures which supplement this policy
- Monitoring first aid stocks within their area of control and reporting on usage to maintain suitable levels.
- Informing line-management of any planned absence, or reporting sickness absence in line with company policy to ensure relevant first aid levels can be anticipated and planned for as far as possible.

Competent persons Appointed Person (Lifting)

- To carry out an initial survey as part of the lifting plan development to identify hazards during the lifts, over-head and similar underground or other environmental hazards
- Being aware of changing conditions from transient workforces and inclement weather conditions which increase risk during lifts outside.

- Appropriately select lifting equipment and accessories including lifting gear and sizing cranes. This must all be done prior to the project start to enable safe planning of the lift and documentation being prepared.
 - To write up a suitably developed lift plan including the provision of a suitably trained lift supervisor in the event of the appointed person being unavailable to attend site for the lift.
 - To dynamically re-assess and state a safe method of work where changing conditions or the original plan did not make it to eventual implementation.
 - Carry out Portable Appliance Testing in line with training given and company policy per item or equipment in question
 - Attend training and refresher training on such as Fork Lift Truck and other plant and equipment use, fire safety arrangements as detailed in specific roles and responsibilities and other training as necessary to fulfil the role.
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- Maintain a tidy production area and yard so far as is within his control. Generally maintaining laydown areas, advising others where house-keeping is not being maintained, and directing deliveries in a safe manner in line with company policy.
 - Organising waste removal; including hazardous wastes and forwarding waste transfer notes to admin staff.
 - Ensuring refuelling operations are carried out safely in line with safety arrangements.

General

Resources and the Allocation of finance for Health and Safety

This is the companies first year of implementing a structured recognised management model, the company will establish a budget for H&S based on the last years accounts where resource for Health and Safety has been required. As part of the annual review of the effectiveness of control measures, both procedural and operational, and in considering the action plan created as part of the monitoring arrangements, the senior management board will prepare a budget for consideration.

(Return to and consider policy procedure development with relevant departments)

Planning

Health and Safety Management System outlines 'Planning' as:

Controlling risks

Reacting to changing production demands,

First Aid and other relevant emergency procedures; and promoting positive attitudes towards health and safety

Our planning aims to meet minimum legal requirements whilst involving workers at every stage of the process through our consultation procedures. Our planning will establish where we are on a periodic basis through our monitoring activities such as reviews and identifying KPI's with other



organisations for benchmarking. This will result in an annual action plan being produced from which to contribute to the review process and setting of new policy and objectives.

Organising

Within this policy is an organisational chart and details of responsibilities at each level of the company. 'Organising' for health and safety still largely incorporates the 4 C's as below:

Control – Line management and contractor control See

Co-operation – worker involvement, co-ordination with contractors, emergency service liaison and emergency procedures.

Communication – Distributing key information vertically and horizontally across the organisation

Competence – Ensuring skills, knowledge & experience are embedded throughout the company – See below

Organising also requires acknowledgement where specialist help is needed. This requires the key pillar of knowing where competence reaches its limitation within an individual's remit. This may include occupational health and specialist risk areas.

Construction (Design & management) Regulations 2015

As part of our undertakings, the company understands that we must comply with any notifiable construction work on site as set out in the Construction (Design & Management) Regulations 2015. We are aware we may have duties under defined duty holder positions of the Client. This is where work is carried out on our premises for us.

We acknowledge that a competent CDM Advisor will need to be appointed to help us discharge our duties.

Control of hazards: General (Risk Assessments and Risk Register)

The Management of Health and Safety at Work Regulations 1999 (MHSWR) Regulation 3 places duties on employers to assess risks to employees and others prior to carrying out their undertakings. The company has put in place procedures to identify hazards and associated risks in order to reduce them to as low a level as reasonably practicable.

In addition, to meet the requirements of HSG 65 we will profile risks and maintain a risk register to manage the risks appropriately.

The assessment process will follow the 5 steps approach in:

1. Identifying the hazards
2. Identifying who will be harmed and how
3. Evaluating controls and deciding if further precautions are needed
4. Recording the significant findings of the assessment

5. Reviewing the assessment periodically and on qualifying criteria, generally bringing into question the validity of the assessment.

The responsibility for assessing risks is laid out in the procedure and organising section above. The assessment will identify risk control systems which will cumulatively define Safe Systems of Work (SSOW). SSOW consider how People, Equipment, Materials and the Environment (PEME) interact safely to control hazards and mitigate risks.

Employees are made aware of their responsibility to adhere to information, instruction, and training given in relation to risk controls.

Consultation with Employees/Workforce

This policy and procedures derived from it have been designed to include consultation and worker participation at every stage of development and implementation. They meet the requirements of HSG 65 in a structured way.

Procedures follow the structure of:

Introduction & Compliance: The procedure and its requirements

Leadership: How leadership should be demonstrated throughout this procedure

Management: What management should ensure takes place to effect the procedures

Worker involvement: How workers were involved in designing the process; and

Competence: What skills, knowledge and experiences may be required to implement the procedures. Process: A simple process flow chart, marked up where necessary.

(Audit) Consultation will take place in a variety of ways. The workers will be represented by a Representatives of Employee Safety elected by themselves (workers) in formal meeting run every 2 – 3 months maximum. An agenda can be found in the procedures section of the Health & Safety management System along with meeting attendees, and terms of reference where relevant. In accordance with Health and Safety (Consultation with Employees) Regulations employees will be consulted on:

Measures affecting Health and Safety;

Appointment of competent persons;

Information on risks and controls they face;

The planning and organisation of training; and

Any consequences of new technologies introduced to the workplace

Methods of consultation will be both formal and informal to integrate worker involvement and promote a positive culture through 2 way communication as far as possible. Further details can found in the Consultation Arrangements procedure.



Communication (Including Company Site Rules)

Effective communication is a good indicator of Health and Safety Culture and can be used for measurement. We aim to provide:

Clear and concise written materials such as a Policy, safety bulletins, posters and guidance

Briefings, tool box talks, consultation proposals and formal & informal meetings

Embed mechanisms from listening to workers and feedback

The company will aim to involve workers in policy and procedural development at all stages of the process, from creation to implementation and monitoring & review. The policy will also be available on notice boards, the intranet, and delivered in consultation and communication arrangements over a 2 year cycle with monitoring arrangements to check the effectiveness of its communication.

Policy will be communicated to all new workers via induction, and periodically refresher trained on relevant parts.

Revisions of policy, procedures and arrangements will be brought to the attention of all employees by way of standing agenda at health and safety meetings and following the consultation process listed above.

The Site Rules

There are strict site rules that apply to all onsite these include rules for food safety and hygiene. These rules must be followed at all times and clearly displayed on site (see document Personal Hygiene and Factory Rules 2.DR version 6)

All Employees in Roles and Responsibilities

Competence (Skills, Knowledge, Training, Experience) of workforce including procurement of services and products.

The provision of information, instruction training and supervision (IITS) is a statutory duty under section 2 of the Health & Safety at Work Etc. Act 1974, furthermore it is core to successful health and safety management and a positive indicator of a culture and climate within an organisation, the company recognises and embraces that as part of core business function.

Employees receive training appropriate to their organisational level starting with induction training which covers as a minimum:

The companies Health and Safety Policy statement and management commitment.

Emergency Procedures;

Fire

First Aid

Risk Specific such as Work at Height, and COSHH for example



Welfare arrangements

Consultation and worker involvement arrangements

Accident, incident, near miss and safety concern reporting.

Health and Safety Rules

Specific training relevant to employment role will be given which will consider the health and safety risks and controls in place as far as reasonably practicable, this will include those with procurement of service and equipment as their decisions may have significant environmental health impacts.

A training matrix which incorporate health and safety needs analysis will be created from which individual learning plans can be derived. Training may be internal or external across a range of media such as classroom, e-learning, face to face, written instruction and many others.

Training records will be kept in personnel files and health and safety management files as far as possible. To meet certain subscriptions the company applies to, non-operational workers will be required to keep an up to date CV listing their Skills, Knowledge, Training and Experience as The company realises this is fundamental to personal development and the spirit of trust within worker involvement. Please reference matrix for details on training procedures.

Drug & Alcohol (D&A)

In implementing a health and safety management system the company must identify all foreseeable risks. These include the abuse of drug and alcohol and its possible effects to others including prescription medicines. We have a strict zero tolerance policy on the use of substances at work, and this extends to a duty to assess your own suitability to attend work after consumption for example the night before.

Drinking or drug problems will be treated as health issues and should be reported, in confidence to the Safety Director. Failure to do so, and subsequent incident or suspected influence at work, may result in disciplinary procedures being followed. We reserve the right to test for drugs and alcohol at random.

Accident, ill-health, incident, near misses reporting and First aid provision.

There are legal requirements to record accidents in the workplace, furthermore, there are implied duties to investigate in order to meet expressed duties to prevent recurrence of accidents within the MHSWR 1999. A detailed process and procedure for accident reporting and investigation is available.

The Reporting of Injuries Diseases and Dangerous Occurrences Regulations (RIDDOR) requires notification of certain accidents, industrial diseases and cases of ill-health as well as certain incidents specified therein. The company will meet these duties with a reporting process which ensures competent advice on incidents requiring their being reported to the HSE.



Accident reporting is included in induction training and operatives and line management have communication channels to ensure all incidents are recorded and reported if necessary to enforcing authorities as relevant.

Your line manager / supervisor will be made known to you and the methods of communication within the company for health and safety issues.

The Health and Safety Director will maintain records and data of accidents, incidents and ill-health for the relevant statutory requirement and for the purpose of subscriptions, particularly the last 3 years.

Hazard reporting

Many statutory instruments place duties on employees to report hazardous situations and defects in physical controls or training arrangements where a risk is presented. The company recognises it is also a good practise to encourage worker involvement and empower them to identify hazards that may otherwise have gone unnoticed or developed over time.

Hazard reporting benefits the organisation by:

Assisting with monitoring the effectiveness of our risk assessment and control procedures

Encourage employees to become stakeholders in the risk assessment process and take ownership of matters

Demonstrating the proactive approach to risk management wherever reasonably practicable elimination of risk before reduction and management of residual risks. The procedure details the hazard reporting requirements and forms to be completed by employees, contractors, supervision and management, and the subsequent process to closing the risks out thereafter.

Monitoring

HSG 65 has been adopted by the company as a recognised Health and Safety Management System. It is based on the Plan, Do, Check, Act cycle, at which C- Checking requires lagging and leading indicators to be monitored. These are also known as Pro-active and Re-active monitoring. In section 'Accident, ill-health and other reporting including near misses', lagging (re-active) indicators are discussed and procedures referenced.

Leading indicators are what we actively monitor before a loss event the company has a diverse range of activities and risks. The procedure document details how we monitor our activities both in-house and across Client premises. In summary the business does carry out:

- Director's Site inspection
- Safety Tours
- Health and Safety management inspections
- Line management inspections
- Safety Climate Surveys
- Internal audits



External Audits

Annual reviews

Benchmarking activities

To support this the company this policy states clearly and mandates behaviour, that should workers not feel safe in what they are doing, that they stop the activity ensuring no hazards remain from doing so and contact either their line manager / supervisor for further advice.

There will be no reprisal or losses suffered by employees with genuine concerns over safety issues. An investigation will be carried out at a level appropriate to the risk and the root cause determined. Where a training failure or other systemic failure has been identified the employee will be retrained or similar as necessary and monitoring procedures reviewed as required.

Hazard Specific

Contractors (including consultants)

The company understands that shortly contractors may be required for work both on our premises, and we take on the role of the client in the construction works. Both of these meet the requirements of the Construction (Design & Management) Regulations (CDM) 2015.

In summary contractors will be selected using procurement assessment criteria stipulated in the preceding CDM 2007 regulations, which has been incorporated into Publicly Available Standard (PAS) 91. This may be through preselected SSIP membership schemes such as 'construction line', 'CHAS' or similar or manual scrutiny by the Health and Safety Director.

Contractors will be asked to produce relevant documentation including monitoring arrangements for their undertakings. Joint monitoring activities will be agreed prior to commencement and maintained throughout the construction.

Electricity at Work

Electricity poses significant risk to employee health and safety including fibrillation, tissue burns and secondary injuries resulting from concussion or falls as a result from electrocution. The company will have fixed installations checked every 5 years as minimum, and on alterations, and portable appliances tested and inspected as per risk assessment findings. Live work is prohibited and a Permit to Work system is operated, all electrical work is carried out by competent electricians.

Overhead Power Lines (OHPL) and underground services may present a risk in certain undertakings. The above mentioned procedure caters for details where these rare risks are encountered. There will be suitable and sufficient measures in place as part of the assessment process in line with HSE Guidance documents GS6 'Avoiding danger from overhead powerlines' and AIS8 'working safely near overhead powerlines'.

Fire RRFSO (Regulatory Reform Fire Safety Order 2005)

Fire, unlike many other potential hazards, has a vastly increased risk to cause harm and loss many numbers of people in a very short space of time. The company acknowledges its duties under the Regulatory Reform (Fire Safety) Order 2005, and has in place a dedicated policy and procedures to



manage risks from fires which includes a Fire management log book for the premises based on the findings of a Fire Risk Assessment (FRA). Please reference Fire Safety Policy and Procedure for detailed arrangements including Emergency Evacuation Procedures, passive and active prevention and protection.

A suitable and sufficient Fire Risk Assessment will be undertaken for the business in line with the legislation.

First Aid

In order to meet the requirements of the Health & Safety (1st Aid) Regulations, the company will carry out an assessment and put in place measures to manage the risks concerned with trained personnel and sufficient medical supplies for our premises and mobile undertakings.

We will as a minimum ensure that appointed persons are nominated and trained, and that minimum provision of first aid boxes are supplied and monitored by designated persons, named in policy and procedures. See also above 'General' arrangements section 'Accidents and incident reporting including near misses'.

Maintenance

The management of H&S systems includes consideration of both hard and soft systems (physical & organisational). The maintenance of physical controls is closely linked with work equipment and risk assessment arrangements detailed above. The maintenance of organisational arrangements will primarily concern the implementation and review of policy, procedures and arrangements including management tools for assessment and control of risks. Please refer to monitoring section which aligns our management system to HSG 65's 'Check' section.

Manual handling

Manual Handling Operations (MHO) are any activity involving lifting, carrying, pushing, pulling etc. of loads by use of bodily force. Most occupational absence and ill health once was through injuries such as a 'bad back' as result of MHO's.

Thus, the MHO regulations have placed duties on employers to assess and manage risks starting with elimination as far as reasonably practicable through provision of mechanical handling aides. The hierarchy of control will be followed accordingly to manage the risks with effective control measures. The MHO Procedure details the specific manual handling risk assessment as well as training arrangements, which will include all employees exposed to risks from manual handling. Responsibilities are detailed in the organisation section of this policy and the MHO procedure.

Stress

Work related stress is a major source of workplace ill-health and absence costing companies millions of pounds each year in the UK. The company understands its duties under Section 2 of Health and Safety at Work Act 1974 and the development of precedent cases in stress risks. As such policy procedure details further our arrangements for assessing the risks from workplace stress and



implementing necessary controls outlined in the HSE's stress management standards which include organisational support, external access to competent professional services and employee co-operation in detailing information required for the assessment process.

Noise

The Control of Noise at Work Regulations 2005 require employers to carry out assessments where risk of exposure to harmful levels of noise exists. Being a food manufacture organisation the company regularly undertakes activities within the plant which create noise emissions.

Additionally, the machinery we house to carry out our undertakings includes conveyors, rapeseed oil press. This equipment produces multiple sources of exposure to noise, which must be reduced as far as is reasonably practicable.

To meet our duties as employers we provide information, instruction and training based on significant findings of the risk assessment carried out which ensure the development of a safe system of work.

The company provides personal hearing protection by issuing hearing plugs. There are communal distribution points for ear plugs within the changing area and as part of our monitoring, we carry out supervisory inspections of the workplace, conduct audiometric testing on a periodic basis and conduct health surveillance as part of the process.

Personal Protective Equipment (PPE)

The provision of PPE is acknowledged by the company and its senior management as being of high importance in the hierarchy of control in terms of risk management and food hygiene. In identifying control measures as part of risk control systems, PPE relies on human behaviour significantly, as well as quality and technical features for ensuring the wearer's safety.

With this in mind, the requirements of the 'Personal Protective Equipment at Work' Regulations 1992 (PPER) will be complied with but only with utmost adherence to remembering it is part of combined risk management with such as collective controls i.e. barriers as well as preventive controls such as training and instruction being provided.

PPE will be based on risk assessment findings specific to tasks and provision will be made via stores in the office premises, plant production area and individual vans. Replenishing stock will be recorded for and documentary evidences kept.

Hazardous Substances

Hazardous substances come in a variety of forms including chemical, biological, asthmagens, carcinogens, mutagens and other forms. The Control of Substances Hazardous to Health Regulations place duties on employers to manage risks from solids, liquids and gases in all their sub-forms.

To meet these duties the company will create a procedure and policy prohibiting the introduction of substances into the workplace without first having being assessed; develop an assessment proforma which requires consideration of all health and safety risks including latent risks; maintain an up to



date register of all hazardous substances and their Material Safety Data Sheets (MSDS). The Directors would arrange for health surveillance where identified by risk assessment and have someone competent to assess the risks. The Control of Substances Hazardous to Health Procedure details the assessment process, responsible persons in the organisational chart, the assessment and register proformas.

Asbestos

The Control of Asbestos Regulations (CAR) places duties on employers to manage the risks not included in the COSHH regulations. As such we will ensure, as far as reasonably practicable, all employees liable to disturb asbestos or otherwise be exposed, will be trained to an appropriate level. The company does not conduct any asbestos removal work either notifiable or non-notifiable, so awareness training will meet this requirement.

The company premise if constructed prior to 2000, is required as a minimum an Asbestos Management survey in line with HSG 264 to identify asbestos presence and its condition in the any building to aid the assessment process and management arrangements. The production building in which the company operates was constructed in 2007. Any risks will be communicated to all risk including employees, contractors and visitors. Please refer to Asbestos removal documentation provided by the landlord for other parts of the site.

Transport including Management of Occupational Road Risk (MORR)

Workplace transport has a wide scope of activity and vehicles from private light goods vehicles, fleet and HGV's to Fork Lift Trucks and other examples. These pose a danger to staff, visitors and contractors from impacts and crushing to falls from height when access the rear, or mechanical failure of lifting equipment as part of the vehicle. Our policy procedure details our arrangements for ensuring:

Vehicles are not driven or used without written and identifiable authorisation after having recognised competences i.e. driving licenses checked and periodically reviewed.

Responsibility is designated for carrying out assessments on the occupational road risk, and line management of driver operations.

Our premises have been assessed against recognised standards and guidance with measures implemented to reduce risks from workplace transport.

Loading and unloading operations are safe as far as is reasonably practicable, and with a view to eliminating falls from height.

The management does provide Information, Instruction, training and supervision on risks from workplace transport relevant to the business' undertakings.



Work at height

Work at height has a wide definition under the 2005 regulations as such it cannot be avoided in the company undertakings. To comply with legal minimum standards we will aim as far as reasonably practicable avoid working at height. Where eliminating this isn't reasonably practicable we will ensure competent people plan, supervise and carry out the work. This will involve training personnel to an appropriate level not just in technical skills but in specific training including Work at Height.

Activities will be assessed under MHSWR 1999 Regulations, work equipment will be selected considering suitability, environmental conditions and competency in erecting prefabricated access equipment.

Some work at height will require only simple solutions as recognised by the HSE. However, even ladders and other simple equipment will be subject to pre-use inspection and quarantine if found in a dangerous condition.

No person will be required to access fragile roofs or danger areas or to work at height where adverse weather is increasing risks to health and safety of workers or others potentially affected. Please refer to the detailed procedures for working at height.

Work Equipment including Lifting Equipment

Work equipment has a wide definition under the Provision & Use of Work Equipment Regulations (PUWER) but briefly includes machinery, equipment and tools whether owned or hired on lease.

PUWER places responsibilities on employers to assess risk under the Management of Health and Safety at Work Regulations 1999 and to ensure equipment is selected based on suitability. It must be in consideration of its intended environment and location. Ensuring work equipment is inspected, maintained and subject to thorough examination as applicable. All workers must receive appropriate information, instruction, training and supervision on its use as well as the hazards and controls associated with its use.

The company will ensure those duties are met through procedures and risk assessment.

See Provision of the user of work equipment regulations 2005 (PUWER) procedure.

Exposure to Vibration

The company have a variety of activities requiring mechanical fixing. Some tools in use include percussive / vibrating equipment, as does some fixed plant and machinery. The policy follows the Control of Vibration at Work (CVWR) Regulations 2005. The company carries out risk assessments to identify exposure limits and produce organisational controls such as staff rotation, a procurement policy which seeks to reduce vibration emissions to as low as reasonably practicable. Health surveillance is also provided on an annual basis for workers exposed to vibration emissions.



Confined Spaces

Work in confined spaces is strictly prohibited unless workers are authorised and trained to the relevant levels. Many of the companies' activities do technically fall within the Confined Space Regulations defined by statute where there is increased risk from hampered access.

Other hazards such as explosion, asphyxiation or other given within the meaning of the regulations will be subject to risk assessment and not entered into without relevant training and emergency arrangements in place. As an employer we would produce Permit to Work system for such tasks with trained personnel for both permit systems and confined space entry and rescue.

Management & Supervisors will not task others or enter into themselves work in confined space without training and authorisation. Confined Space Awareness training is not sufficient for Entry and Rescue it only enables workers to identify and avoid entry into confined spaces.