



Health & Safety Policy

The Company recognises that under the Health and Safety at Work Act 1974, it has a legal duty to ensure, so far as is reasonably practical, the health, safety and welfare of all its Company members and visitors to the Company. It also recognises that it has duties towards employed persons elsewhere that may use the products of this Company in their workplace.

Health and Safety at work is of primary importance to the Company, and an integral part of the responsibility of Executive Management. The Company has access to a local general practitioner (GP).

There is a system of joint consultation within the Company, through the safety committee, to promote good practice covering Health and Safety at work, to advise and assist Executive Management in these matters.

All Company Members are expected to accept their responsibilities to work safely, do everything reasonably practicable to prevent harm to themselves and others, use protective clothing and equipment where necessary and to adhere to safety rules.

The Company shall provide up to date instruction, training and information as required under the Health and Safety at work Act in order to maintain safe systems of work, throughout the Company.

Up-to-date information on the toxicity and potential hazards of all substances used by the Company will be available to those with a legitimate need for that information.

The Company will limit exposure to and, where necessary, monitor the use of substances hazardous to health as an ongoing priority. Particular care will be taken with the introduction of new substances and the risks will be assessed as required.

Gerry Beetles
Executive Chairman

January 2008

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Responsibilities and Accountability

Members Responsibility

Nothing contained in this document absolves Company Members from their responsibilities as defined in the Health and Safety at Work Act, and their responsibilities for the safety of themselves and their fellow Company Members.

Every Company Member is responsible for taking reasonable care of themselves and other persons who may be affected by their acts or omissions. Every Member has a duty to comply with the statutory provisions for Health and Safety at work, and whilst the Management system as listed in this policy will bring to the attention of individual Company Members such situations, the Company has a right to expect Company Members to act responsible as required by sections 7 and 8 of the Health and Safety at Work Act and in particular to: -

- Work safely and efficiently
- Use the protective equipment provided to meet statutory obligations or by mutual agreement.
- Report hazards and incidents that led to injury or damage or may have led to injury or damage.
- Adhere to Company procedures for securing healthy and safe working practices and places.
- Assist in the investigation of accidents, dangerous occurrences and near misses.
- Report to their immediate Team Leader/Manager all hazards that they cannot eliminate themselves.
- To co-operate in joint consultation on health and safety matters and to consult and co-operate with the appointed Safety Representatives.
- To seek first aid treatment for all injuries sustained at work.

Primary Responsibility

It is the responsibility of the Managing Director to ensure that all aspects of the Health and Safety Policy, Plans and Procedures within the Company are fulfilled in accordance with the Health and Safety at Work Act, and in compliance with the requirements of any applicable legislation.

Accountability

Departmental Managers are directly accountable to the Managing Director for ensuring the satisfactory maintenance of Safety Performance, Plans and Practices within their respective departments, and externally so far as the General Public are concerned.

All other types of responsibility and accountability are as follows: -

Managers

These persons are responsible for ensuring the first line supervision under them: -

- Understand the aims of the Policy.
- Are aware of the relevant legal, local and operational requirements.
- Have the necessary training and information to carry out these functions.
- They should encourage the line supervision that have to solve the day-to-day health and safety problems to seek their assistance and advice as required.
- Keep the appointed Safety Representatives in their areas of control informed on the appropriate Health & Safety matters that may affect the Company Members they represent.
- They will take the appropriate disciplinary action where there have been clear breaches of established Company Health and Safety Policy practices and systems of work.

Responsibilities of First Line Supervision

- They must ensure that they understand and implement the Company Health and Safety Policy within their immediate areas of control.
- They should be aware of all necessary legal interpretations, instructions, Codes of Regulations and factory systems of work that are brought to their attention by higher Management either through training courses, written or verbal instructions.
- They will be responsible for ensuring that the Company Members working under them are provided with the necessary information, instruction, training and supervision.
- They should ensure that all new Company Members are aware of the Company Health and Safety Policy and to check that they have received and understood the appropriate induction training.

- They should ensure that all work performed in their areas of responsibility meets legal standards, codes of Regulations, factory systems of work and accords to the aims of this Policy.
- They will be responsible for bringing to the notice of individual Company Members matters of discipline where the Company Members are in breach of Sections 7 and 8 of the Health and Safety at Work etc. Act 1974.
- They will bring the notice of their Departmental Managers matters which represent a breach of minimum legal requirements or non-compliance with the stated Policy that are beyond their capability to put right.
- They will be responsible for reporting accidents, dangerous occurrences, damage to plant and materials, and significant near misses to their departmental Managers.
- They will be responsible for ensuring that the necessary arrangements are made to enable representatives to attend Safety Committee meetings.
- They will inform the appointed Safety Representatives of any Health and Safety matters which may affect the Company Members they represent.
- They will be responsible for applying the procedure detailed by the Managers to discipline the members under their control who act in breach of established Company Health and Safety practices, Policies and Systems of work.

The Chairman of the Safety Committee is directly accountable to the Managing Director for all aspects of the function of the Committee including the regular holding of the meetings, the recording and issuing of minutes and the ultimate implementation of proposals and practices sanctioned and approved by the Managing Director and considered necessary and essential for safe and healthy working conditions. (In accordance with statutory requirements where laid down).

The Manufacturing Manager is accountable for: -

Maintaining the records appertaining to Health and Safety, and such certification as is required by legislation to include: -

- C.O.S.H.H Records and Procedures
- Provision and Use of Work Regulations (PUWER) 1998
- Lifting Operations and Lifting Equipment Regulations (LOLER) 1998

- General and Fire Risk Assessments
- Reports of Accidents and Dangerous Occurrences
- Providing data information for Senior Management.
- Investigating causes of accidents and hazardous incidents.
- Dealing with safety matters raised by Safety Representatives at any time between Committee meetings.
- Ensuring that all members adhere to statutory requirements.
- Monitoring Safety Performance.
- Instituting regular evacuation and fire fighting practice, and procedures.

The Senior First Aider is accountable to the Chairman of the Safety Committee for: -

Meeting all statutory requirements for the First Aid Regulations 1981.

3.3.3 Safety Committee

Objectives

To provide a recognised channel of communication between Company Members and Management for discussing matters of safety, and to provide a means of constructive co-operation in obtaining greater safety efficiency.

Committee Membership

The Committee will consist of Chairman, Secretary and representatives from Management, Unions or an elected person to represent departments.

Management Representatives

The Manufacturing Manager will represent Management for the purpose of providing adequate information to enable the Committee to function efficiently; other Company specialists may be, co-opted for particular meetings where subjects on whom they have particular expertise are to be discussed.

Union Representatives

Official representatives from each Trade Union, recognised by the Company, will be eligible to represent a department. Notice of their appointment or resignation will be given in writing by the full time Union Official.

Elected Representatives

In departments where no official union representative has been appointed, a person may be elected by a majority vote of their department to represent them.

Number of Representatives

Three representatives may be appointed or elected for the following areas: -

Production Floor including Goods Inward (two)

Main Office Block and Reprographics (one)

Meetings

Meetings will normally be held quarterly; the secretary must receive items for the agenda five working days before a meeting is scheduled. Only items on the agenda will be discussed at a meeting. Special meetings may be convened by Management or at the request of two committee members to deal with matters of special urgency.

Function of Safety Representatives

This is defined in regulation 4 of the Safety Representatives and Safety Committees Regulation 1977. Members of the Safety committee will provide consultative, advisory, and negotiatory channels in respect of all matters of safety concerning Company Members, premises, machinery, equipment and safe working methods and be of assistance to Management in implementing such requirements as are laid down in Government legislation and Codes of Practice.

Representatives make regular inspections of their departments reporting their findings to the supervisor. Any reported safety aspect that has not had an agreed solution should be raised on the agenda for the Safety Committee meeting.

3.3.4 First Aid Facilities

The Company undertakes to comply with the First Aid Regulations 1981 and ensure facilities conform to these requirements.

First aid facilities are located within the Company and are clearly identified by a first aid sign. A list of all qualified First Aiders with details of how they can be contacted, is posted on all main notice boards.

Responsibilities of Appointed First Aiders:

- Providing first aid treatment in the event of an accident or incident leading to injury.
- Recording details of the accident and treatment given.
- Maintaining their first aid box.
- Bringing to the attention of the Human Resources and Services Manager all accidents and incidents excepting those of a minor nature.

Maintaining first aid stocks, records and ordering of supplies will be the responsibility of the Senior First Aider.

Accidents

In the event of Company Members receiving an injury or a health hazard on the Company premises which results in an absence from work or medical attendance by a doctor or at a hospital then an accident report should be raised by the First Aider dealing with the accident.

The Member's Supervisor should conduct an investigation; in conjunction with a safety representative then complete and forward the accident report form.

Upon receiving an accident report, the Manufacturing Manager will ensure any action necessary is taken to avoid a recurrence. He will also be responsible for reporting accidents required by the Health and Safety Executive in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR).

Transporting

Should a Company Member need medical treatment that cannot be provided by a First Aider then the appropriate medical attention must be obtained.

Accidents of a serious nature should be transported to hospital by ambulance. A nominated First Aider who is qualified to drive a Company vehicle will take less serious accidents cases to hospital. When the First Aider has transferred the patient into hospital care, they should then return to their work place, having informed the patient to telephone the Company when hospital treatment has been completed. A nominated First Aider will then collect the accident case and return.

In the event that a Member is taken ill at work and as a result requested to go home. The individuals Team Leader/Manager should decide whether the Member is able to make the journey unaided. If assistance is needed then one of the nominated first Aiders will escort the member home and transfer them into the care of a responsible person.

3.3.5 Protective Clothing and Equipment

Every effort is made to provide the most suitable types of personal protective equipment for particular job functions undertaken by Company Members. Team Leaders will inform Company Members of jobs or processors where specific protection (PPE) is required, e.g., safety spectacles, ear defenders etc. Visitors to the plant who tour Production areas will be issued with PPE if required or alternatively keep within the marked gangways. Where Personal Protective Equipment (PPE) is issued, the Stores Person must ensure a record of issue and maintenance of the PPE is kept.

Prescription Safety Glasses

The Company provides prescription glasses under the following conditions: -

Prescription glasses will only be provided if authorised in writing by the Logistics Manager.

Authorisation will only be given if: -

- Deemed necessary for job function.
- Upon presentation of an optician's report on eye condition.
- Glasses will be provided through the Company's source.
- Replacements will only be provided if clauses i) and ii) are satisfied.
- Damaged or lost glasses will be replaced at the employee's expense (excluding fair wear and tear).
- The company does not pay for eye tests for safety glasses.

Prescription Glasses for Visual Display Screen Users

Those Company Members who have been identified as visual display screen users, under the Company's interpretation of the Health and Safety Display Screen Equipment Work Act, are entitled to an eye test and if necessary provided with a standard pair of prescription glasses.

An eye test will only be provided if authorised by the Logistics Manager.

Authorisation will only be given to those identified as 'display screen users'.

The eye test (for working with display screens only) will be undertaken by a Company appointed optician.

Glasses will only be approved upon presentation of the optician's report. Minimum cost glasses will be provided through the Company's source.

Damage or lost glasses will be replaced at the employee's expense (excluding fair wear and tear).

3.3.6 New Machine Tools and Equipment

Arrangements exist for the Manufacturing Manager to examine and ensure that all new machine tools and equipment installed is in a safe working condition prior to use.

3.3.7 Control of Substances Hazardous to Health (COSHH)

Company Procedures: -

SPO1 - Waste Disposal

SPO2 - COSHH

SPO3 – Emergency Procedure (Chemical Spillage)

Have been developed to ensure compliance with COSHH and Environmental regulations.

Departmental Team leaders and Managers are responsible for ensuring the Company Members in their areas are familiar with these procedures. That these procedures are compiled with in all aspects of control from identification, specification, purchase, storage, use and disposal. Also that relevant training and safety equipment usage is implemented in line with these procedural requirements.

The Technical Manager is responsible for ensuring ongoing compliance to the procedures through internal audits and monitoring, reporting any non-compliance to the Departmental Manager and agreeing actions required to ensure compliance is taken in a timely manner.

3.3.8 Fire Precautions

A group of Fire Team Members has been appointed which is responsible to the Fire Team Leader, in order to ensure safe evacuation and preliminary fire control in the event of any outbreak of fire.

A notice giving procedure and action in the event of the fire alarm sounded is displayed on main notice boards. The Manufacturing Manager is responsible for ensuring safe evacuation procedures are carried out.

The assembly area is located on the left hand side of the main car park at the rear of the factory and evacuation route signs show means of escape.

A fire evacuation drill (un-announced) will be held twice a year.

All personnel must respond to a fire call and then report to their Team Leader/Manager. Managers must report any one from their department who is not accounted for to the Manufacturing Manager who will be situated near the reception area.

Each member of the Fire Team has been allocated a search area and any person found during the search who has not responded to the evacuation procedures will be forcibly removed.

Outside normal working hours Team Leaders/Managers or nominated individuals will ensure their sections are clear.

All personnel must remain within the assembly area until the Manufacturing Manager gives approval to return to the work place.

Visitors are the responsibility of their hosts, and should conform to the host's evacuation procedure.

3.3.9 Training

Part of the training of Managers, Team leaders and other Company Members is directed towards Health and Safety. The Company recognises the need for adequate and appropriate training to meet the requirements of the Health and Safety at Work Act and other legislation, which have been introduced from time to time.

3.3.10 Plant Maintenance

Plant and systems of work will be maintained in a condition, as far as is reasonably practicable, to ensure they are safe and without risks to health.

The Manufacturing Manager has a responsibility to see that systematic inspections are carried out, registers and certificates are maintained and that there are regular and recorded inspections of: -

- Power and Brake Presses
- Machine Safety Devices
- Cranes and Lifting Equipment
- Portable Power Tools
- Abrasive Wheels
- Electrical Apparatus
- Fire Extinguishers and Audible Fire Warning Systems
- Ladders and Scaffolding
- Pressure Vessels

All defective plant and equipment will be withdrawn from use until faults are rectified.

3.3.11 Transport

Drivers of all vehicles on site will keep to the traffic routes indicated and observe the speed limits displayed.

Drivers of fork lift trucks and similar material handling vehicles are responsible for efficient and careful use of such vehicles. Handling will be restricted to authorised persons who have received training on their driving operation by a trained instructor and certified as such. Drivers of all Company owned vehicles have the responsibility of ensuring that their vehicles at all times comply with the requirements of statutory legislation and the Road Traffic Act and that they drive in compliance with the law. They are also required to report defects and ensure that vehicles are subject to regular servicing.

3.3.12 Site Housekeeping

The Company insists on maximum effort, which involves the maintenance of good housekeeping as the basis of a sound Health and Safety programme. Its Managers and Team Leaders will be jointly responsible for ensuring good arrangements for: -

- Labelling of all substances.
- Safe storage of clothing, tools and waste.
- Safe storage of flammable and dangerous substances.
- Adequate space for storage of raw materials, components and parts.
- Adequate and clearly marked gangways.
- Adequately equipped and marked First Aid Facilities and points.
- Clearly marked fire fighting equipment.

3.3.13 Procedure for Visitors to the Company

All visitors must report to the Reception and sign the visitor's book.

All visitors must be met and collected from reception, and leave the premises via the Reception on completion of their visit.

The person receiving the visitor will be responsible for their safety and welfare whilst on the Company's premises.

In the event of a fire emergency, the person receiving the visitor should take them to the normal fire assembly point.

In the case of a visitor receiving injury whilst on the premises, treatment should be given on site and recorded in the accident book.

Details should also be given to the Manufacturing Manager for notifying the visitor's Company, and for dealing with any subsequent enquiry.

3.3.14 Duties of Contractors on Site

Contract work of any nature will not be allowed unless sanctioned by the Manufacturing Manager.

The Manufacturing Manager will ensure that contractors are properly introduced to the site and that such contractors employ safe working practices.

Relevant Health and Safety features i.e., First Aid Point, Fire Evacuation Procedure etc will be discussed with contractors prior to commencement of works.

It will be the responsibility of contractors whilst on site to employ safe working practices as required by sections 2, 6, 7 and 8 of the Health and Safety at Work Act 1974 and to remove from site any toxic waste substances which may result from works carried out.