

# **Parts Alliance Group Holdings Ltd.**

## ***Health & Safety Policy*** ***2020***

### **Revision 5.0**

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## 1. Health & Safety Policy Statement

*PA Group Holdings Ltd (PAGH) and its Holding and all Subsidiary Companies, are committed to a policy of effectively managing all aspects of Health, Safety and Welfare. This commitment extends to all Business Units, Branches, employees and others affected by our operations.*

PAGH recognises that achieving high standards of Health & Safety is an integral part of Business performance. Whilst all statutory provisions will be complied with as a minimum, the Company will take all reasonably practicable measures to ensure continual improvement in Health and Safety standards by setting appropriate objectives and targets.

Management accepts that it has the overall responsibility for Health, Safety and Welfare. The Directors will ensure that such resources, facilities, finances, information, instruction, training and supervision are provided, as is necessary, to minimise the risk of injury or ill health and to maintain a positive Health & Safety culture and performance throughout the Company.

Management at each Branch is responsible for the implementation of this Policy and for ensuring risks to the Health & Safety of all persons are assessed and safe systems of work devised in line with this Policy.

The Company is also committed to ensuring that the behaviour of our people, at all levels, is consistent with an improving safety culture.

Our vision is to create and maintain an environment where care for our people, and those who work with us, is our top priority; where the belief that all accidents are preventable prevails.

All employees and contractors are expected to co-operate with PAGH in the implementation of this Policy. They will ensure that their own work, so far as is reasonably practicable, is carried out with minimum risk to themselves or others.

Consultation with staff and operatives will be structured to ensure feedback is encouraged to continually improve safe systems of work and prevention of ill-health.

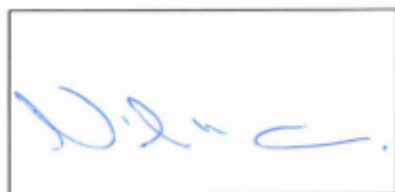
This Policy Statement will be issued to all employees, uploaded to the internal Company Intranet, displayed prominently at all workplaces and be available on request to all interested parties. The organisation and arrangements for implementation of the Policy will also be available on the Intranet and at all workplaces for reference by any employee as required.

The Health & Safety Policy is continually being monitored and developed and will be formally reviewed annually, though on exception amendments may be implemented at other times as required by legislative changes or work practices.

**Neil Croxson**

**President & Chief Operating Officer, The Parts Alliance Group Holdings (PAGH)**

Signed:



Dated: 22 January 2020

## 2. Requirements for Effective Health and Safety Management

The Management of Safety and Health is as much an integral element of management responsibility as Operational, Financial, Facilities, Quality and Environmental Management. Safety and Health Management is concerned with conserving resources by minimizing losses arising from accidents and from injury and ill health to people - both employees and others.

PAGH acknowledges its duty to comply with the Health & Safety at Work etc Act 1974. PAGH will do all that is reasonably practicable to provide a safe and healthy working environment to all employees and non-employees i.e. visitors, contractors etc., paying particular attention to:

- Provide adequate resources to maintain health & safety.
- Carry out risk assessments and review them when necessary.
- Provide and maintain safe plant and systems of work.
- Safe use, storage, handling and transportation of articles and substances.
- Provide employees with adequate information, instruction, training and supervision as is necessary to secure their safety and health at work and that of others who may be affected by their actions.
- Make adequate provision and arrangements for welfare facilities at work.
- Keep the workplace safe and ensure that access and exits are safe and without risk.
- Monitor safety performances to maintain agreed standards.

In addition to the above objectives the Executive expects Directors and Managers at all levels, throughout PAGH to:

- Ensure that everything reasonably practicable is done to prevent injury to personnel, damage to property and to protect individuals from hazards at work. This includes members of the general public, legitimate visitors, contractors and their employees.
- Ensure that all employees are aware that it is their duty to do everything they can to prevent injury and to ensure the health, safety and welfare of themselves and their colleagues.

To sustain the level of importance given to Safety, Health and the Environment it is imperative that a supportive culture is in place throughout PAGH. To achieve this all Directors and Managers are to ensure that due attention is paid to the following areas:

**CONTROL** - Procedures are in place to plan, measure, audit and review performance.

**CO-OPERATION** - Awareness, participation in a commitment to a healthy and safe working environment will be actively encouraged.

**COMMUNICATION** - An effective means of communication on safety and health matters is to be established.

**COMPETENCE** - Specific and general awareness training is to be available to all staff to ensure that they are competent to undertake any task assigned to them.

**RISK MANAGEMENT** - The Management of Health & Safety at Work Regulations 1999 requires the identification of hazards and the suitable and sufficient assessment of risks. Assessments must lead to management action to ensure those risks are controlled and kept as low as reasonably practicable.

Safety, Health and the Environment are a line management responsibility and the Executive expects both Directors and Managers to take steps to ensure that every employee, at all levels throughout PAGH are aware of its policy and objectives. The company will be adopting the HSE Core Elements tool (HSG 65) to work in conjunction with all new and existing risk management systems.

## Policy Review Procedures

In order for the Policy to be an effective tool for communicated Health, Safety and Welfare to all its employees, PAGH will have written procedures in place to review and update this Policy when it is deemed necessary either by Management, Employees or any significant changes to statutory requirements under current legislation, or any new legislation which may come into force in the future.

### 3. Health & Safety Executive (HSE) Core Elements

PAGH has a legal duty to put in place suitable arrangements to manage for health and safety. As this can be viewed as a wide-ranging, general requirement HSE encourages a common-sense and practical approach. *It should be part of the everyday process of running the organisation and an integral part of workplace behaviours and attitudes.*

The keys to effectively managing for health and safety are:

**Leadership and management (including appropriate business processes) and a trained/skilled workforce operating in an environment where people are trusted and involved.**

The HSE advocates that all these elements, underpinned by an understanding of the profile of risks the organisation creates or faces, are needed. This links back to wider risk management and can be pictured in the following diagram:



**“Success hinges on the attitudes and behaviours of people in the organisation.”**

#### 4. Company Structure & Organisation

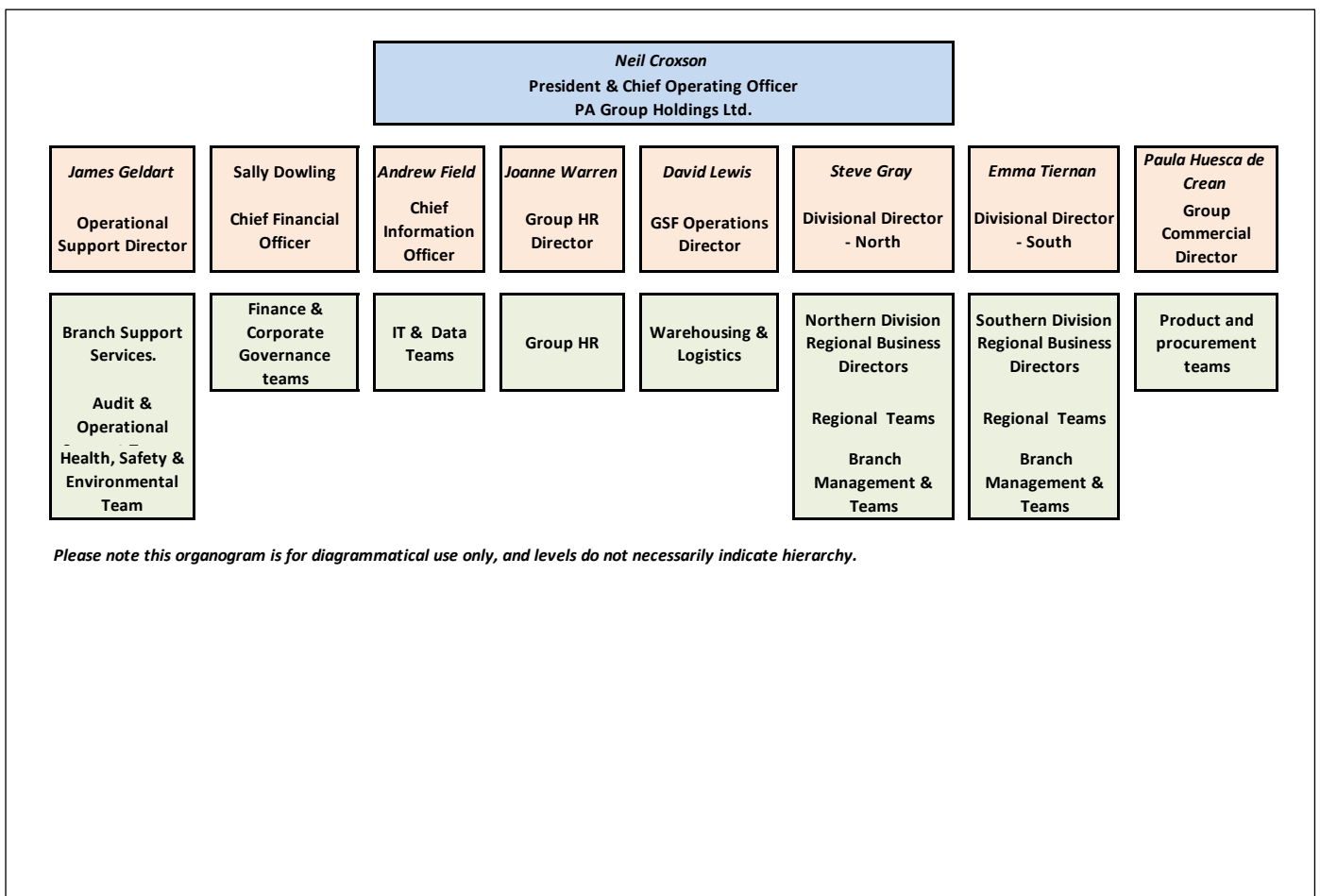
The Health and Safety at Work etc. Act 1974, also referred to as HSWA, is the primary piece of legislation covering occupational health and safety in the UK. Under HSWA, employers have a duty to provide a safe place of work and protect the health and safety of their employees and others that may be affected by their work activities. It also places duties on employees to cooperate with their employer, so far as is necessary, to enable their employer to comply with his health and safety duties as set down under HSWA and under relevant legislation.

The effectiveness of the Safety Policy is dependent on the people who are responsible for ensuring that all aspects of work, whether in the Company offices or on the shop floor are carried out with due consideration for safety and with minimum risk to health. PAGH will ensure that this Policy is applied and is adopted by all operatives and visitors to sites.

Each individual person has a duty of care to themselves and other persons who may be affected by their actions or omissions.

Any recognised breach of Health and Safety legislation or any potential hazard observed while at work is to be reported.

In order that this can be achieved PAGH has a management structure as outlined below with individual responsibilities detailed on the following page.



## 5. Responsibilities

**5.1 President & Chief Operating Officer (COO)** of PAGH is responsible for the overall arrangements and for ensuring that the Company's operations are executed at all times in such a manner as to ensure, so far as is reasonably practicable, the Health, Safety and Welfare of all employees and others who may be affected by its operations.

In particular, the Chief Operating Officer will:

- Ensure there is an effective Company Policy for Health and Safety and that all employees, contractors and temporary workers are made aware of their individual responsibility.
- To understand and ensure, through the appointment of competent persons, that the company's responsibilities as employers under the Health and Safety at Work etc. Act 1974 and any relevant Acts of Parliament and Statutory Instruments are met.
- To ensure that all Directors and Managers understand and fulfil their responsibilities regarding Health & Safety.
- Arrange for funds and facilities to meet the requirements of company policy and legislation.
- Make provision for adequate and appropriate training to be given to all employees. Either by line management teams or the Social Learning Platform.
- To ensure that notification and reporting procedures to the relevant statutory authorities are carried out.
- Set a personal example on all matters of Health & Safety.
- Delegate specific Health & Safety duties to the Operational Support Director.

**5.2 Operational Support Director** is accountable to the COO for all matters relating to Health, Safety and Welfare of employees and those affected by the Company's operations.

In particular, the Operational Support Director with regard to Health and Safety will:

- Understand and ensure that the implications and duties imposed by new Acts of Parliament, Statutory Instruments, HSE Guidance Notes and Codes of Practice are brought to the attention of the Directors.
- To bring Company related Health & Safety matters to the attention of the Directors at regular intervals.
- To ensure that good communications exist between employer and employees and are maintained.
- Liaise with the persons appointed in the role of Safety Managers and Officers over the full range of their duties and responsibilities, with respect to inspections, audits, report recommendations, changes in legislation and advice obtained from other sources.
- Ensure adequate means of distributing and communicating Health, Safety and Welfare information obtained for the HSE, Safety organisations and Trade associations regarding

new techniques of accident prevention, new legislation requirements and codes of practice etc.

- Ensure that an adequate programme of training for health and safety is established and that the safety culture is encouraged amongst employees.
- Ensure that all teams comply with training allocated to them via the Social Learning Platform and complete on a timely basis.
- Implement Health & Safety Policy and Plan, including for Accident & Incident Investigation.
- Always set a personal example by using the correct personal protective clothing/equipment and following all safety requirements and procedures.

### **5.3 Health, Safety & Environmental Managers / Officers**

The primary role of the Safety Manager / Officer is to advise Directors and Managers on all Safety, Health and Welfare matters to ensure the Company complies with its statutory obligations.

In particular, the Safety Managers/Officers will:

- Understand the application of the Health and Safety at Work, etc. Act 1974 and other legislation relevant to the Company's business.
- Keep up to date with changes in current legislation and to bring to the attention of the Directors any relevant new legislation.
- Formulate, review and amend Health & Safety Policy.
- Attend such courses/seminars run by external sources to enable accurate interpretation of legislation to enable implementation within the organisation.
- Ensure that all "assessments" as required by legislation are conducted and reviewed at relevant intervals and to maintain records of the same.
- To recommend control measures and advise on the standard of PPE issued to employees.
- Conduct Health & Safety Inspections and prepare reports of all the Company's operations.
- Immediately contact the Operational Support Director if situations are found, that in the opinion of the Safety Manager/Officer, require immediate rectification or the stopping of any operation.
- To notify the Operational Support Director if the corrective action agreed after any workplace inspection is not implemented by the arranged date.
- To carry out investigations into all accidents and near-miss incidents and to record the findings on the relevant forms.
- Advise the HSE and Insurers of all incidents reportable under RIDDOR.



- To arrange Health surveillance if deemed necessary.
- To highlight areas where training/certification is required to meet the standards imposed by Legislation, Approved Codes of Practice, or HSE guidance.
- To enforce and review Health & safety training modules and documents are completed via the Social Learning Platform and to communicate the information to the Directors/Managers where appropriate.
- To bring new techniques for improving health, safety and welfare to the attention of the Director responsible for health and safety.
- To set a personal example by wearing appropriate personal protective clothing/equipment and observing all safety requirements/procedures.

#### **5.4 Senior Directors, Regional Directors, Regional Managers & Branch Management Teams**

Each Director / Manager / Department Head are responsible for their personal safety and that of all personnel under his or her authority, including others who may be affected by the company's activities.

In particular, they will:

- Understand and implement Company Health & Safety Policy.
- Appreciate the responsibilities of personnel under their authority and ensure that each employee knows his/her responsibility and are equipped to play their part.
- Conduct Risk Assessments on activities within their department ensuring that the methods and systems of work are safe. Also, that the necessary procedures, rules and regulations designed to achieve this are formulated, published and applied.
- Provide written instructions of work methods outlining potential hazards and precautions, and ensure they are complied with.
- Ensure accident and near miss reporting procedures are understood and complied with and assist with accident investigations where appropriate.
- Ensure all employees and sub-contractors are suitably trained/competent to carry out the prescribed task and that the necessary licenses/certificates of competence are in force and appropriate.
- Co-ordinate Health & Safety training activities and the provision of information to persons at work.
- Ensure the Statutory Notices, the Safety Policy, Insurance Certificate and the names of Appointed First Aiders are displayed and maintained in prominent locations.
- Ensure all Health & Safety training issued via the Social Learning Platform is completed in the timeframes allocated.

- Ensure that all new employees in the company are provided with a copy of the Policy Statement, receive such induction training as may be laid down in procedures, are issued with personal protective equipment as required and their personal responsibilities as set out in this document.
- Set a personal example with regard to health and safety matters.

## 5.5 All Employees

The Management of Health and Safety at Work Regulations 1992 (MHSWR) re-enacts the Health and Safety at Work etc. Act 1974, which places responsibilities on the employer and employees alike. In this connection, the Company reminds employees of their duties under Section 7 of the act:

- ❖ ***to take care for their own health and safety and that of others who may be affected by their acts or omissions.***

Additionally, employees must also co-operate with the company to enable it to discharge its own responsibilities successfully.

Furthermore, all employees are expected to:

- Carry out assigned tasks and duties in a safe manner, in accordance with instructions, and to comply with safety rules/procedures, regulations and codes of practice.
- To complete any Health & Safety training modules and documents issued to them via the social learning platform.
- If aware of any unsafe practice or condition, or if in any doubt about the safety of any situation, inform their supervisor.
- Obtain and use the correct tools/equipment for the work and not to use any that are unsafe or damaged. All tools, equipment and personal protective equipment must be stored in the approved place after use.
- Ensure that all guards are securely fixed, and that all safety equipment and personal protective clothing/equipment provided are used.
- Not to operate any plant or equipment unless authorised.
- To report any accident, near-miss, dangerous occurrence or dangerous condition to their line management.
- To switch off and secure unattended plant or equipment.
- To avoid improvised arrangements and suggest safe ways of eliminating hazards.
- Not to intentionally interfere with, misuse or wilfully damage anything provided for the purpose of Health & Safety at work.

- Not to participate in horseplay or place fellow employees in danger by their actions.

## **6. Terms of Reference**

### **Health & Safety Instruction and Training**

Directors and Managers, in conjunction with the Health & Safety Manager/Officer, are responsible for the identification of the general and specific Health & Safety Instruction and Training needs of all persons at work.

### **Health & Safety Information**

Managers, in conjunction with the Health & Safety Manager/Officer, will ensure the dissemination of comprehensible and relevant Health & Safety information to all persons at work. The Company Intranet will be regularly updated to provide all relevant Health & Safety information which can then be acquired or read by any persons at work.

### **Joint Consultation**

Directors and Managers will ensure that there is an effective system for joint consultation with Employees on Health & Safety related issues.

### **Risk Assessment, Method Statements (RAMS) and Safe Systems of Work**

The Company recognises its duty as an employer to undertake suitable and sufficient risk assessments which, in some cases, may lead to formally documented health and safety management systems, including the preventive and protective measures necessary to prevent or control exposure to hazards.

RAMS will be undertaken and, where necessary, appropriate preventive and protective measures prepared, documented and implemented by managers for those workplaces, activities and tasks where there is a risk of injury or occupational ill-health.

RAMS will be reviewed regularly.

All Staff will be given instruction on the appropriate RAMS on initial Induction and at regular intervals thereafter. This instruction will be recorded via the Social Learning Platform so that confirmation of understanding is electronically time and date stamped.

### **Safety Monitoring and Hazard Reporting**

Managers will ensure there is an effective system of safety monitoring at individual locations, including regular workplace inspections. Recommendations arising from safety monitoring will be implemented as far as is reasonably practicable.

A formal procedure, whereby persons at work may report hazards and shortcomings in protection arrangements, will be maintained.

Near-miss/Hazard reporting can also be

### **Accident and ill- Health Reporting, Recording and Investigation**

Managers will ensure there is an effective system for the reporting and recording of accidents and ill-health involving persons at work, visitors and contractors' employees in accordance with current legal requirements.

All accidents and cases of occupational ill-health must be investigated with a view to identifying the causes, both direct and indirect, and remedial measures to prevent recurrences. Remedial measures arising from investigation must be implemented forthwith.

### **Welfare Provisions**

Managers will ensure that adequate welfare amenity provisions i.e. sanitation, hand washing, drinking water and facilities for taking meals, are provided and properly maintained in accordance with current legislation and procedures.

### **First Aid Arrangements**

Managers will ensure adequate provision of first aid treatment for employees and other persons present. The company has in place fully qualified (HSE Approved) first aiders with on-going refresher training as required under the regulations and L74 codes of practice.

It is the responsibility of all first aid personnel to ensure adequate stocks of first aid supplies and ensure an appropriate and speedy treatment to the injured person.

All first aiders will be able to access written procedures from the H&S management systems and familiarise themselves with these procedures should an ambulance be required.

Special arrangements will be implemented should there be a need to evacuate an injured person from the cast area that is unable to be moved or may be unconscious.

### **Occupational Health**

The Directors consider pro-active Occupational Health as a major part of the company's long-term strategy to combat work related illness and conditions. For the foreseeable future an Occupational Health Service will be available on an 'as and when' basis with the view to increase this service should it be deemed necessary.

### **New Work Equipment and Project Work**

Managers will ensure that all new work equipment, processes and project work do not expose persons at work to risk of injury and/or ill-health. RAMS will be put in place and communicated to the relevant workforce prior to first use of equipment or start of new works.

### **Maintenance of the Workplace, Equipment, Systems and Devices**

Managers will ensure there is a satisfactory and effective system for maintaining workplaces, equipment, safety systems and safety devices in an efficient state, in efficient working order and in good repair, including the frequent examination, testing and maintenance of any equipment and any safety systems and safety devices to such equipment.

### **Emergency Procedures**

Managers will ensure that there is a formally established procedure to cover identified major emergencies, including the appointment of competent persons to oversee the implementation of any evacuation procedures.

### **Contractors' activities**

Managers will ensure there is an effective procedure for regulating the activities of all Contractors in accordance with the Company's Health & Safety Procedures.

## **Hazardous Substances**

Managers will ensure that substances classified as 'hazardous to health' are identified, assessed and controlled in such a way as to prevent risk of injury or ill-health to persons at work during their use, handling, storage or transport at work.

Managers will ensure that flammable and explosive substances are identified and controlled in such a way as to prevent the risk of fire and explosion during their use, handling, storage or transport at work.

Managers will ensure that sufficient information relating to the hazards and precautions necessary in the use handling, storage and transport of hazardous substances is provided to persons at work who may be exposed to such substances.

## **Security and Violence at Work**

Managers will take all reasonably practicable measures to protect all persons at work from physical assault, harassment, bullying, and vandalism, theft of property and arson.

## **Fire Prevention and Protection**

Managers will ensure that arrangements for fire prevention and protection are adequate and maintained. Fire drills will be undertaken on at least a twice-yearly basis.

Fire Risk Assessments will be undertaken throughout the company and reviewed annually thereafter.

Managers will ensure that there are competent fire marshals in place to deal with a mass evacuation from both warehouse and office areas in accordance with the fire procedures.

Predominantly the branch manager (or designated manager) on site will have direct responsibility to liaise with the emergency services and co-ordinate the evacuation.

## Current Health & Safety Legislation

The following statute and regulations ('the relevant statutory provisions') apply to the Company's operations and activities.

- Health and Safety at Work etc. Act 1974
- Confined Spaces Regulations 1997
- Control of Substances Hazardous to Health Regulations 1999
- Control of Noise at Work Regulations 2005
- Electricity at Work Regulations 1989
- Employers' Liability (Compulsory Insurance) Regulations 1999
- Environmental Protection Act 1990
- Health and Safety (Consultation with Employees) Regulations 1996
- Health and Safety (Display Screen Equipment) Regulations 1992
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Health and Safety (First Aid) Regulations 1981
- Health and Safety (Information for Employees) Regulations 1998
- Highly Flammable Liquids and Liquefied Petroleum Gases Regulations 1972
- Lifting Operations and Lifting Equipment Regulations 1998
- Management of Health and Safety at Work Regulations 1999
- Manual Handling Operations Regulations 1992
- Personal Protective Equipment at Work Regulations 1992
- Provision and Use of Work Equipment Regulations 1998
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995
- Safety Representatives and Safety Committees Regulations 1977
- Working Time Regulations 1998 Workplace (Health, Safety and Welfare) Regulations 1992
- Work at Height Regulations 2005
- Regulatory Reform (Fire Safety) Order 2005
- Safety, Health and Welfare at Work Act 2005 **(ROI)**
- Safety, Health and Welfare at Work (General Application) Regulations 2007 **(ROI)**
- Guidance on the SHWW (Reporting of Accidents and Dangerous Occurrences) Regulations 2016 **(ROI)**

## 7. Arrangements

The Hazards that can arise and the precautions necessary on the part of all persons at work:

<p><b>Hazards: 7.1</b></p> <p>Careless/Unsafe Behavior</p>	<p><b>Precautions DO:</b></p> <ol style="list-style-type: none"> <li>1. Take reasonable care for your health and safety and that of other persons, including members of the public.</li> <li>2. Co-operate with management to enable them to comply with legal requirements.</li> <li>3. Keep your working area clean and tidy.</li> <li>4. Wear protective clothing/equipment provided as instructed.</li> </ol>	<p><b>Precautions DO NOT:</b></p> <ol style="list-style-type: none"> <li>1. Intentionally or recklessly interfere with or misuse anything provided for the purpose of health and safety at work.</li> <li>2. Ride on Forklifts or trolleys.</li> <li>3. Remove guards from machinery.</li> <li>4. Walk on slippery floors or paths, especially when wet.</li> </ol>
<p><b>Hazards: 7.2</b></p> <p>Imminent Danger</p>	<p><b>Precautions DO:</b></p> <ol style="list-style-type: none"> <li>1. Inform your immediate manager of any work situation which represents a serious and immediate danger or where there may be a shortcoming in management's protection arrangements.</li> </ol>	<p><b>Precautions DO NOT:</b></p> <ol style="list-style-type: none"> <li>1. Attempt to enter any area you are not authorized to enter.</li> <li>2. Attempt to operate a machine or any piece of equipment you are not authorized or trained to use.</li> </ol>
<p><b>Hazards: 7.3</b></p> <p>Fire</p>	<p><b>Precautions DO:</b></p> <ol style="list-style-type: none"> <li>1. Operate the nearest fire alarm on discovering a fire.</li> <li>2. Leave the workplace immediately by the nearest available exit on hearing the fire alarm and report to your Manager/ Fire Marshall at your evacuation safety point.</li> <li>3. Store flammable substances safely and separately.</li> <li>4. Store wastepaper and packaging materials in the bins provided.</li> <li>5. Dispose of cigarette ends carefully.</li> <li>6. Report defective electrical sockets, plugs, wiring and appliances to your Manager.</li> <li>7. Keep fire exits unobstructed.</li> <li>8. Ensure you are aware of the evacuation procedure and means of escape together with your assembly point.</li> <li>9. Ensure adequate ventilation when charging batteries.</li> </ol>	<p><b>Precautions DO NOT:</b></p> <ol style="list-style-type: none"> <li>1. Store flammable materials carelessly.</li> <li>2. Allow waste to build up near fire exits or ignition sources.</li> <li>3. Willfully use or misuse firefighting equipment.</li> <li>4. Use electrical equipment that is faulty or if the cable is worn or scuffed.</li> <li>5. Smoke in non-smoking areas.</li> <li>6. Overload electrical sockets.</li> <li>7. Block or obstruct walkways, extinguishers and/or fire exits.</li> </ol>

<p><b>Hazards: 7.4</b></p> <p>Slip, Trips and Falls</p>	<p><b>Precautions DO:</b></p> <ol style="list-style-type: none"> <li>1. Be careful when walking.</li> <li>2. Report tripping hazards to your Manager.</li> <li>3. Wear suitable footwear.</li> <li>4. Use the correct access equipment when you cannot reach items.</li> <li>5. Be aware of obstructions sticking out.</li> </ol>	<p><b>Precautions DO NOT:</b></p> <ol style="list-style-type: none"> <li>1. Read whilst walking on staircases and surfaces that may be slippery.</li> <li>2. Leave the bottom draw of a filing cabinet open.</li> <li>3. Stand on swivel chairs to reach overhead items.</li> <li>4. Wear unsuitable footwear that may cause you to slip, trip or fall.</li> <li>5. Run anywhere in the workplace.</li> </ol>
<p><b>Hazards: 7.5</b></p> <p>Work Equipment</p>	<p><b>Precautions DO:</b></p> <ol style="list-style-type: none"> <li>1. Use any work equipment in accordance with the instructions and training provided and only for the purposes intended.</li> <li>2. Report defects in work equipment to your Manager.</li> <li>3. Use hand tools carefully and only for their correct purpose.</li> <li>4. Ensure guards are in place before using any machinery.</li> <li>5. Isolate all electrical machinery before maintenance is undertaken.</li> <li>6. Follow the manufacturer's instructions in the correct use of the equipment.</li> <li>7. Isolate electrical equipment before test or repair.</li> </ol>	<p><b>Precautions DO NOT:</b></p> <ol style="list-style-type: none"> <li>1. Use defective or dangerous work equipment.</li> <li>2. Attempt to modify or repair work equipment.</li> <li>3. Use any equipment you have not been trained to use.</li> <li>4. Override or interfere with interlock guards, or safety devices fitted to the equipment.</li> <li>5. Operate any equipment deemed unsafe by a Supervisor.</li> <li>6. Use work equipment for a purpose for which it was not designed.</li> </ol>
<p><b>Hazards: 7.6</b></p> <p>Manual Handling</p>	<p><b>Precautions DO:</b></p> <ol style="list-style-type: none"> <li>1. Avoid the need to lift any loads manually.</li> <li>2. Use mechanical methods as a preferred option.</li> <li>3. Lift all loads carefully and in accordance with the manual handling training and instruction guidelines.</li> <li>4. Report manual handling hazards to your Manager.</li> <li>5. Any load over 20Kgs should be completed by two persons or split into smaller loads.</li> </ol>	<p><b>Precautions DO NOT:</b></p> <ol style="list-style-type: none"> <li>1. Lift any object without an appropriate risk assessment being carried out prior to the lifting tasks.</li> <li>2. Attempt to lift anything if you feel it is beyond your physical capability.</li> <li>3. Lift loads if you are a young person, pregnant or have a medical condition (e.g. musculoskeletal disorders)</li> </ol>



<p><b>Hazards: 7.7</b></p> <p>Electricity</p>	<p><b>Precautions DO:</b></p> <ol style="list-style-type: none"> <li>1. Check that wires, leads, connections, plugs and sockets are in sound condition and that plugs are properly connected to the appliance.</li> <li>2. Ensure that flexes are not allowed to trail across floors.</li> <li>3. Isolate all electrical machinery before maintenance is undertaken.</li> <li>4. Switch off, remove the plug and report to your Manager in cases where an electrical appliance may appear to be defective or dangerous.</li> <li>5. Report to your Manager any dangerous wiring, defective connections and overheating of electrical appliances.</li> </ol>	<p><b>Precautions DO NOT:</b></p> <ol style="list-style-type: none"> <li>1. Attempt to repair defective electrical appliances, cables, flexes, plugs or sockets.</li> <li>2. Use defective electrical appliances.</li> <li>3. Touch or attempt to move electrical appliances with wet hands.</li> <li>4. Use a fused multi-socket block where more than one appliance is supplied from a power point.</li> <li>5. Overload electrical sockets.</li> <li>6. Use any form of temporary wiring.</li> </ol>
<p><b>Hazards: 7.8</b></p> <p>Housekeeping and Cleaning</p>	<p><b>Precautions DO:</b></p> <ol style="list-style-type: none"> <li>1. Keep working areas tidy, returning equipment and materials to their correct storage points at the end of each day.</li> <li>2. Keep your working area clean.</li> <li>3. Ensure wooden pallets are returned to the suppliers or stored safely.</li> <li>4. Pay special attention to loose screws and nails in pallets.</li> <li>5. Avoid spilling electrolyte when topping up batteries.</li> <li>6. Keep floors clear of obstruction.</li> <li>7. Clean up any spillages immediately.</li> </ol>	<p><b>Precautions DO NOT:</b></p> <ol style="list-style-type: none"> <li>1. Work untidily.</li> <li>2. Leave waste materials on the floor.</li> <li>3. Obstruct walkways and/or fire exits with waste and materials.</li> </ol>
<p><b>Hazards: 7.9</b></p> <p>Stacking and Storage</p>	<p><b>Precautions DO:</b></p> <ol style="list-style-type: none"> <li>1. Ensure goods are stacked on the shelving or racking provided, or in a separate designated storage area.</li> <li>2. Ensure marked gangways are kept clear at all times.</li> <li>3. Ensure your route is clear before stacking materials.</li> <li>4. Ensure suitable PPE is worn at all times.</li> </ol>	<p><b>Precautions DO NOT:</b></p> <ol style="list-style-type: none"> <li>1. Obstruct the gangways.</li> <li>2. Place frequently used items out of reach.</li> <li>3. Stack loads higher than necessary as to cause loads to fall onto others.</li> </ol>

<p><b>Hazards: 7.10</b></p> <p>Work at Height</p>	<p><b>Precautions DO:</b></p> <ol style="list-style-type: none"> <li>1. Store ladders only on the racks provided.</li> <li>2. Ensure ladders are safe before use.</li> <li>3. Ensure the correct pitch of the ladder (one out four up) prior to using.</li> <li>4. Ensure a ladder is correctly secured at its upper resting place.</li> <li>5. Report defects in ladders to your Manager.</li> <li>6. Use necessary PPE when working at heights e.g. harness.</li> <li>7. Ensure all tools and materials will not fall from height onto others working or passing below.</li> <li>8. Follow safe systems and use appropriate equipment for long duration of work rather than a ladder e.g. tower, mobile, elevating work platform (MEWP).</li> </ol>	<p><b>Precautions DO NOT:</b></p> <ol style="list-style-type: none"> <li>1. Use defective ladders.</li> <li>2. Climb a ladder at the wrong pitch.</li> <li>3. Attempt to reach items which are out of reach.</li> <li>4. Use a ladder which has been modified or painted.</li> <li>5. Assemble towers if you have not been trained to do so.</li> <li>6. Operate a mobile, elevating work platform (MEWP) if you are not qualified to do so.</li> <li>7. Allow people to work below or in close proximity to work being carried out at height.</li> <li>8. Work on a roof.</li> </ol>
<p><b>Hazards: 7.11</b></p> <p>Hazardous Substances</p>	<p><b>Precautions DO:</b></p> <ol style="list-style-type: none"> <li>1. Check safety data sheets for correct storage and handling.</li> <li>2. Use substances in accordance with manufacturers' instructions.</li> <li>3. Keep the lids on the substances unless for immediate use.</li> <li>4. Take care to avoid spillages of substances.</li> <li>5. Deal with spillages immediately using the appropriate spillage control process.</li> <li>6. Take care when transporting substances.</li> <li>7. Store used or soiled rags in the metal bin.</li> <li>8. Comply with your duties under the Control of Substances to Health Regulations 2002.</li> <li>9. Wear appropriate PPE at all times when handling chemicals.</li> <li>10. Seek medical attention if exposed to hazardous substances.</li> </ol>	<p><b>Precautions DO NOT:</b></p> <ol style="list-style-type: none"> <li>1. Smoke in the building.</li> <li>2. Smoke near flammable substances.</li> <li>3. Mix substances unless you have authority to do so.</li> <li>4. Leave substances unattended when they have been assigned for a process.</li> <li>5. Decant a chemical into an unmarked container.</li> <li>6. Handle chemicals you are not trained to handle.</li> <li>7. Try to neutralize one chemical with another if a spillage occurs.</li> </ol>

<p><b>Hazards: 7.12</b></p> <p>Forklift Trucks</p>	<p><b>Precautions DO:</b></p> <ol style="list-style-type: none"> <li>1. Only operate the truck if you have been trained to do so.</li> <li>2. Warn employees prior to operating in their vicinity.</li> <li>3. Take extreme care when leaving the truck or operating the truck.</li> <li>4. Take extreme care when the load is raised significantly above ground/floor level.</li> <li>5. Take extreme care when operating on a slope.</li> <li>6. Inspect the truck daily and ensure defects are remedied prior to use.</li> <li>7. Keep loads low and balanced.</li> <li>8. Keep wide loads centered.</li> <li>9. Reverse slowly after unloading, checking over the shoulder regularly.</li> <li>10. Ensure that beacons are used along with audible warnings and seatbelts if fitted.</li> </ol>	<p><b>Precautions DO NOT:</b></p> <ol style="list-style-type: none"> <li>1. Operate the truck unless you have passed the proficiency test and are authorized to do so.</li> <li>2. Leave the truck unattended with the keys in or near the ignition switch.</li> <li>3. Smoke in battery charging areas.</li> <li>4. Carry passengers or lift people.</li> <li>5. Load the truck beyond its rated capacity.</li> <li>6. Carry a load that is too high.</li> <li>7. Raise or lower loads whilst moving.</li> </ol>
<p><b>Hazards: 7.13</b></p> <p>Display Screen Equipment (DSE)</p>	<p><b>Precautions DO:</b></p> <ol style="list-style-type: none"> <li>1. Avoid continual exposure to poor posture, static posture and uncomfortable layout.</li> <li>2. Take time to design your workstation and adjust the height of your chair to a comfortable position.</li> <li>3. Avoid glare.</li> <li>4. Keep the screen clean, using only recommended agents.</li> <li>5. Avoid hot and dry atmospheres.</li> <li>6. Keep food and drink away from the keyboard.</li> <li>7. Ensure you have regular eyesight tests.</li> </ol>	<p><b>Precautions DO NOT:</b></p> <ol style="list-style-type: none"> <li>1. Work at the workstation longer than necessary.</li> <li>2. Hold the same position for longer than necessary.</li> <li>3. Use defective screens, keyboards or other equipment.</li> </ol>

<b>Hazards: 7.14</b>	<b>Precautions DO:</b>	<b>Precautions DO NOT:</b>
Barrel Handling	<ol style="list-style-type: none"> <li>1. Use manual handling aids whenever possible.</li> <li>2. Inspect the Barrel Trailer before use.</li> <li>3. Ensure the Barrel is securely fastened.</li> <li>4. Follow the Barrel Trailer procedure.</li> <li>5. Use the barrel handling equipment provided.</li> <li>6. Ensure two people man-handle a barrel.</li> <li>7. Avoid unnecessary moving of barrels.</li> </ol>	<ol style="list-style-type: none"> <li>1. Try and move a barrel on your own.</li> <li>2. Assume the Barrel Trailer is fit for purpose.</li> <li>3. Load a barrel in the back of delivery vehicles.</li> <li>4. Collect old barrels from customer premises.</li> </ol>

## 8. Appendices

### 8.1 Policy Statement - Health & Safety Training.

The Company acknowledges its duties under the Health and Safety at Work etc. Act 1974, and subsequent regulations to provide Health & Safety Training for all employees. Documents and training modules will be issued where possible solely through the social learning platform.

Appropriate Health & Safety Training will be provided for all employees under the following circumstances:

- Introduction of new work equipment or any change in respect of equipment already in use;
- On the introduction of new technology;
- On the introduction of a new system of work or a change respecting an existing system of work;
- In the correct and safe use of hazardous substances;
- In correct manual handling techniques;
- In the correct use of personal protective equipment;
- Annual Refresher Training in appropriate Risk Assessments & Method Statements
- Regular Toolbox Talks – program to be rolled out Company Wide
- Any other Health & Safety issue deemed necessary by the Company.

### 8.2 Policy Statement – The Provision of Health & Safety Information.

The Company acknowledges its duties under the Health and Safety at Work etc. Act 1974. and subsequent regulations to provide comprehensible and relevant information to employees on the hazards that may arise during their work and the precautions necessary to minimize them.

Health & Safety Information will be provided by the Health & Safety Department to any employee seeking such information. External sources of information include:

- The Health and Safety Executive (HSE)
- Local Environmental Health Departments
- The Royal Society for the Prevention of Accidents (ROSPA)
- The British Safety Council

### 8.3 Policy Statement – Arrangements for Young Persons at Work

The Company acknowledges its duties towards young persons under the Health and Safety at Work etc. Act 1974 and, in particular, the Management of Health and Safety at Work Regulations 1999. Under these Regulations the Company has a responsibility to ensure that young people employed are not exposed to risk due to lack of experience, being unaware of existing or potential risks and/or lack of maturity.

Under the Law, a young person is deemed to be anyone under 18.

The Company will consider the physical and psychological capacity of all young persons employed to carry out their duties, ensuring that they are physically capable of doing so, and are able to understand, remember and follow instructions.

The Company will consider whether the work the young persons will do involves risk of accidents that cannot reasonably be recognized or avoided by young people due to their insufficient attention to safety or lack of experience or training. A young person may be unfamiliar with 'obvious' risks. The Company will ensure that specific Young Person Risk Assessments are conducted and communicated both to the Young Persons and their immediate Supervisors as closer supervision is essential.

#### **8.4 Policy Statement - Consultation with Employees on Matters relating to Health & Safety at Work.**

The Company acknowledges its duties to consult with both trade union-elected safety representatives and/or nontrade union representatives regarding Health & Safety matters relating to work under:

- The Health and Safety at Work etc. Act 1974;
- The Safety Representatives and Safety Committees Regulations 1977;
- The Health and Safety (Consultation with Employees) Regulations 1996;

With a view to the making and maintenance of arrangements which will enable the Company and its employees to co-operate effectively in promoting and developing measures, to ensure the safety and health of employees at work, and in checking the effectiveness of such measures.

Active participation in Monthly Safety Committee meetings are to be encouraged.

#### **8.5 Policy Statement – Personal Protective Equipment (PPE)**

It is a legal requirement under Section 7 of the Health & Safety at Work etc. Act 1974 that employees co-operate with the Company and use PPE provided where required. Where a Risk Assessment identifies a requirement for PPE the Company will ensure that the PPE is suitable, correctly maintained and that the operative is properly trained to use it.

##### **Hard Hats**

These must be worn where there is a risk of injury either from falling materials or from striking the head against protruding objects.

##### **Eye Protection**

To be used wherever there is a risk of contamination from chemicals either by vapour or splashing, or risk from dust or any danger from flying particles. All protection is to be BSEN166.

##### **Hand Protection**

Gloves are provided for the handling of items which may be sharp, rough, hot, cold, contaminated with either chemical or biological agents or liable to cause a hazard by breaking in the hand, e.g. glass. Barrier creams will be provided for use when dealing with mildly irritant substances.

##### **Foot Protection**

Safety footwear is to be worn in all areas where there is a risk of injury to the feet from either materials or equipment crushing the feet, or from materials penetrating the soles of the feet. Safety Footwear must have steel or composite toecaps and midsoles as well as being chemical resistant.

##### **Hi-Visibility Clothing**

MUST be worn by all employees in any areas where vehicles and/or Forklift Trucks operate. This includes inside the Warehouse environment, Goods-In Areas, and Yards.

Drivers are also to wear Hi-Visibility vests when delivering to customer premises.

##### **Other PPE**

Depending on the task, other appropriate PPE is to be worn when required, as identified in the applicable Risk Assessment.

## 8.6 Policy Statement – New and Expectant Mothers

The employer has a duty to conduct Risk Assessments and evaluate hazards specific to new and expectant mothers;

- To ensure the health, safety and wellbeing of all new and expectant mothers in liaison with Managers, Supervisors and any other professionals concerned.
- To provide information and advice to new and expectant mothers with regard to health risks at work.
- To provide advice to Managers, Supervisors with regard to their obligations towards new and expectant mothers at work.

## 8.7 Policy Statement – Accident Investigation

The Company will investigate all accidents and near misses to determine their underlying cause for the purpose of ensuring that there is no recurrence, using the lessons learnt to improve health and safety performance within the Company. The Company adopts a no blame culture when investigating accidents for the purpose of improving health and safety performance.

The type and level of the investigation will be appropriate to the circumstances. Those involved in the accident investigation will be competent to do so and will be provided with adequate training, information and support. The investigation report will provide a factual account of the accident, draw objective conclusions and identify practical recommendations. Agreed actions will be implemented within realistic timescales.

In the event of an external investigation by the enforcement authorities, full cooperation will be provided.

### Investigation Procedure:

Once the area has been made safe the accident should be investigated promptly by the health and safety director/manager, managing director, etc. or by the person that he or she nominates department manager, supervisor, etc.

The decision as to who will investigate the accident will be made after consideration of the type of accident. The competent person conducting the investigation will appoint an investigation team if necessary and obtain specialist advice from technical experts when required. The accident investigation form should be used to record the details of the investigation. The level and type of investigation will depend on the circumstances and severity (or potential severity) of the accident.

The person conducting the investigation will (if necessary):

- Obtain factual information regarding the accident, including the accident location, time and date of the accident, the work activity being undertaken, the people involved and the sequence of events;
- Conduct an inspection of the accident site once the area has been made safe, and take appropriate photographs;
- Obtain written statements from all relevant parties;
- Conduct and document interviews with relevant personnel;
- If relevant, obtain physical evidence (equipment, damaged products, etc.);
- Obtain and review relevant documentation (training, inspection, maintenance records, work procedures, etc.);
- Review existing relevant risk assessments and corresponding arrangements.

Once the facts have been obtained and any required testing, analysis, etc. completed, the underlying causes should be established. The investigation team should draw conclusions and identify practical recommendations to ensure that the accident does not recur.

Assistance should be sought from relevant parties if required. The recommendations must be agreed with the relevant staff and the actions prioritized. The accident investigator (or nominated person) will track the actions to ensure that they are completed within the given timescales.

Relevant risk assessments will be reviewed and, where necessary, updated following the accident report.