



Window & Door Maintenance

## **HEALTH AND SAFETY POLICY**

# CONTENTS

Foreword	3	Office Safety	29
Health and Safety General Policy Statement	4	Lone Working	29
Health and Safety Objectives 2018-19	5	Security	29
Target Performance 2017	6	CCTV	30
<b>PART 1 – RESPONSIBILITY &amp; COMMUNICATION</b>	<b>7</b>	Housekeeping	30
Responsibilities of the Managing Director	7	Workplace Monitoring	30
Responsibilities of the Business Dev. Managers	7	Environmental Policy	31
Responsibilities of the Senior Managers	7	Substances Hazardous to Health	32
Responsibilities of the External H&S Advisor	8	COSHH Precautions	32
Responsibilities of the Office Managers	9	Personal Protective Equipment	33
Responsibilities of Senior Service Engineers	10	Workplace Noise	36
Responsibilities of All Employees	11	Manual Handling Operations	36
Responsibilities of Company Vehicle Drivers	12	Walkways and Passageways	37
Responsibilities of Visitors	12	Workplace Equipment	38
Responsibilities of Contractors	13	Driving for Work	40
Contractor Competency Checks	14	Display Screen Equipment	42
Consultation with Employees	14	Mobile Phones	43
Health and Safety Action Plan	16	Work at Height	43
Performance Review	16	Working at domestic or commercial premises	48
Organisation Structure	17	Permit to Work	49
<b>PART 2 – HEALTH &amp; SAFETY ARRANGEMENTS</b>	<b>18</b>	Non-English Speaking Workers	49
Risk Assessment	18	Asbestos	50
Co-operation and Care	18	Fire Safety and Emergency Procedure	51
Safety Training	19	<b>Glossary of Terms</b>	<b>58</b>
Occupational Health <i>Occupational health surveillance / Alcohol &amp; Drugs / Vibration / Stress</i>	20		
Welfare and Hygiene	22		
Young Persons	23		
New or Expectant Mothers	24		
Disability Awareness	24		
Accident Procedure	24		
RIDDOR	25		
First Aid	27		
Violence in the Workplace	28		

## **FOREWORD**

The business operations of the Company have the potential to harm people whether those people are employees, visitors (including service contractors) or the general public. In recognition of this fact this policy consists of two parts:

PART 1 provides details of the Company's organisational structure for health and safety management, including chain of command, roles and corresponding responsibilities, and delegation of responsibilities. This section also outlines details of its arrangements for consulting employees on workplace safety and provides details of the Company's arrangements for investigating contractor competency.

PART 2 details the Company's practical arrangements for implementing health and safety policy to ensure the protection of all persons (employees, visitors and general public) who may be affected by the Company's business activities.

Employees should not be dismissive of any procedure contained within this Policy that at first glance does not appear to be relevant to them, as some or all of the procedures contained within may become relevant during a particular work activity. Therefore, employees should make frequent reference to the Policy as well as confer with their line manager for clarification of current statutory, as well as Company, requirements.

The overall objective of the Company is that, as far as is reasonably practicable, employees are able to work in a safe environment. To achieve this objective the Managing Director requires the assistance and co-operation of all employees and requests that employees at all times consider the safety, health and welfare of themselves, their work colleagues (in particular new starters and inexperienced workers), contractors, visitors and, when applicable, members of the general public.

In addition, the objective of the Company's Environmental Policy, contained here-in, is to ensure we continually improve our environmental performance. To achieve this objective the Company requires the assistance of all its employees and requests that they always consider working to the benevolence of the environment at all times.

THIS POLICY WILL BE MONITORED AND **REVIEWED EACH JANUARY** TO ENSURE COMPANY PROCEDURES ARE COMPLIANT TO IT. FROM TIME TO TIME THIS POLICY SHALL BE AMENDED TO REFLECT CHANGES TO CURRENT HEALTH AND SAFETY LEGISLATION, OR THE COMPANY'S BUSINESS ACTIVITIES. ALL EMPLOYEES SHALL BE INFORMED IN ADVANCE OF ANY PROPOSALS TO MAKE SUCH CHANGES.

**This Policy is available for any employee wishing to view it. If it is not readily accessible in your department, please ask Sarah Whitaker (swhitaker@milamaintenance.co.uk) or Tina Marsh (tmarsh@milamaintenance.co.uk) for a copy.**

**This Policy reviewed 11 January 2018**

## HEALTH & SAFETY GENERAL POLICY STATEMENT

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**Important: All employees must read this statement and be familiar with the content within.**

It is the policy of Mila Window and Door Maintenance (“the Company”) to comply with its duty of care and obligations under the Health and Safety at Work etc. Act 1974 (as amended), the Management of Health and Safety at Work Regulations 1999 (as amended) and all other supporting legislation concerning safety, health and welfare.

**The Company is committed to:**

- eliminating accidents in the workplace and cases of work-related ill health
- developing a workplace safety culture by maintaining safe and healthy working conditions
- ensuring all persons at work are competent to carry out their work, and they are provided with adequate training, instruction, information and supervision
- providing resources for all preventive and protective measures needed and for putting them in place
- providing the right tools and equipment to do the job and keeping them maintained
- carrying out health surveillance to help identify areas that may be of risk to health or well-being
- encouraging employees to raise concerns about health and safety in the workplace
- co-operating and co-ordinating effectively with all parties the Company is involved with
- ensuring there is suitable and sufficient welfare provision
- protecting the environment from any work activity that may cause it harm or damage
- putting in place safe systems of work to help eliminate or reduce the need for personal protective equipment (PPE)

**The Company’s stated health and safety aims and objectives for the year 2018 are:**

- ▶ To increase health and safety awareness across all areas of the business
- ▶ To implement a range of health and safety awareness campaigns
- ▶ To monitor health and safety performance of contractors
- ▶ To carry out regular site safety inspections
- ▶ To benchmark safety performance against other Group business units
- ▶ To successfully re-register for CHAS accreditation

### Implementation and review

Tristan Cooke (Managing Director) accepts responsibility for health and safety management within the Company and for policy compliance. He shall also seek specialist help or advice from a competent person to assist him as appropriate. The Company’s Health and Safety Policy will be continually monitored and reviewed annually in January. Improvements to the Policy will from time to time be made and the Company positively invites all employees to put forward any suggestions, comments or complaints regarding any part of the Health and Safety Policy, either informally or in writing directly to the Managing Director or designated health and safety officer.

Signed by: Tristan Cooke (Managing Director)

Signature: *T Cooke*

Date: 11 January 2018

Review date: 10 January 2019

## **Health and Safety Objectives 2018-19**

As part of Mila Maintenance's commitment to ensuring the safety and well-being of all persons affected by its business activities, where areas of improvement have been identified by the Company, clear objectives shall be set and an action plan implemented for achieving these goals (see **1-13 Health & Safety Action Plan** below)

Progress with achieving our objectives (agreed annually in January) shall be discussed at Senior Management meetings held during the year.

**1. Benchmark safety performance against other Arran Isle Group business units**

Person(s) responsible: Tristan Cooke and Mark Needham

Timescale: By end-December 2018

**Target:** Improve performance rating year on year

KPI: Increased PDCA performance score (currently at 73%)

**2. Implement a range of health and safety awareness campaigns**

Person(s) responsible: Mark Needham

Timescale: Quarterly / Monitored monthly by Mark Needham

**Target:** Four campaigns annually

KPI: Delivery against plan

**3. Carry out regular site safety inspections**

Person(s) responsible: Chris France (CM North & Midlands), Richard Smith (CM London Responsive), Dean Bradford (CM Installations Nationwide) and Kevin Bowles (Operations Manager South).

Timescale: Monthly / Monitored by Tristan Cooke and Mark Needham

**Target:** Minimum 2 recorded visits by each manager each month / aim 96 annually

KPI: Number of inspections completed

**4. Monitor health and safety performance of contractors**

Person(s) responsible: Tristan Cooke and Mark Needham

Timescale: By end-March 2018 for current contractors / Monitored monthly by Mark Needham

**Target:** 100% vetting compliance

KPI: Number of proficiency questionnaires returned and passed

**5. Increase employee awareness of health and safety issues**

Person(s) responsible: Chris France (CM North & Midlands), Richard Smith (CM London Responsive), Dean Bradford (CM Installations Nationwide) and Kevin Bowles (Operations Manager South).

Timescale: Monthly / Monitored by Tristan Cooke and Mark Needham

**Targets:** 1. 100% of quarterly Team Briefing agendas listing health and safety as a discussion topic

2. A minimum of two health and safety-themed toolbox talks taken by each manager during the year

KPI: Target #1 – percentage achieved; Target #2 – Number of toolbox talk sign-off sheets returned to office

**6. Re-register for CHAS accreditation**

Person(s) responsible: Tristan Cooke and Mark Needham

Timescale: October 2018

**Target:** 100% success

KPI: Pass on first submission of application

## Target Performance 2017

### Health and safety objectives set year 2017-18:

#### **1. Benchmark safety performance against other Arran Isle Group business units**

Person(s) responsible: Tristan Cooke and Mark Needham

Timescale: By November 2017

**Target:** Improve performance rating year on year

KPI: Increased PDCA performance score (currently at 67%)

**Actual: PDCA performance score self-assessed in January 2018 at an increased score of 73%.  
(TARGET ACHIEVED)**



#### **2. Implement a range of health and safety awareness campaigns**

Person(s) responsible: Mark Needham

Timescale: Quarterly / Monitored monthly by Mark Needham

**Target:** Four campaigns annually

KPI: Delivery against plan

**Actual: Campaigns successfully carried out in January, April, August and November  
(TARGET ACHIEVED)**



#### **3. Carry out regular site inspections**

Person(s) responsible: Chris France (CM North & Midlands), Richard Smith & Dean Bradford (CMs Installations Nationwide), Roland Trueman (CM London & South), Scott Bailey & Radu Costea (Contracts Administrators)

Timescale: Monthly / Monitored by Chris France and Roland Trueman

**Target:** Minimum 1 recorded visit by each manager every month / aim 60 annually

KPI: Number of inspections completed

**Actual: Insufficient number of completed MM20 forms logged  
(TARGET NOT ACHIEVED)**



#### **4. Monitor health and safety performance of contractors**

Person(s) responsible: Tristan Cooke and Mark Needham

Timescale: By end-March 2017 for current contractors / Monitored monthly by Mark Needham

**Target:** 100% vetting compliance

KPI: Number of proficiency questionnaires returned and passed

**Actual: Not all contractors had a vetting form processed  
(TARGET NOT ACHIEVED)**



#### **5. Re-register for CHAS accreditation**

Person(s) responsible: Tristan Cooke and Mark Needham

Timescale: October 2017

**Target:** 100% success

KPI: Pass on first submission of application

**Actual: CHAS certificate issued within three days of submission  
(TARGET ACHIEVED)**



## **PART 1 – RESPONSIBILITY AND COMMUNICATION**

### **1-1 Responsibilities of the Managing Director (Tristan Cooke)**

Mr Tristan Cooke is responsible for the health, safety and welfare for all Company employees, as well as visitors to Company premises and all other persons who may be affected by Mila Maintenance's business activities. He is also responsible for all environmental matters within the Company.

His key health and safety responsibilities are to:

- Provide adequate resources to meet the requirements of this Policy.
- Ensure all levels of management and employees understand the requirements placed upon them by this Policy.
- Set health and safety objectives and arrange for their review and audit.
- Monitor and review the Company's health and safety management system.
- Ensure management team receive adequate and appropriate training so they are competent to do their work and disseminate culture and ethos
- Implement a system to engage and consult with employees on health and safety conditions and which addresses their concerns.
- Provide safe and healthy working conditions.
- Ensure the relevant legislation is complied with in all the Company's areas of operation.
- Ensure all accidents and incidents are correctly reported and recorded and action taken to prevent recurrence.
- Ensure that competent health and safety advice and assistance is available.

### **1-2 Responsibilities of the Business Development Managers (Will Chan and Rick Awdas)**

The Business Development Manager's key health and safety responsibilities are to ensure that:

- They understand the Company's Health and Safety Policy for the prevention of injury and ill-health and allocated responsibilities.
- They understand their individual role in providing health and safety leadership within the Company.
- They understand their role in engaging the active participation of employees in improving health and safety.
- Relevant legislation is complied with throughout the business. They attend meetings with all other persons connected with any project to ensure compliance with project requirements, any prohibitions, and health and safety are met, and to help arrange relevant timescales.
- All safety, health and environmental issues are discussed openly with prospective clients or any legitimate person requesting such information.
- They set a good example by helping to develop a workplace culture of accident prevention and health and safety awareness.

### **1-3 Responsibilities of the Contracts Managers, Operations Manager and Technical Contract Support Administrator (Chris France, Richard Smith, Dean Bradford, Kevin Bowles, Roland Trueman)**

The senior managers' key health and safety responsibilities are to ensure that:

- They understand the Company's Health and Safety Policy for the prevention of injury and ill-health and allocated responsibilities.
- They understand their role in engaging the active participation of those persons under their control in improving health and safety.

- They cooperate with the Managing Director on all matters of health, safety and welfare.
- They help develop and administer procedures to ensure compliance with health and safety across the Company.
- Health and safety activities are co-ordinated between all persons working at the same site.
- All persons are, as far as reasonably practicable, protected from harm and injury caused by the Company's work activities.
- All employees and visitors are made aware of the risks from the hazards they could be exposed to and the control measures in place to ensure their safety.
- All employees under their supervision receive adequate and appropriate training in their tasks.
- Employees working at locations under control of other employers are provided with relevant health & safety information and, where required, adequate training.
- Employees work in accordance with their safety training and do not take any unnecessary risks.
- All accidents, incidents and 'near misses' are correctly reported and recorded, and an investigation carried out when required.
- When applicable, a copy of the contractor's health and safety policy and relevant risk assessment/method statement (RAMS) is obtained prior to any work being carried out.
- Site safety inspections are carried out on a regular basis and clearly recorded.
- When applicable, Permits to Work are completed, agreed upon and signed.
- Safer alternatives (such as for a work process, material, substance, equipment etc.) are implemented or obtained when reasonably practicable.
- Relevant written safe operating procedures, safety instructions, operating manuals and safety data sheets are easily accessible for employees' reference.
- There is regular communication with all employees under their supervision to inform them of matters concerning health and safety, including risk assessment findings and environmental issues.
- All plant and equipment is regularly inspected, tested, serviced and properly maintained. All new equipment is inspected for defects or flaws on receipt.
- Company vehicles are inspected and serviced at appropriate intervals and thoroughly examined by a competent person at least every 12 months or at intervals set by the competent person.
- Disciplinary action is taken against any employee who does not comply with the requirements of the Company's Health and Safety Policy.
- They set a good example by helping to develop a workplace culture of accident prevention and health and safety awareness.

#### **1-4 Responsibilities of the External Health & Safety Advisor (Mark Needham)**

Mark Needham's key health and safety responsibilities are to ensure that:

- He understands the Company's Health and Safety Policy for the prevention of injury and ill-health and allocated responsibilities.
- He assists the Managing Director in the implementation of health and safety policy and workplace procedure, and in complying with all relevant legislation.
- He understands his role in engaging the active participation of employees in improving health and safety.
- He provides accurate and straightforward health and safety advice to staff and others on request
- Procedures are put in place to ensure the Company's Health and Safety Policy is effectively administered, monitored and reviewed, and alterations made which reflect changes in legislation or Company development.
- He assists the Managing Director with the development of the health and safety management system.

- Risk assessments are reviewed on a regular basis or when an assessment is considered no longer valid, such as in the event of an accident, or whenever there is a significant change in the work to which the assessment relates.
- Arrangements are in place to ensure health and safety objectives are set for the coming period.
- Arrangements are in place to ensure employees are informed of any changes in health and safety legislation or Company health and safety policy.
- He sets a good example by helping to develop a workplace culture of accident prevention and health and safety awareness.

Mark Needham will also provide the Managing Director with support and advice so that he can ensure:

- Arrangements are in place for the organizing and delivery of a variety of training courses to managers and staff within the organization.
- Arrangements are in place to ensure all levels of management and employees understand the requirements placed upon them by this Policy.
- Arrangements are in place to ensure health and safety is an agenda item at all management meetings.
- Arrangements are in place to ensure all relevant written safe operating procedures, safety instructions, operating manuals and safety data sheets are easily accessible for employees' reference.
- Arrangements are in place to ensure there is regular communication with all employees to inform them of matters concerning health and safety, including risk assessment findings and environmental issues.
- Arrangements are in place to ensure any significant accident, disease or dangerous occurrences are reported to the enforcing authority.
- Arrangements are in place to ensure any action as identified by accident investigation findings to prevent a recurrence is implemented.
- Arrangements are in place to ensure further control measures required as identified in the assessments are implemented.
- Arrangements are in place to ensure practice fire drill is carried out in accordance with risk assessment recommendations.
- Arrangements are in place to ensure relevant health and safety information is placed on notice boards.
- Arrangements are in place to ensure the Health & Safety Law poster is clearly displayed.

#### **1-5 Responsibilities of Office Managers (Sarah Whitaker and Tina Marsh)**

The Office Manager's key health and safety responsibilities are to ensure that:

- They understand the Company's Health and Safety Policy for the prevention of injury and ill-health and allocated responsibilities.
- They understand their role in engaging the active participation of other office employees in improving health and safety.
- They help develop and administer procedures to ensure compliance with health and safety across the Company.
- They co-operate with the Managing Director on matters of office safety.
- Records of statutory inspections are filed for reference.
- Systems of auditing, monitoring and recording are maintained.
- First aid facilities are available at all times and there are a sufficient number of trained first-aiders and fire wardens on the premises during occupation.
- Safety training records are accurately recorded and monitored.
- A copy of the contractor's health and safety policy and relevant risk assessment/method statement (RAMS) is obtained prior to any work being carried out at the Barnsley Unit, Folkestone Office or Ashford Depot sites.

- There is regular inspection, testing and recording of the fire alarm and emergency lighting systems.
- Office evacuation procedure is implemented during an emergency.
- Roll call is taken at the emergency assembly point after evacuation.
- Office equipment is kept in good working order.
- Correct personal protective equipment is issued.
- Relevant health and safety information is up to date and filed.
- A high standard of housekeeping is maintained.
- They set a good example by helping to develop a workplace culture of accident prevention and health and safety awareness.

### **1-6 Responsibilities of Senior Service Engineers**

The Senior Service Engineers' key health and safety responsibilities are to ensure that:

- They understand the Company's Health and Safety Policy for the prevention of injury and ill-health and allocated responsibilities.
- They understand their role in engaging the active participation of engineers in improving health and safety.
- They cooperate with senior managers on all matters of health, safety and welfare.
- Health and safety activities are co-ordinated between all persons working at the same site.
- Young workers, new starters and trainees, or those new to a work process or procedure are properly supervised until they have attained a level of competency and experience which allows them to work unsupervised.
- There is adequate protection of engineers, property occupants and visitors, and the general public from any harm caused by work activity.
- All engineers under their supervision, property occupants and visitors are made aware of the risks from the hazards they could be exposed to and the control measures in place to protect them from harm.
- Engineers under their supervision work safely in accordance with their training and do not take any unnecessary risks.
- All hazardous materials brought on site are correctly marked, stored, handled and used.
- The Contracts Manager or Operations Manager is informed of any engineer requiring further training relevant to the work they will be carrying out.
- There is appropriate means of protection in place prior to work starting.
- All accidents, incidents and 'near misses' are correctly reported and recorded.
- Work areas remain well-lit and ventilated, and have floors which are level, non-slip and kept free from obstruction.
- There is provision of adequate personal protective equipment relevant to a work process or procedure that is undertaken, assuming PPE is used only when a risk to health and safety cannot be adequately controlled by other means, and that such PPE is used or worn as intended.
- When applicable, there is provision of clear safety signs and relevant hazard warning markings.
- There is provision of adequate welfare and first aid facilities for those persons under their supervision.
- Cleanliness, tidiness and all that contributes to 'good housekeeping' is of an acceptable standard.
- They set a good example by helping to develop a workplace culture of accident prevention and health and safety awareness.

### **1-7 Responsibilities of All Employees (Managers, Senior Service Engineers, Office Personnel and Engineers)**

It is the duty of each employee to take reasonable care of the health and safety of themselves, work colleagues and other persons who may be affected by their actions at work.

The Health and Safety at Work Act 1974 underlines this duty and:

- Places responsibility on an employee to co-operate with their employer and others in meeting statutory requirements
- Places responsibility on all persons to not misuse anything provided for safeguarding health and safety at work.
- Defines penalties for any person who fails to carry out these duties.

Health and safety awareness consists of:

- Reporting potential hazards.
- Observing safety rules, procedures and codes of practice.
- Using with all reasonable care, tools, safety equipment and protective clothing provided by the Company.
- Participating in safety training courses when necessary.
- Taking an active and personal interest in promoting health and safety at work.

All employees, irrespective of status, therefore have a personal responsibility with regard to health and safety. Their key health and safety responsibilities are to ensure that they:

- Understand the Company's Health and Safety Policy for the prevention of injury and ill-health, the standards and procedures contained within, and allocated responsibilities.
- Fully co-operate with instructions concerning safety and welfare in the workplace.
- Understand and comply with safe systems of work and the safety rules which apply to their work.
- Work with due care and attention at all times.
- Report any hazards to health and safety, and warn others of their whereabouts.
- Report all accidents, incidents and 'near misses' immediately.
- Do not operate plant, tools, equipment or Company vehicle unless adequately trained, experienced and authorised to do so.
- Only use the correct tools and equipment for the task and which are in good condition.
- Report immediately any defects in plant, tools or equipment.
- Do not override safety guards, barriers or controls fitted to equipment.
- Use any personal protective equipment provided.
- Use designated pedestrian walkways.
- Follow emergency evacuation procedure in accordance with Company policy.
- Do not engage in 'horseplay' or activity that may put themselves and others at risk of injury.
- Do not abuse or damage welfare facilities.
- Keep the work area clean and tidy, and free from any obvious hazard.
- Dispose of any waste safely and to the benevolence of the environment.
- Raise any concerns with health and safety to their line manager.

In addition, engineers specifically shall:

- Prior to starting any work at a customer's property, carry out a risk assessment in accordance with their training and record their findings on a '*Job Information Document*'.
- Keep first-aid travel kits adequately stocked and fully replenished.

## 1-8 Responsibilities of Company Vehicle Drivers

The drivers' key health and safety responsibilities are to ensure that:

- They understand the Company's Health and Safety Policy for the prevention of injury and ill-health, the standards and procedures contained within, and allocated responsibilities.
- They are adequately trained, qualified and authorised to drive the vehicle they are using.
- They are medically and mentally fit to operate the vehicle.
- Daily checks are carried out on their vehicle to ensure they are safe to drive.
- All defects and damage are reported immediately.
- The vehicle has been inspected and serviced at appropriate intervals and thoroughly examined by a competent person at least every 12 months or at intervals set by the competent person.
- There is compliance with all DVLA, MOT and driver insurance requirements.
- National speed limits are not exceeded.
- Warning signs and site traffic rules are always obeyed.
- All accidents, incidents and 'near misses' are reported immediately.
- The vehicle's load capacity is not exceeded.
- Existing protective devices are not removed or overridden.
- Only the fuels specified in the operating instructions' manual are used.
- Mobile phones are only used in conjunction with a 'hands free' operating system.
- When required, correct manual handling techniques are used.
- No smoking is allowed inside the vehicle at any time.

## 1-9 Responsibilities of Visitors

As part of Mila Maintenance's commitment to safeguarding all persons whilst on its premises from injury or harm, employees receiving visitors must ensure these persons enter through 'Reception' and register upon arrival using the *Visitors Log* as well as sign out upon their departure. At Reception, the visitor will then be made familiar with evacuation procedure and means of escape in the event of an emergency.

An appointed person (*Mila contact*) will accompany visitors at all times, unless the visitor is working long term on maintenance, repair or servicing. In these circumstances, the appointed person shall allow the visitor to work unaccompanied but will make regular checks on their personal safety.

Key health and safety responsibilities for visitors are:

- All visitors will be expected to comply with the Company's Health & Safety Policy during their stay.
- All visitors will be expected to comply with any instruction (including verbal instruction, notices and information signage) regarding their safety and welfare whilst on Company premises.
- On arrival at Barnsley Unit, Folkestone Office or Ashford Depot, all visitors must sign in at Reception and sign out upon leaving the premises.
- Whenever visitors need to walk through Company premises, they shall be issued with any appropriate personal protective equipment which they **MUST** wear as instructed.
- Visitors are **STRICTLY FORBIDDEN** to wander the premises unattended or enter any restricted area unless authorised to do so.
- Any injury sustained by, or damage to Company property, plant or equipment caused by a visitor must be reported immediately to a first-aider and their Mila contact.
- All visitors will have the use of the Company first aid facilities as appropriate.
- Visitors are required to keep Company premises tidy and clear of debris, waste or obstruction at all times.
- Visitors are **STRICTLY FORBIDDEN** to consume or bring on to Company premises any intoxicating alcoholic liquor or drugs at any time.

- Visitors are STRICTLY FORBIDDEN to enter or work at Company premises if medically unfit to do so or whilst under the influence of alcohol, drugs or medicines, nor are they allowed to permit anyone who is accompanying them to consume or bring on to Company premises any intoxicating alcoholic liquor or drugs at any time.
- It shall be the visitor's responsibility to ensure his or her vehicle is parked in a safe and secure manner whilst visiting the Company's premises.

### **1-10 Responsibilities of Contractors**

- It is the responsibility of the contractor to be aware of and to comply with their obligations under the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999 (as amended), current CDM Regulations and other supporting legislation concerning health and safety relevant to their work activity.
- All contract workers will be expected to comply with the Company's Health & Safety Policy and must ensure that their own company policy is made available for the duration of the work being carried out.
- All contract workers will be provided with a copy of the Company Health & Safety Policy upon request.
- All contract workers are to provide evidence (including proof of payment to demonstrate validity) of a minimum of £5 million insurance cover for the duration of any contract. This evidence must also be produced for any other contractor required to fulfil the contracted work. Copies of any insurance documentation shall be kept on file at the Barnsley Unit.
- All work must be carried out in accordance with the relevant statutory provisions and take into account the safety of others on the premises as well as members of the general public.
- Any work at height equipment or means of protection must be inspected by a competent person appointed to ensure that it is erected and maintained in accordance with health and safety regulations and Codes of Practice. Contractors must provide the relevant manager with a copy of an up to date Certificate of Thorough Examination and valid maintenance report for any crane operated.
- Contract workers shall not alter any work at height equipment or means of protection unless adequately trained and qualified, and authorised to do so.
- All plant or equipment brought on to Company premises or site by contract workers must be safe and in good working condition, fitted with any necessary guards and safety devices, and supplied with up to date certificates made available for inspection.
- No vehicle belonging to the contract worker is allowed onto the Company's premises until permission has been granted by the relevant manager.
- All transformers, generators, extension leads, plugs and sockets must be to latest British Standards for industrial use, and in good repair. All portable electrical appliances must be tested, identified and recorded in a register, which must be available for inspection at any given time.
- Contract workers are required to bring to the attention of the relevant manager any hazard spotted.
- Contract workers are required to report all accidents and incidents immediately (or as soon as possible) to a first-aider and relevant manager.
- Any injury sustained or damage caused by contract workers must be reported immediately (or as soon as possible) to a first-aider and relevant manager.
- Contract workers must comply with any safety instructions given by the relevant manager and co-operate with any instructions concerning safety in the workplace.
- Contract workers informed of any hazards or defects noted during inspections or as work is being carried out will be expected to take immediate remedial action, but only if adequately trained, qualified and experienced to do so.
- Contract workers will provide the Company with the name of the person they have appointed as their safety supervisor.
- No material or substance which has health, fire or explosion risks is permitted to be brought onto Company premises unless permission has been granted beforehand by the relevant manager.

- Any material or substance brought onto Company premises or site, which has health, fire or explosion risks must be used and stored in accordance with safety, health and environmental legislation and any relevant instruction and safety information must be provided all persons who may be affected.
- Contract workers are required to keep all work areas tidy and clear of debris and waste materials etc. and ensure that all spillages are cleared as soon as possible.
- Contract workers are STRICTLY FORBIDDEN to enter or work at any Company premises or work site if medically unfit to do so or whilst under the influence of alcohol, drugs or medicines, nor are they allowed to permit anyone who is accompanying them to consume or bring on to Company premises or work site any intoxicating alcoholic liquor or drugs at any time.
- Contract workers shall not permit any third party to be present on Company or customer premises/site if such person is judged to be under the influence of any intoxicating liquor or drugs.
- Contract workers are required to take any suggestions, complaints or constructive criticisms to the relevant manager.

NOTE: Individual responsibilities for fire safety are listed below in **2-35-2 Fire Safety Responsibility**.

### **1-11 Contractor Competency Check**

The following arrangement is in place for assessing the competency of any contractor or consultant the Company wishes to procure the services of:

1. Any potential service-providing contractor must complete a Contractor Proficiency Questionnaire issued it by the Company.
2. The submitted questionnaire will be examined to determine if responses have met the Company's required standard.
3. Contact will be made with the contractor to clarify any response
4. The contractor will be visited at their premises or subsequently invited for interview
5. Award contract subject to terms and conditions

A proficiency review shall be carried out annually to ensure compliance with our selection criteria as well as with our group insurance conditions.

### **1-12 Consultation with Employees**

#### **1-12-1 General**

The Company shall always comply with the Health and Safety (Consultation with Employees) Regulations 1996 (as amended) whereby Mila Maintenance will ensure that employees are regularly informed of the introduction of any substantial measures that help safeguard against injury and ill-health in the workplace, including:

- Planning and organising health and safety training
- Appointment of nominated persons for co-ordinating emergency procedures and safety assistance, and persons elected to represent employee safety
- Any health and safety consequences caused by the introduction into the workplace of new equipment, new technology or a different work process
- Information the Company is required to provide employees under health and safety law
- Any amendment to Company health and safety policy

Management meetings shall take place on a monthly basis, providing a forum for identifying safety, health and environmental issues (including the review of inspection and hazard report forms) whereby new objectives can be set.

The Managing Director shall always consult the Company's health and safety management team whenever there is a change in a process or procedure, or introduction of new equipment or technology, in the event of an accident or near-miss, and whenever health and safety affects employees. When considered applicable, employees shall be informed of all relevant findings.

The Company encourages its employees to help solve health and safety problems. To this extent, any employee who raises an issue will be personally informed of any actions taken as a result of their input.

### **1-12-2 Team Briefings**

Team briefings will be held quarterly each year, and shall be attended by:

- Representative of the Senior Management Team
- Senior Service Engineers
- Employees

There shall be at least one Contracts Manager or Operations Manager present during Team Briefings involving engineers. The functions of Team Briefings are to:

- (i) Encourage the participation of all employees in the promotion of safe working environments.
- (ii) Achieve and maintain safe working conditions.
- (iii) Assist in the carrying out of safety/hazard analysis.
- (iv) Give recommendations for further action on results of accident statistics.
- (v) Consider any complaints or suggestions from employees.
- (vi) Consider any matter relating to loss prevention.

A list of scheduled meetings is available upon request.

### **1-12-3 Toolbox Talks**

A toolbox talk will take place prior to any project work commencing to discuss with all relevant personnel site safety requirements and any significant findings as a result of risk assessments being completed. All persons involved shall therefore be informed of the risks from the hazards they could be exposed to, and the measures in place to protect them from those hazards.

Themed toolbox talks will also be held on a regular basis as a means of providing employees information and refresher instruction specific to a health, safety or environmental training subject. These toolbox talks will be led by Mark Needham.

### **1-12-4 Safety Meetings**

Safety meetings chaired by Tristan Cooke are incorporated within the agenda of the Company's Management Meeting, held throughout the year. These meetings shall (when possible) be attended by:

- Managing Director (Chair)
- Business Development Manager(s)
- Contracts Manager(s)/Operations Manager
- Office Manager
- External health and safety advisor

The aim of each safety meeting is to: -

- a) bring any issues regarding workplace safety or ill-health to the attention of the senior management team in a formal procedure in order to address any remedial action required;
- b) discuss the nature of any accidents within the workplace, analysing causation and agreeing any control measures required to eliminate further occurrence; and
- c) discuss health and safety objectives.

### **1-13 Health & Safety Action Plan**

As part of the Company's commitment to ensuring the safety of all persons affected by its business activities, where areas of improvement have been identified during management meetings clear objectives shall be set whereupon key employees will be made responsible for the implementation of specific goals within predetermined timescales.

These objectives shall be reviewed on a regular basis.

### **1-14 Performance Review**

A formal review of health and safety performance shall be carried out annually. This allows senior management to establish whether the essential health and safety principles – strong and active leadership, worker involvement, and assessment and review – have been embedded across the business and whether our system is effective in managing risk and protecting people.

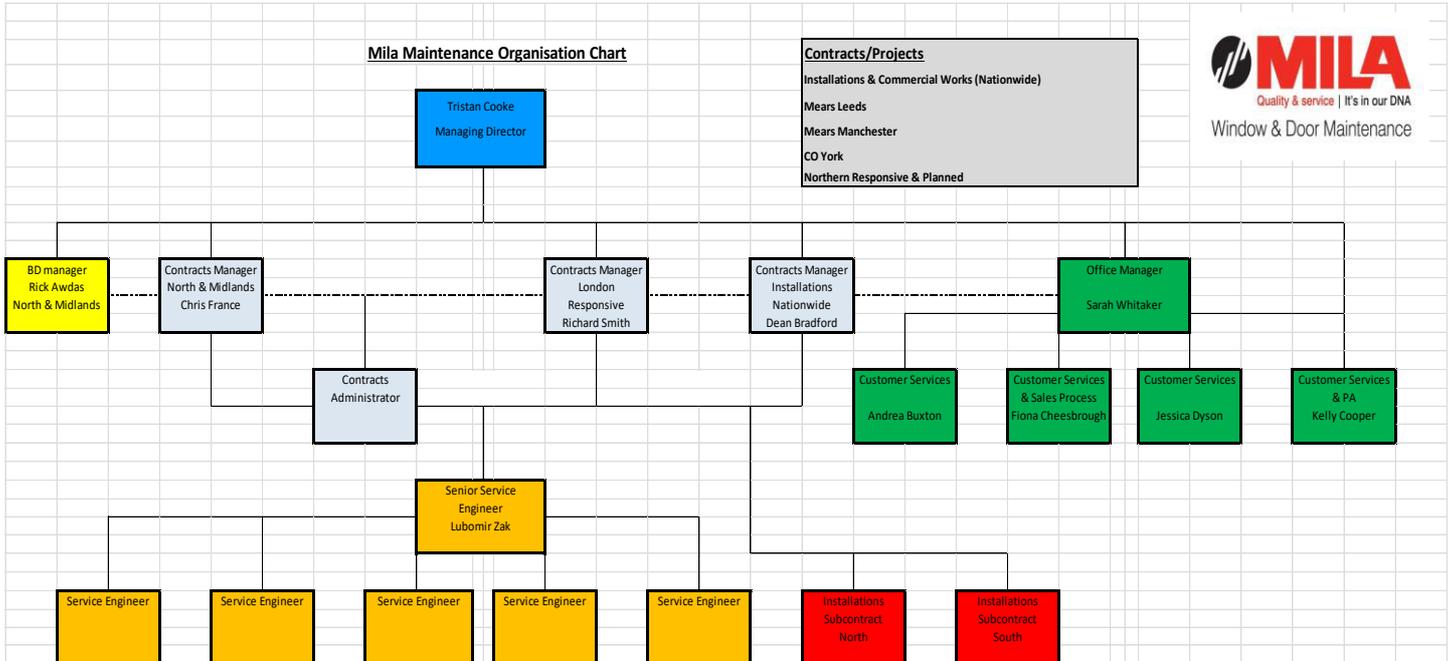
The review process shall:

- examine whether health and safety policy reflects our current priorities, plans and targets
- examine whether the Company's risk management system is effective
- identify health and safety shortcomings, and the effect of all relevant management decisions
- decide actions for addressing any weaknesses and a system to monitor their implementation

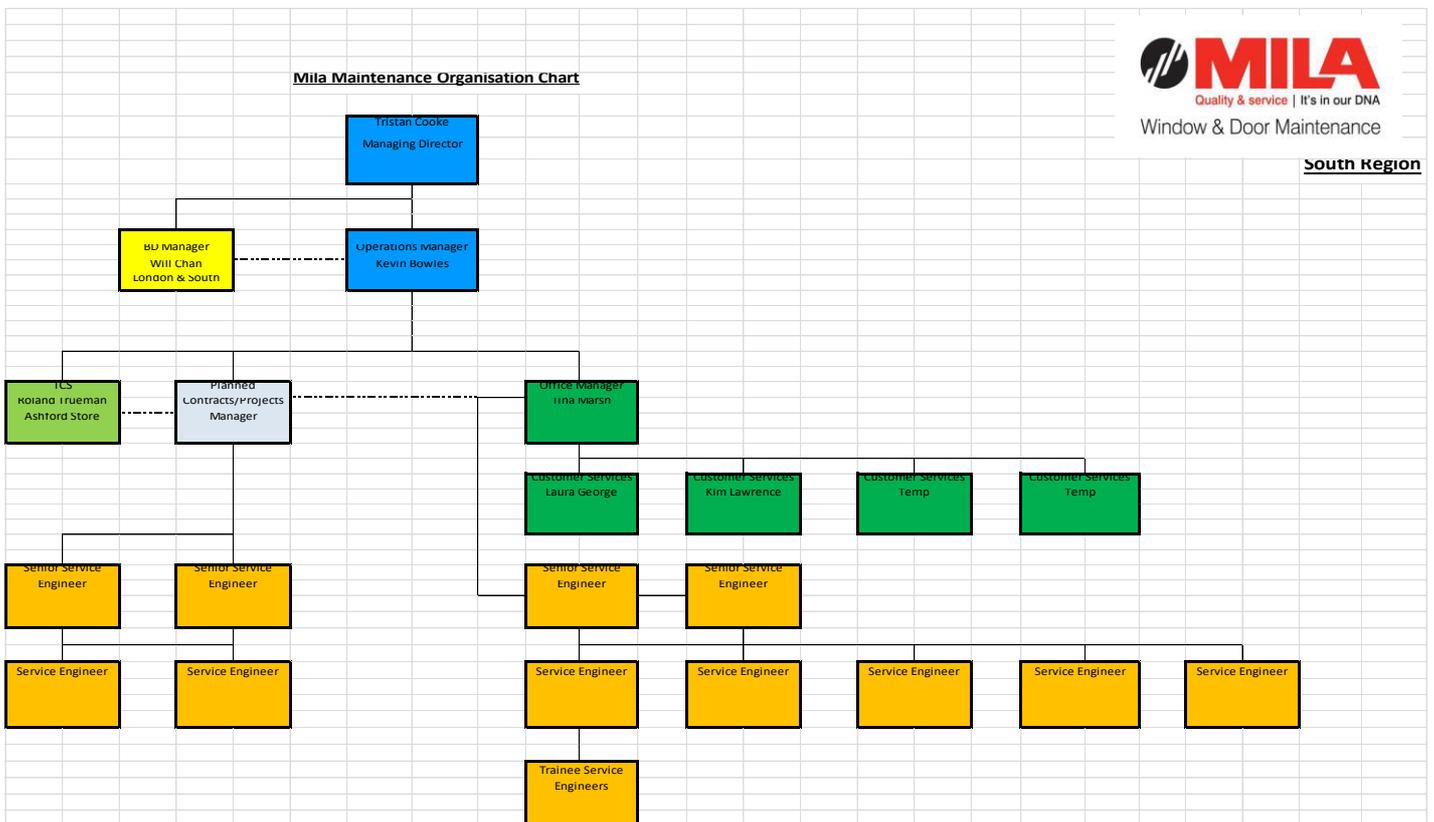
Part of this process will also include a review of accident statistics, and analysis of the annual Maintenance Sickness File sent from Daventry at the start of the year

# Organisation Structure

## Mila Maintenance – North & Midlands / London Responsive / Nationwide Installations



## Mila Maintenance – South Region



## **PART 2 – HEALTH AND SAFETY ARRANGEMENTS**

### **2-1 Risk Assessment**

#### **2-1-1 General**

The Company recognises that under Regulation 3 of the Management of Health and Safety at Work Regulations 1999 (as amended) it has a duty to make a suitable and sufficient assessment of the risks to the health and safety of our employees and other persons affected by our actions. While health and safety law does not expect the Company to eliminate all risk, it is nonetheless required to protect people as far as is reasonably practicable.

A risk assessment is simply a careful examination of what, in our work, could cause harm to people, so that we can weigh up whether we have taken enough precautions or should do more to prevent harm. To this extent, the Company shall carry out risk assessment in accordance with the following guidelines as provided by the Health and Safety Executive (HSE):

- Step 1  
Identify the hazards
- Step 2  
Decide who might be harmed and how
- Step 3  
Evaluate the risks and decide on precautions
- Step 4  
Record all significant findings and implement them
- Step 5  
Review the assessment and update if necessary

The Company shall implement any control measures required of it as identified by risk assessment to comply with health and safety requirements. The risk assessment process will always be carried out internally by a senior manager or Mark Needham.

#### **2-1-2 Risk Assessment on Domestic Premises**

Engineers are required to complete dynamic risk assessment procedure before any works start at domestic premises and their findings recorded on the *MM14 Job Information & Works Report* document. Engineers must ensure this document is returned to Barnsley Unit or Folkestone Office at the end of each week for inspection by management.

### **2-2 Co-operation & Care**

Employees are expected to co-operate with Mark Needham in his role as the Company's external Health & Safety Advisor, as well as any other person authorised by the Company to carry out duties associated with maintaining the safety and well-being of its employees and visitors, and the general public.

Employees are further required to abide by their decisions and duties under this Policy.

Disciplinary action may be taken against any employee who violates safety rules or who fails to perform his or her duties in accordance with this Policy.

## **2-3 Safety Training**

### **2-3-1 Legal requirements**

There is increasing legislative emphasis on the competence of employees at all levels to undertake work tasks. Competence is about being able to do something effectively and efficiently. It is brought about by knowledge, skills and experience. Furthermore, the Health and Safety at Work etc. Act 1974 places a legal duty on the Company to ensure that staff at all levels are competent to undertake their duties.

Mila Maintenance recognises that safety training is essential for the protection of its employees and persons affected by the Company's business activities. All employees will therefore receive training appropriate to the job they are required to do, which will be supported by adequate and sufficient information and instruction. This enables the Company to:

- ensure employees are capable of undertaking their work duties safely in accordance with Company policy and health and safety law;
- reduce the risk of injury and ill-health within the workplace;
- maintain a safe working environment for everyone;
- develop a pro-active culture of workplace health and safety awareness;
- achieve its health and safety objectives; and
- meet the Company's legal duty of care to protect the health and safety of our employees, visitors, contractors and other persons who may be affected by the Company's business activities.

### **2-3-2 General**

Training is a significant element of the Company's safety management system. In particular, health and safety training produces higher levels of safety awareness which can result in reducing instances of accidents and 'near misses'.

It is our policy that all new employees shall undergo health and safety induction on the first day of their employment with the Company when they will learn basic procedures such as fire alert, emergency evacuation, accident reporting, location of first-aid stations, safe use of pedestrian routes etc. All subsequent training and development requirements for new starters will be identified by their line manager or trainer, and a coaching programme implemented. Trainees MUST be supervised at all times until they are considered competent to continue working unsupervised.

Line managers will identify the training and development needs for each employee they are responsible for. The level and type of training required will vary dependent on the individual's job role and level of responsibility. Recorded training sessions will be held as often as is deemed necessary.

In addition to general health and safety training, specialist post holders may also need detailed training relating to specific hazards and their associated control measures. All engineers are required to take part in a one day emergency first aid at work (EFAW) course.

Other situations where training and development may need to be revised include when:

- a person is transferred or promoted to a new post;
- there may be significant changes to the working environment;
- there may be significant changes to the work activity, or the work equipment;
- the technology changes;
- people may be exposed to new or increased risks;
- existing knowledge and skills may need updating;
- it is required as a result of a health and safety audit; and
- there has been an accident, incident or near-miss.

In all cases, health and safety training requirements shall be reviewed on a regular basis. Employees are positively encouraged to raise any concerns or issues regarding health and safety training with their line manager at any time.

## **2-4 Occupational Health**

### **2-4-1 Health surveillance**

Mila Maintenance will, from time to time, consider using assistance from competent persons such as an occupational health nurse, doctor or health specialist to monitor the health and well-being of our employees. To this extent, tests may include diagnostic audiology, pulmonary function assessment, manual handling surveillance, hand-arm vibration assessment etc. Employees are required, therefore, to fully co-operate with all relevant persons involved with any health screening or surveillance carried out on behalf of the Company.

Our safety management system also helps ensure any potential exposure to health risk is eliminated or reduced to the lowest factor. Nonetheless, the Company has implemented a programme of periodic lower-level health surveillance to monitor any risk to employees. Action for lower-level health surveillance shall include one or all of the following:

- An in-house questionnaire, overseen by a trained 'responsible person'  
There are separate questionnaires for:
  - ◆ Breathing disorders
  - ◆ Exposure to noise
  - ◆ Dermatitis
  - ◆ Exposure to vibrationInformation provided by employees allows the Company to identify any areas that may be of risk to their health and well-being whilst at work whereby any ill health effects are detected as early as possible.
- Informing employees of likely exposures and symptoms to watch out for
- Informing employees about how (and whom) to report such symptoms if they occur

*Note: In accordance with Health and safety Executive (HSE) guidelines, blanket coverage of the health surveillance programme for all employees is avoided as it can provide misleading results.*

Employees are also requested to make self-checks on a regular basis for signs of any work-related medical condition, such as contact dermatitis or occupational asthma, and to report their findings immediately to their line manager. Any employee found to have developed any work-related medical condition shall be immediately referred to their GP or Company occupational health specialist for advice.

### **2-4-2 Alcohol and Drugs**

It is Company policy that employees must NOT undertake any work duty (including driving) while under the influence of drugs or alcohol, or while taking a course of medicine, that might impair their judgement.

Employees are STRICTLY FORBIDDEN to consume or bring on to Company premises or place of work (such as a domestic property where Company work is being undertaken) or within a Company vehicle any intoxicating alcoholic liquor or drugs at any time.

Whether a person is fit for work will be subject to any reasonable opinion of management.

### **2-4-3 Vibration**

Hand-arm vibration (HAV) is vibration transmitted from work processes into workers' hands and arms whereby regular and frequent exposure to high levels of vibration can lead to permanent injury. This is most likely when contact with a vibrating tool or process is a regular part of a person's job.

While occasional exposure is unlikely to cause injury, the Company has nonetheless implemented a programme of pre-exposure and periodic health surveillance (as mentioned above) in accordance with regulation 7 of the Control of Vibration at Work Regulations 2005 (as amended). The information provided by employees on any questionnaire issued will allow the Company to identify any areas that may be of risk to their health and well-being whilst at work. In some cases further advice may be required from an occupational health professional.

To control the risk the Company shall:

- Look for alternative ways of working which eliminate vibrating equipment altogether.
- Always consider purchasing alternative equipment which eliminates or reduces exposure to vibration when looking to acquire new or replacement equipment.
- Ensure all power tools are suitable for the purpose for which it is provided.
- Maintain all equipment in an efficient state and working order, and in good repair.
- Minimise the time individuals use the equipment, as well as break up periods of continuous equipment use.

For their part, employees are required to make a visible safety inspection of power tools prior to use, and that bits and drills are kept sharp to prevent exposure to hand-arm vibration.

### **2-4-4 Stress policy**

Mila Maintenance is committed to protecting the health, safety and welfare of our employees. We recognise that workplace stress is a health and safety issue and acknowledge the importance of identifying and reducing workplace stressors.

This policy will apply to everyone in the Company. Managers are responsible for implementation and the company is responsible for providing the necessary resources.

#### **Definition of stress**

The Health and Safety Executive define stress as "the adverse reaction people have to excessive pressure or other types of demand placed on them". This makes an important distinction between pressure, which can be a positive state if managed correctly, and stress which can be detrimental to health.

#### **Our Policy**

- The Company will identify all workplace stress factors and conduct risk assessments to eliminate stress or control the risks from stress. These risk assessments will be regularly reviewed.
- The Company will consult with employees on all proposed action relating to the prevention of workplace stress.
- The Company will, as appropriate, provide training for managers and supervisory staff in good management practices.
- The Company will, as necessary, provide confidential counselling for staff affected by stress caused by either work or external factors.
- The Company will provide adequate resources to enable managers to implement the Group's agreed stress management strategy.

## **Responsibilities**

### Managing Director

- Provide guidance to managers on the stress policy.
- Help monitor the effectiveness of measures to address stress by collating sickness absence statistics.
- Advise managers on training requirements.
- Provide continuing support to managers and individuals in a changing environment and encourage referral to occupational workplace counsellors where appropriate.

### Managers

- Implement recommendations of risks assessments within their jurisdiction.
- Ensure there is good communication with staff, particularly where there are organisational and procedural changes.
- Ensure employees are fully trained to discharge their duties.
- Ensure employees are provided with meaningful developmental opportunities.
- Monitor workloads to ensure that people are not overloaded.
- Monitor working hours and overtime to ensure that employees are not overworking, putting in place when appropriate arrangements to ensure drivers are not being asked to work an exceptionally long day; and on the occasions where they are, an overnight stay is considered.
- Monitor holidays to ensure that employees are taking their full entitlement.
- Attend training as requested in good management practice and health and safety.
- Ensure that bullying and harassment is not tolerated within their jurisdiction.
- Be vigilant and offer additional support to any member of staff who is experiencing stress outside work e.g. bereavement or separation.

### Employees

- Raise issues of concern with your line manager.
- Accept opportunities for counselling when recommended.

## **2-5 Welfare and Hygiene**

### ***2-5-1 Statement of Intent***

In accordance with the Health and Safety at Work etc. Act 1974 and Workplace (Health, Safety and Welfare) Regulations 1992 (as amended), the Company shall ensure that it protects the health and safety of everyone in the workplace, and that adequate welfare facilities are provided for its employees at work, including at client sites.

Adequate welfare provision will include washing, toilet, rest and changing facilities, and somewhere clean to eat and drink during breaks. Drinking water will also be made available for employees.

In accordance with legislation, adequate means:

- enough toilets and washbasins for those expected to use them
- where possible, separate facilities for men and women
- clean facilities
- a supply of toilet paper and, for female employees, a means of disposing of sanitary dressings
- facilities that are well lit and ventilated
- facilities with hot and cold running water
- enough soap or other washing agents
- a basin large enough to wash hands and forearms if necessary
- a means for drying hands, e.g. paper towels or a hot air dryer

The Company will also ensure there are suitable first aid arrangements available.

### **2-5-2 General**

Paying meticulous attention to good habits in relation to personal body hygiene will greatly help reduce the spread of diseases and viruses in the workplace. The most important of these good habits is the thorough washing and drying of hands after toilet use and the co-operation of all employees in this regard is requested.

Likewise, if handling food or drink (including tea/coffee making operations) or handling crockery or utensils that are ready for use by others (kettles or cups for example) employees should wash their hands beforehand.

Employees should also be aware of the danger of the spread of viruses through the use of shared telephone handsets and such handsets should be periodically wiped with a clean damp cloth containing detergent or disinfectant.

Office-based employees should always ensure that their work station is adequately lit, well ventilated and heated as appropriate. Any concerns in this regard must be brought to the attention of their line manager.

To help prevent any spread of contamination, engineers are required to follow a suitable standard of personal hygiene practices (e.g. regular washing of hands prior to eating or using the toilet). Toilet and hot water facilities are often available in communal areas of tower blocks, usually on the ground floor. They may also be provided by the tenant at their discretion. Engineers are therefore requested not to abuse this kind hospitality and to make sure these facilities are kept clean and tidy after use.

Dry-wash sanitizing and cleansing agents are provided engineers via on-board dispensing units, as well as a means for drying hands (paper towels).

During times of working in a hot environment, employees will be provided, upon their request, with quantities of cool drinking water and encouraged to drink it frequently in small amounts before, during and after working.

### **2-6 Young Persons**

The company is aware of the additional risks that may follow as a consequence of the employment of Young Persons and will take all measures necessary to minimise those risks so far as is reasonably practicable. To this extent, a Young Persons risk assessment shall be carried out in the event of a Young Person working on Company premises, including when involved in any work experience project. Any further control measures required to ensure the safety and welfare of a Young Person shall be implemented accordingly.

The company is aware of the statutory restrictions imposed upon work undertaken by Young Persons and will comply with these restrictions. Young Persons will be given the increased and concentrated level of information, instruction, training and supervision that is required to enable them to work safely.

Any concerns employees have regarding Young Persons in the workplace should be addressed to their line manager, whereupon measures will be taken to investigate the circumstances and provide a solution where necessary.

#### **2-6-1 Working Alone with Children**

Engineers are STRICTLY PROHIBITED from being left alone in a room or property with any child, Young Person (i.e. any person who has not attained the age of eighteen), or vulnerable adult (i.e. anyone aged 18 and over who has needs for care and support and/or is unable to protect themselves against significant harm or exploitation).

## **2-7 New or Expectant Mothers**

A risk assessment will always be carried out to identify any risk to new or expectant mothers. Where risks to new or expectant mothers are identified, adjustments to working conditions will be made to avoid such risks. Where adjustments are not possible, and no alternative work can be found, the new or expectant mother shall be suspended from work on full pay.

## **2-8 Disability Awareness**

Consideration will always be given to the needs of any disabled or partly disabled employee in the design of workstations so that each task can be carried out safely and in comfort.

The Company shall periodically review access to the premises, and escape routes, and make all reasonable adjustments in accordance with the Disability Discrimination Act 2005 (as amended). To this extent, a risk assessment will be carried out, when required, in respect of risks to any disabled or partly disabled person. (See also **2-36-13 Vulnerable Persons** below).

## **2-9 Accident Procedure**

### **2-9-1 General**

Employees and visitors are required to report all accidents and incidents (including 'near misses') regardless of severity to a first-aider immediately they have occurred, as well as their manager or Senior Service Engineer as soon as possible after the event. In the event of an accident causing injury, the person affected/injured shall complete details of the accident in the Accident Book, although this will be done by the relevant manager if the injured person is not able to do so.

If there is any doubt regarding the severity of the injury, call the emergency services as soon as possible by telephoning 999. If the accident is not serious but hospital treatment is required, transport shall be arranged to transfer the injured party to the nearest hospital.

In the event of death or serious injury, the Company shall in accordance with current law follow RIDDOR guidelines as listed in **2-10 RIDDOR** below.

In any case, an investigation shall be conducted (aided by Mark Needham) to identify the root cause of accident, including interviewing witnesses, scrutinising the work process, looking for evidence at the scene of accident, and inspecting maintenance reports, previous risk assessments, equipment service history etc. All recommendations made by the investigation report shall be implemented and monitored. A relevant risk assessment shall be completed in the event of any accident.

### **2-9-2 Road Accident Reporting Procedure**

There is procedure in place in the event of a road accident, namely:

- Do NOT leave the accident scene
- Stop the vehicle in a safe position and switch off the engine
- Call the police and ambulance service if anyone is injured
- Neither the vehicle nor the passengers should be moved. However, in the event of risk from fire or further traffic accidents, the driver should get passengers out the vehicle and into a place of safety.
- Obtain the details of all witnesses
- Note the details of the third party, including name, address, vehicle registration number, the name of their insurance company and their policy number
- Take pictures of the accident scene (with a mobile phone)
- Sketch a rough diagram of the accident scene
- Do NOT admit liability, seek settlement or offer to negotiate

- Display a warning triangle (if available) to warn other motorists of the danger ahead, but only if safe to do so
- Report to the insurance company via the insurance certificate within the Van Pack; contact the Contracts Manager or Operations Manager to notify them of the situation and await further instructions
- Record the incident using Accident Book procedure

## **2-10 RIDDOR**

From 1 October 2013, new RIDDOR Regulations came into force which introduced significant changes to the existing reporting requirements. In compliance with RIDDOR, therefore, the Company shall ensure it always abides by the following legal requirements:

### ***Work-related Accidents***

Reportable injuries (including deaths) do not have to be automatically reported, but must be reported if they occur as the result of a work-related accident. For the purposes of RIDDOR, an accident is a separate, identifiable, unintended incident that causes physical injury. This specifically includes acts of non-consensual violence to people at work.

When deciding if the accident that led to the death or injury is work-related, the key issues the Company will consider are whether the accident was related to:

- the way in which the work was carried out
- any machinery, plant, substances or equipment used for work; and
- condition of the site or premises where the accident happened.

If any of the above factors are related to the cause of the accident, then it is likely that a reportable injury will need to be reported to the enforcing authority. If none of the above factors are satisfied, it is likely that the Company will not be required to send a report.

### **2-10-1 Types of Reportable Injury**

#### **Deaths**

All deaths to workers and non-workers, with the exception of suicides, shall be reported if they arise from a work-related accident, including an act of physical violence to a worker.

#### **Specified Injuries to Workers**

The list of 'specified injuries' in RIDDOR 2013 include (regulation 4):

- a fracture, other than to fingers, thumbs and toes;
- amputation of an arm, hand, finger, thumb, leg, foot or toe;
- permanent loss of sight or reduction of sight;
- crush injuries leading to internal organ damage;
- serious burns (covering more than 10% of the body, or damaging the eyes, respiratory system or other vital organs);
- scalpings (separation of skin from the head) which require hospital treatment;
- unconsciousness caused by head injury or asphyxia;
- any other injury arising from working in an enclosed space, which leads to hypothermia, heat-induced illness or requires resuscitation or admittance to hospital for more than 24 hours.

#### **Over-Seven-Day Injuries to Workers**

This is where an employee, is away from work or unable to perform their normal work duties for more than seven consecutive days (not counting the day of the accident).

### **Injuries to Non-workers**

The Company shall always report injuries to members of the public or people who are not at work if they are injured through a work-related accident, and are taken from the scene of the accident to hospital for treatment to that injury. However, there is no need for the Company to report incidents where people are taken to hospital purely as a precaution when no injury is apparent. If the accident occurred at a hospital, the report only needs to be made if the injury is a 'specified injury' (see above).

### **2-10-2 Reportable Occupational Diseases**

The Company shall always report diagnoses of certain occupational diseases, where these are likely to have been caused or made worse by their work: These diseases include (regulations 8 and 9):

- carpal tunnel syndrome;
- severe cramp of the hand or forearm;
- occupational dermatitis;
- hand-arm vibration syndrome;
- occupational asthma;
- tendonitis or tenosynovitis of the hand or forearm;
- any occupational cancer;
- any disease attributed to an occupational exposure to a biological agent.

### **2-10-3 Reportable Dangerous Occurrences**

Dangerous occurrences are certain, specified near-miss events. Not all such events require reporting. There are 27 categories of dangerous occurrences that are relevant to most workplaces. For example:

- the collapse, overturning or failure of load-bearing parts of lifts and lifting equipment;
- plant or equipment coming into contact with overhead power lines;
- the accidental release of any substance which could cause injury to any person.

For a full, detailed list of categories, refer to the online guidance at: [www.hse.gov.uk/riddor](http://www.hse.gov.uk/riddor)

### **2-10-4 Exemptions**

In general, reports are not required (regulation 14) for deaths and injuries that result from:

- medical or dental treatment, or an examination carried out by, or under the supervision of, a doctor or registered dentist;
- the duties carried out by a member of the armed forces while on duty; or
- road traffic accidents, unless the accident involved:
  - the loading or unloading of a vehicle;
  - work alongside the road, e.g. construction or maintenance work;
  - the escape of a substance being conveyed by the vehicle; or
  - a train.

### **2-10-5 In-House Reporting Procedure**

Under RIDDOR legislation, employees must report to their manager any accident at work which results in personal injury and will be encouraged to identify incidents where injury was fortuitously avoided (i.e. near miss accidents).

The relevant senior manager shall be responsible for all subsequent investigation and reporting. While all incidents can be reported online, fatal and major injuries will be reported to the Incident Contact Centre on 0845 300 9923 (opening hours Monday to Friday 8.30 am to 5 pm).

## **2-11 First-Aid**

### **2-11-1 General**

Mila Maintenance shall always comply with the Health and Safety (First-Aid) Regulations 1981 (as amended) whereby the Company will provide adequate and appropriate first-aid equipment, facilities and trained persons so that employees or visitors can be given immediate help if they are injured or taken ill.

The Company will therefore ensure:

- All persons have ready access to first aid facilities.
- There is adequate number of trained first aid personnel to deal with accidents and injuries occurring at work.
- First-aid is only carried out by a trained first-aider.
- Every first-aid box will be of the appropriate size and have the correct contents.
- The location of the first-aid box is clearly identified.
- Trained first-aider's (including engineers) remain responsible for the replenishment of first-aid box, first-aid kit and eye wash kit contents.
- All employees using vehicles on Company business are provided with small travelling first-aid kits.
- Employees issued with a travel first-aid kit remain responsible for their replenishment.
- In more serious cases, the injured person is sent or taken to the nearest hospital.

Should any employee have concerns about the provision of first aid within the organisation, they are encouraged to inform their line manager to enable the Company to investigate and rectify the situation as necessary.

### **2-11-2 First-Aid Boxes & Travelling Kits, and Eye Wash Kits**

First-aid boxes and travelling first-aid kits shall contain sufficient quantities of suitable first-aid materials and nothing else. While there is no mandatory list of items to put in a first-aid box or travelling kit, tablets and medicines are NOT allowed.

First-aid boxes and travelling first-aid kits shall be made of suitable material and so designed to protect the contents. All first-aid boxes and travelling first-aid kits and eye wash stations shall be clearly marked (recommended marking - white cross on green background).

In situations where mains tap water is not readily available for eye irrigation, sterile water or sterile normal saline solution (0.9%), in sealed disposable containers, will be provided. Each container should hold 300ml and at least 900ml provided. Once opened they must not be re-used. The use of eye cups or refillable containers is not recommended.

To ensure a sufficient supply of materials, the contents of first-aid boxes, travelling first-aid kits and eye wash kits shall be replenished as soon as possible after use. All first-aid boxes at fixed-sites shall be checked regularly by first-aiders to ensure the contents are not used after their expiry date.

Engineers allocated a Company vehicle should ensure first aid travel kits are sufficiently stocked and to report to their Contracts Manager, Operations Manager or Office Manager any replenishment required.

The recommended minimum contents for a 1-person travel first aid kit (conforming to BS8599-1 standard) are:

- Guidance notes on First Aid in an emergency
- Assorted waterproof plasters x10
- Eye pad dressing x1
- Burn dressing 10cmx10cm x1
- Triangular bandage 90x90x127cm x2
- Safety pins x2
- Medium sterile dressing 12x12cm x2
- Large sterile dressing 18x18cm x1
- Cleansing wipes x4
- Pair nitrile powder-free disposable gloves x1
- Sterile eyewash 250ml
- Foil blanket (adult) x1
- Scissors
- Microporous tape

## **2-12 Violence in the Workplace**

The Company is committed to a policy of equality and diversity whereby it does not discriminate in the employment of its people. As such, we are dedicated to providing our employees a work environment which is free from any form of violence as defined by the Health and Safety Executive. This includes **verbal and mental abuse, bullying and ostracism, physical assault and attack, harassment, verbal threats, and discrimination.**

Incidents such as these result in low morale and can affect the safety or health of employees. The Company will NOT tolerate, therefore, ANY form of victimisation, bullying, assault, harassment or discrimination, and we shall take action against ANY Company employee who breaches this policy, regardless of seniority of that person. Ultimately, this may lead to summary dismissal.

Furthermore, any visitor found to be in breach of this policy shall be removed from Company premises or work site and may be subject to further action being taken against them.

In accordance with its responsibility to ensure that the risks posed by personal violence are properly assessed, controlled and minimised or eliminated, the Company is committed to a programme of regular risk assessment whereby it shall always endeavour to eliminate any such risk to vulnerable employees.

### **2-12-1 Violence at Client Sites**

At induction, engineers shall receive adequate instruction supported by suitable information concerning procedures in the event of incidents of violence or abusive behaviour towards them when working at client sites.

As part of the process to monitor personal safety, Managers shall periodically visit engineers to maintain regular surveillance. Periodic contact from engineers, the absence of which will raise the alarm, is also positively encouraged (see also **2-15 Lone Working** below).

Any incidence of violence towards any of our employees whilst working at a client site shall be reported immediately or as soon as possible to a member of the client's management team for investigation and resolving.

## **2-13 Office Safety**

### **2-13-1 General**

All office-based employees have a duty to assist in reducing the risk of accidents and fire. The following rules and precautions, in conjunction with all those relevant within this Health & Safety Policy, are therefore to be specifically observed:

- Keep desks tidy and ensure that waste paper is disposed of regularly.
- Never leave unattended filing cabinet drawers open.
- Never open more than one filing cabinet drawer at a time.
- Always handle toner cartridges in accordance with the manufacturer's instructions.
- Ensure that cables and connections on all electrical equipment are not damaged before use.
- Do not allow cables to trail across walkways.
- Ensure all passageways, stairs and doorways are kept clear of any obstruction.
- Keep combustible materials away from ignition sources.
- Ensure all flammables are kept in secure fire resistant storage.
- Access to fire-fighting equipment must never be obstructed (e.g. never drape your coat or cardigan over a fire extinguisher).
- Keep fire doors shut – fire extinguishers must NEVER be used to 'prop open' these doors.
- Clear all spillages as soon as possible.

Note: ALL obsolete, discarded and other such unrequired paper document(s) MUST be shredded in accordance with the Company's security procedure.

### **2-13-2 Footwear**

Mila Maintenance does not require female office employees to wear a particular shoe heel size but advises them to consider the health & safety risks. Pressure on the feet wearing high heels can be painful and cause the wearer damage – wearers can also suffer injuries after tripping, falling or slipping. The Company's equal opportunities dress code allows female employees to wear formal plain flat shoes or plain court shoes as they prefer – there is no written policy on wearing high heels. However, shoes should be comfortable but formal in accordance with expected business standards.

## **2-14 Lone Working**

The Company will always investigate the potential hazards faced by lone workers and assess the risks involved both to the lone worker and to any person who may be affected by their work. The Company shall then ensure that adequate measures are in place to eliminate or reduce such risks.

If the risks of the job cannot be adequately controlled by one person, lone working activity must NOT be undertaken in ANY circumstance.

Where employees are able to work alone safely, a mobile phone will be provided as a means of summoning help, such as to call for assistance in an emergency. A periodic system of contact will be made between the lone worker and their line manager, the absence of which will raise the alarm. Line managers shall periodically visit and observe employees working alone, and checks shall be made to ensure the lone worker has returned to their base or home safely at the end of their work shift.

## **2-15 Security**

The Company has in place suitable security measures to protect against or deter the risk of intrusion or arson.

If an employee sees any person unknown to them on the premises or if they are acting in a suspicious manner, they MUST inform their line manager or a site manager IMMEDIATELY.

Personal vehicles are left on Company's premises entirely at the owners' risk. The Company will not be held responsible for any theft or damage to an owner's vehicle or property stored within howsoever caused.

Engineers are required to park their vehicles as close to the work area as possible and to ensure their vehicles are kept locked and secured at all times when not in use.

At the end of shift, all tools and portable equipment are to be removed from the building or locked away. No tools or equipment are to be left overnight in Company vehicles.

## **2-16 CCTV**

In accordance with the Data Protection Act 1998 (as amended), the Company shall place signs next to cameras so that all persons are aware they are entering an area covered by surveillance equipment. These signs shall identify this Company or person responsible for the scheme, and shall give details of who to get in contact with regarding their operation e.g. address or phone number.

In accordance with CCTV code of practice under the Data Protection Act 1998 (as amended) Section 51(3)(b), images recorded shall be solely for the purpose for which any camera has been installed i.e. to prevent and detect crime. They shall be positioned so that images captured enable identification of the perpetrator(s). Cameras shall be properly maintained and serviced, therefore, to ensure that clear images have been recorded at all times.

## **2-17 Housekeeping**

Accidents happen more frequently in an uncontrolled or untidy environment. It is necessary for Company employees, therefore, to ensure a high standard of cleanliness is attained as often as possible. Employees are further required to inspect their area of work daily for safety and health hazards, and to report all significant findings to their line manager immediately.

Employees are required to take the following precautions:

- Clear all spillages immediately or as soon as possible.
- Safely dispose of any rubbish, debris or scrap as soon as possible.
- Waste materials (glass, timber, metal, paper, packaging etc.) must be separated and placed in suitable clearly-labelled waste containers.
- Keep emergency exit routes, pedestrian walkways and stairways unobstructed at all times.
- Keep worktops and desks uncluttered.
- Sweep up at the end of shift.
- Store materials and equipment safely and securely.
- Clean any equipment at the end of shift, and in accordance with the manufacturer's instructions.

## **2-18 Workplace Monitoring**

The Company will at all times ensure compliance with the Management of Health and Safety at Work Regulations 1999 (as amended) as well as the Workplace (Health, Safety & Welfare) Regulations 1992 (as amended). This requires regular inspections of the workplace from time to time, and compliance checks to ensure individuals are working safely as well as being adequately protected from any harm. Inspections will be of a routine nature or as a result of an event or a planned change in working procedure. These provide the Company, as well as individuals, the opportunity to review the continuing effectiveness of safe working practices. Inspections also provide opportunity for implementing change where necessary.

The management of health and safety performance will be monitored at all levels by:

1. External Safety Audit – currently using Arden Risk Consultancy Limited.
2. Quarterly loss prevention inspections (overseen by the Senior Management team).
3. Collation of accident statistics.
4. Periodic workplace inspection.

## **2-19 Environmental Policy**

### **2-19-1 General**

Mila Maintenance and its employees have a duty to act responsibly towards customers, work colleagues, suppliers, contractors and members of the general public with regard to the effect that its business operations may have on the environment. The Company is therefore dedicated to helping protect the environment from any work activity that may cause it harm or damage and will endeavour to achieve its responsibilities through the following objectives:

- To adhere to any current legislation and where possible to anticipate new requirements, reviewing procedures as required.
- To promote the use of energy efficient systems in business premises.
- Where possible, to purchase from suppliers who share concern for the environment products from sustainable sources.
- To replace products, work process, or equipment with an environmentally-safer alternative, if reasonably practicable.
- To support organisations promoting environmental protection issues.
- To minimise waste from business operations and where possible to re-use or recycle.
- To endeavour to control and minimise the level of harmful emissions, including vehicle exhaust and diesel operated power source emissions, whenever practicable.
- To ensure all Company hazardous waste products are collected regularly by a licensed service contractor.
- To ensure hazardous substances are kept in containers fit for the purpose, and stored so they do not put the environment at risk.
- To ensure hazardous substances or waste does not enter surface water drainage or sewage systems.
- To review risk assessments which are relevant to environmental issues on a regular basis or when the assessment is considered no longer valid.
- To encourage employees to switch off lights, and any electrical equipment when not in use.
- To eliminate or reduce noise to as low a level as possible.

The Company will continue to monitor, evaluate and improve its performance whilst always promoting environmental awareness to employees.

Any reasonable request to view the full text of the Company's Environmental Policy can be made through line managers, Office Managers or Mark Needham.

### **2-19-2 Flooding (at Barnsley Unit, Folkestone Office or Ashford Depot)**

In the event of major flooding at the Company's premises, a disaster recovery plan is contained within the *Flood Disaster Recovery Guidelines*. This document includes separate evacuation and return-to-work procedure details for managers and employees, as well as guidelines on preventing any risk to health during the clean-up operation.

## **2-20 Substances Hazardous to Health**

The Company will comply with the Control of Substances Hazardous to Health Regulations 2002 (COSHH) (as amended). Risk assessments shall be undertaken of all hazardous substances used by employees, as well as for the work process involving exposure of any persons to hazardous substances, whereby the Company will ensure that any exposure is eliminated or minimised and controlled. To this extent, all managers will aid in the carrying out of COSHH assessment procedure to ensure that suitable and sufficient assessments of the risks have been taken account of.

Employees who will come into contact with hazardous substances during their normal work procedures will receive training and information on the health and safety issues concerning such substances, including safe use, handling and storage. Employees working with hazardous substances must at all times follow Company precautions and procedures, as well as manufacturers' guidance relating to the substances.

Employees must assume that all substances are hazardous unless proved otherwise and must abide by all the hazard information provided by risk assessment and manufacturers' safety data sheets. If any employee is in any doubt as to the substance or its method of use, they must consult their line manager or relevant Contracts/Operations Manager prior to working with such substances. Where exposure cannot be adequately controlled by engineering means, appropriate PPE will be provided free of charge after consultation with the relevant employee(s).

Substances hazardous to health can be natural or artificial substances (including micro-organisms), which may be toxic, harmful, corrosive or irritant to any person exposed to them. In the event of contamination, the employee should find out the substances and its source and, if injury occurs he/she should contact a First-Aider, his/her own doctor or local hospital (Casualty Department) for treatment without delay.

The implementation of this particular sub-policy requires the complete cooperation of all members of management and staff.

## **2-21 COSHH Precautions**

Under the Control of Substances Hazardous to Health Regulations 2002 (COSHH) (as amended) employees must take the following precautions:

- Handle hazardous substances with care and use any local exhaust ventilation (LEV) equipment or/and personal protective equipment supplied the way it is intended to be used.
- Be familiar with practices and procedures for using hazardous substances.
- Before eating, drinking and smoking it is very important to ensure that hands, and in some cases face and exposed skin, are washed. Do not eat in areas used for dispensing hazardous substances.
- Remove lids/stoppers to hazardous substances only when the substance is to be used.
- Store hazardous substances safely and securely in purpose-made/built containers/compound, and use manufacturers' recommendations as a clear guideline to these procedures.
- Only minimum quantities are to be kept in the workplace i.e. the absolute minimum amount required for immediate use or the requirement of the business.
- All hazardous spillages must be cleared immediately and disposed of safely.

The Company will always endeavour to obtain manufacturers' safety data sheets in order to provide employees with all relevant safety, health and environmental information, and to ensure they understand the risks from the hazardous substances they could be exposed to.

An inventory of hazardous substances that are kept on Company premises is available for reference and in-house training purposes.

## **2-22 Personal Protective Equipment (PPE)**

### **2-22-1 General**

In accordance with the Personal Protective Equipment at Work Regulations 1992 (as amended), Mila Maintenance will always consider alternative control measures to minimise risks in the workplace, and shall insist on the use of PPE only when a risk to health and safety cannot be adequately controlled by other means.

To this extent, the Company will ensure all employees are provided with properly fitting, suitable, and effective personal protective equipment relevant to the hazards they will be exposed to, supported by the provision of adequate training and information on the use, maintenance (including cleaning and when the equipment must be replaced) and purpose of the PPE issued them.

Likewise, all visitors shall be issued with suitable protective equipment for their personal safety, which must be worn at all times when required to do so.

Employees must ensure that any PPE provided by the Company is maintained by themselves in good working order, and that all employees who are provided with PPE must wear or use such protective equipment properly i.e. for the protection purpose intended. Employees must report immediately any defective personal protective equipment to their manager or Senior Service Engineer. When not in use, PPE must be stored safely.

All PPE will be CE marked in accordance with current health and safety legislation. Any PPE that is non-marked will only be used if it still offers adequate protection.

The Company will, from time to time, carry out spot checks on employees and visitors to ensure full compliance with this Personal Protective Equipment Policy. Failure to wear PPE whilst on Company premises when required to do so shall result in offenders being ejected immediately, irrespective of whether they are employees, visitors or contractors.

When applicable, hazard warning signage will indicate appropriate PPE-controlled zones.

During times of any structural alterations being made to the Company's premises, such as refurbishment, it may be necessary to provide employees and other persons with safety helmets and appropriate clothing and footwear. These must be worn at all times whilst present on site unless instructed to the contrary. Employees will, however, be notified of all safety requirements prior to any such work being carried out.

All requirements for protective clothing and equipment will be identified by:

- a. Office Managers and
- b. Relevant Contracts Manager or Operations Manager.

Individual requests for replacement or supplementary PPE/RPE should be made to the relevant line manager who is authorised to issue it. Stock replenishment shall be carried out by Office Managers or a member of the office administration team.

### **2-22-2 Minimum Individual Requirements – PPE**

The following is a list of personal protective equipment that employees **MUST** wear when requested to do so and/or when safe working practices and/or risk assessment require it, detailing the minimum specification required by the Company to ensure optimum safety:

**Body harness, lanyard and karabiners:** Adjustable full body fall restraint harness with attachment points, conforming to BS EN361 (or, when appropriate, EN363 fall arrest system consisting harness together with fall arrest lanyard and energy absorber to EN 355) with lanyard to EN354 and karabiners to EN362 - attached to a designated load tested anchor point.

**Eye protection:** Safety goggles or spectacles min. BS EN166, 'F' marked for maximum protection against impact, chemicals, dust, molten metal, and liquid splashes.

Engineers are positively encouraged to wear safety sunglasses conforming to minimum EN166-1F (impact), EN170 (UV), and EN172 (solar protection) whenever they are directly facing the sun or affected by its reflection during works.

**Head protection:** Hard hat (NOT 'bump cap') to BS EN397, fitted with easily adjustable headband and integrated ventilation, and lightweight so as to be worn for long periods.

**Hearing protection:** Plugs or ear defenders conforming to EN 352-1 (defenders) or EN 352-2 (plugs) with SNR above 30db.

**Hi-visibility jacket:** Compliance with BS EN471 Class 3.

The wearing of hi-visibility clothing will not normally be a mandatory requirement for engineers working at a domestic property. However, a hi-visibility waistcoat or jacket **MUST** be worn at all times in the following circumstances:

- by engineers when the contractual risk assessment/method statement (RAMS) makes this a mandatory requirement
- by drivers and passengers when inside the cab of any Company vehicle being used for Company business
- by all persons entering a Company fixed-site vehicle yard

A hi-visibility waistcoat or jacket should also be worn at the discretion of engineers when entering any busy traffic route to ensure they are clearly seen by other drivers.

**Safety clothing:** Polycotton coveralls snug fitting at wrist and ankle. Also available is PVC-coated nylon and cotton clothing offering weather protection, as well as polar fleece jackets. Summer protection includes polycotton cargo trousers and polo shirt. All protective clothing is to be kept cleaned and replaced once damage occurs.

**Safety footwear:** to min. BS EN345 or EN ISO 20345, preferably with mid sole protection, resisting corrosion, abrasion and industrial wear and tear. Soles should be moulded or bonded to the upper to prevent separation and subsequent exposure of the foot to hazard. All safety footwear **MUST** be fitted with steel toe-caps.

**IMPORTANT:** Safety footwear should not be worn when driving Company vehicles if it prevents drivers using the controls in a safe and correct manner. To this extent, any footwear used for driving should:

- Have a sole no thicker than 10mm but the sole should not be too thin or soft.
- Provide enough grip to stop the foot slipping off the pedals.
- Not be too heavy.
- Not limit ankle movement.
- Be narrow enough to avoid accidentally depressing two pedals at once.

However, safety footwear **MUST BE WORN** by drivers (and their work colleague passenger(s)) immediately before exiting their Company vehicle, regardless of location.

**Safety gloves:** chemical resistant protective gloves to EN374 (typically Nitrile/Butyl) to BS EN374; rigger and knit-wrist to BS EN388 safety gloves to provide flexible and comfortable wear, as well as offer maximum protection and good grip with minimum loss of dexterity.

Kevlar gloves should be worn when handling broken glass.

If there is any doubt over what PPE should be worn, employees should consult their line manager for clarification.

### **2-22-3 Respiratory Protective Equipment (RPE)**

Dusts, particulates, fumes, vapour and mists are a health hazard and suitable masks shall be provided by the Company. These must be worn by engineers particularly when operating cutting equipment or abrasive wheels without LEV, when drilling into any solid surface, and during the application of hazardous substances as required by the relevant manufacturer's safety data.

Only the right filters for the relevant hazard and task are to be fitted to respirators. Filters must be changed in accordance with manufacturers' instructions or when contaminants can be detected either by smell or taste (known as 'breakthrough'). However, employees should not routinely rely on smell or taste but to change filters before breakthrough occurs.

Clear information and training shall be provided wearers as to correct fitting and use.

#### **Important:**

- Masks must NOT be modified or worn in a way that compromises protection
- Any dirty, damaged or incomplete mask must not be worn
- Disposable particulate masks must be thrown away after every use
- Reusable masks must be cleaned after use before being stored away from contaminants
- Wearers who have facial hair must not use particulate respirators as they come between the respirator and skin, rendering the mask ineffective.

Any employee having any doubts about which type of RPE is adequate for the work task they are to embark upon should refer to the respective manufacturer's safety data sheet or consult with their line manager prior to any work being carried out.

### **2-22-4 Minimum Individual Requirements – RPE**

The following is a list of respiratory protective equipment (RPE) that employees MUST wear when requested to do so and when safe working practices and conditions dictate, detailing the minimum specification required by the Company to ensure optimum safety:

#### **Disposable Dust/Particulate Respirators**

The majority of disposable dust/particulate respirators currently on the market are designed to protect the wearer's lungs from particle irritants as well as pneumoconiosis, fibrosis-producing dusts, and mists.

For maximum protection, however, the Company requires engineers (and visitors when applicable) to wear a FFP3 filtering half-mask (the highest protection factor) to protect against high concentrations of very fine toxic particles, whilst a FFP2 disposable mask is needed to protect against ferrous metal fumes, hard wood and dusts. However, FFP2 and FFP3 **must not** be used where there is an oxygen-deficient atmosphere or harmful gases and vapours present.

All respirators provided employees and visitors shall comply to EN149.

#### **Half Face Respirators**

Half face respirators consists of a rubber face seal that fits over the nose and under the chin. It is fitted with cartridges that purify the air as the user breathes. Different types of cartridges are available for different types of air contaminants.

A half-mask fitted with filters P3, A2P3 or ABEK2P3, are appropriate for filtering wood dust. An A1P2 filter system is required to protect wearers against organic vapours/gas and fine dusts and fibres.

Half-face respirators and filters shall comply, typically, to EN136, EN140, EN148, EN405 etc.

**IMPORTANT: Nuisance Dust Face Mask**

Employees who work with harmful dusts must NOT use nuisance dust masks to protect themselves from exposure. Nuisance dust masks are not protective devices, are not classified as PPE and are not CE marked to the requirements of the PPE Directive. Nuisance dust masks, which are available from most DIY stores, consist of a thin metal plate that holds a piece of gauze over the nose and mouth or a lightweight filter that looks similar to a disposable dust respirator. Nuisance dust masks typically have only a single head-strap.

**2-23 Workplace Noise**

It is the Company's duty in accordance with the Control of Noise at Work Regulations 2005 (as amended) to provide employees and visitors with hearing protection, if requested by them, if workplace noise levels are between 80dB(A) and 85dB(A). By law, all employees and visitors have the right to request suitable and efficient hearing protection which is free from any defects.

If workplace noise levels are above 85dB(A), the Company shall automatically provide all employees and visitors with suitable and efficient hearing protection which **MUST BE WORN**. Employees and visitors have a legal duty to wear hearing protection provided under these circumstances, and to report any defects.

The Company will always endeavour to ensure that risk from the exposure of employees, visitors, general public and persons in neighbouring buildings to noise is either eliminated at source or, where this is not reasonably practicable, reduced to as low a level as is reasonably practicable.

During their induction, employees will be provided with adequate training supported by information on why ear protection is issued; when, where and how it is to be used; what steps to take to minimise risks; and their obligations under the Control of Noise at Work Regulations 2005 (as amended). The Company will, from time to time, provide refresher instruction for all employees.

The Company shall obtain, where reasonably practicable, equipment designed to reduce the emission of noise. To help minimise noise and vibration caused by faults, wear and tear, equipment shall be repaired in-house, otherwise an outside contractor shall be used. Any replacement parts and spares shall be inspected for flaws upon arrival at the premises. When applicable, appropriate hazard warning signage will be located at relevant points of entry indicating mandatory wearing of PPE for respective hazard zones.

In accordance with the workplace noise Regulations, the Company will provide, where appropriate, information obtained following any health surveillance, including, where possible, any published information.

**2-24 Manual Handling Operations**

**2-24-1 Statement of Intent**

The Company will always comply with the Manual Handling Operations Regulations 1992 (amended 2002). Manual handling operations will be avoided as far as is reasonably practicable where there is a risk of injury. Where it is not possible to avoid manual handling operations, an assessment of the operation will be made taking into account all factors such as the feasibility of the manual handling operation, the load, the working environment and the capabilities of employees and risk to their safety.

Under this Policy, all employees MUST adhere to the following guidelines:

- The lifting of objects should be done by using mechanical devices rather than manual handling where such devices are provided, and the devices should be appropriate for the task.
- The object to be lifted or moved must be inspected for sharp edges and other hazards such as wet or greasy patches, and appropriate steps taken to remove or reduce such hazards.
- If lifting or moving objects with sharp or splintered edges, clean dry protective gloves must be worn to ensure a firm grip.
- The route over which the object is to be lifted or moved should be inspected to ensure that it is free of obstructions or spillage or other hazard (such as fumes or vapour).
- Employees must not attempt to lift or move an object which is too heavy and which might damage their health. Under these circumstances, colleague assistance must be used.
- Where the lifting or moving of an object is to be done by more than one person, one of the persons should be designated as the supervisor of the operation, so as to coordinate the lifting or moving.

### **2-24-2 General**

All managers will assist in the completion of manual handling risk assessment procedure to ensure that suitable and sufficient assessment of workplace hazards has been taken account of.

It is the Company's objective for a responsible employee to attend an accredited course for qualification as a workplace instructor in lifting and correct manual handling methods, and to subsequently develop a programme for regular manual handling refresher, and induction, training.

Engineers, especially, are required to self-monitor manual handling activity, particularly during spells of hot, cold or wet weather, to decide if there are mitigating factors which may affect grip and put into place any preventive and protective measures to help avoid injury. ALL employees MUST adhere to the following procedure for the lifting of loads:

1. Plan the lift by assessing its weight, ease of grip, the route etc. make sure the work area is clear from hazards. Make sure suitable personal protective equipment is being worn.
2. Place feet apart, close to the load. Bend the knees slightly, around the load if possible. Keep the back straight and upright, with shoulders and hip level and in line.
3. Using both arms, grip the load securely, with arms close to the trunk. Use legs to lift up trunk and load. Do not twist the trunk.
4. Hold load with heaviest side close to the trunk. Move feet, do not twist body. Carry load to destination.
5. Adjust load in position after putting load down.

### **2-25 Walkways and Passageways**

Walkways and passageways must be kept clear at all times from obstructions.

Walkways or passageways that become slippery should be clearly marked with warning signs until the slippery surface has dried or has been removed.

Changes in the floor elevation of any walkway or passageway shall be clearly marked.

Long or sharp edges to objects stored in or around walkways or passageways must be removed or adequately covered to ensure the prevention of injury to persons.

Warning signs must be placed as appropriate to indicate any hazard that may injure or obstruct the accessing persons.

## **2-26 Workplace Equipment**

### **2-26-1 General**

The Company will always comply with the Provision and Use of Work Equipment Regulations PUWER 1998 (as amended), the Supply of Machinery (Safety) Regulations 2008 (as amended) and the Lifting Operations and Lifting Equipment Regulations (LOLER) 1998 (as amended), and will at all times ensure, where reasonably practicable, that all equipment used in the workplace is safe and suitable for the purpose for which it is intended.

All new equipment will be assessed prior to purchase so as to ascertain any safety issues apparent during its subsequent use or operation. The Company will, where reasonably practicable, obtain equipment designed to reduce the emission of noise and vibration.

Accordingly, employees will be provided with adequate training, instruction and information to enable them to use the relevant equipment safely. Equipment must only be used by adequately trained and authorised persons.

The Company will ensure, where reasonably practicable, that work equipment is regularly serviced and maintained in good working order and repair by a competent person. Employees must report any defective work equipment to their line manager as soon as it is found to be defective.

Where applicable, employees will be provided with such protection as is adequate to protect them from dangers occasioned by the use of work equipment and such work equipment will be clearly marked with health and safety warnings as appropriate.

### **2-26-2 Plant, Equipment and Power Tools**

The following policy must be strictly adhered to:

- Only adequately and suitably trained and qualified persons are authorised to operate or clean plant, equipment or power tools. *Operators must understand the safe operation of the equipment or power tools they are using, including appropriate safety precautions to be taken, as well as be aware of the risks from the hazards they could be exposed to.*
- Trainees MUST be supervised at all times until they are considered competent to continue working with equipment and power tools unsupervised.
- Users of any plant, equipment or power tools must ensure that it is in good working order prior to use, and well maintained. Any defect must be brought to the immediate attention of their Senior Service Engineer or manager. Unsafe, faulty or unsuitable equipment or power tools must not be used and shall be immobilised by their Senior Service Engineer or manager until made safe or permanently removed from Company premises.
- Plant, equipment or power tools must only be used for the purpose they are designed for.
- Users can only use attachments if specifically made for the purpose and operators are adequately trained to use them.
- Any adjusting wrenches or removal tools must be removed from the relevant equipment when not in use.
- The Company requires all electric power cords are kept above head level or in the floor in such a way that they are not tripping hazards.
- Floor space must be kept sufficient, whenever possible, for the size of work being processed safely without persons hitting other workers or equipment.
- All machine guards must be properly fitted and kept in the appropriate position at all times whilst the relevant machine is being operated. Any damage or fault must be brought to the attention of a line manager immediately.

- Machine guards must NOT be overridden, bypassed, removed or made ineffective when the equipment is activated. Disciplinary action shall be taken against ANY person found to be tampering with the safety mechanisms of equipment or power tools (including any audible or visible warning devices fitted to indicate danger, a fault condition, the presence of a potential hazard, or machine about to start), which may ultimately lead to their dismissal from the Company.
- No equipment must be used beyond the marked safe working load or rotation speed, except for the purpose of testing, which must be supervised by a competent person.
- Machine bed markings indicating the maximum to which operators' limbs can safely extend to must be adhered to at ALL times.
- Official notices or instructions on plant, equipment or power tools must be obeyed.
- Employees using equipment or power tools must avoid awkward operations and hand positions where a sudden slip could cause hands to move into moving parts or the cutting blade etc.
- Plant, equipment or power tools must not be left running whilst unattended. Operators are required to switch the machine off when it is not in use and to isolate the power at source (i.e. power switched OFF). Power tools must be left in a safe place and condition after use.
- Operators using equipment which discharges sparks, spatter or other debris with the potential of causing ignition must carry out an hourly *fire watch* in their work area to check for any evidence of smouldering.
- Operators are required to keep the work area tidy and free from debris and the accumulation of waste.
- At the end of each working day or shift, all practical steps must be taken to secure all equipment or power tools.
- Equipment and power tool parts and spares must be inspected for flaws upon arrival, but only by employees authorised to do so.
- Whilst repairs and maintenance are being carried out, relevant machinery MUST be turned OFF and isolated at their power source and locked out. Adequate signage MUST be used in power switch rooms warning others not to turn to ON specific switches relevant to the machinery being repaired or maintained.
- A risk assessment shall be carried out in the event of a young person i.e. any person who has not attained the age of eighteen, being employed by the Company.  
**Note: *No Young Person is allowed to use or clean equipment or power tools.***
- Any clothing, jewellery or long hair that might pose a risk to safety when using equipment or power tools must not be worn.

### **2-26-3 Electrical Equipment**

The following policy must be strictly adhered to:

- All electrical equipment (including power tools, machinery, heaters) whether fixed or portable, will be subject to periodic testing (e.g. P.A.T.), in accordance with the current edition of the Institution of Electrical Engineers' Regulations for Electrical Installations, with appropriate records kept on file by Tristan Cooke.  
*Note: The term portable applies to any appliance which is fitted with a mains plug designed to be connected to a 110/240V supply.*
- The correct voltage for equipment and power tools must always be used.
- Any electrical equipment used externally must be adequately protected (e.g. suitable RCD safety adaptor fitted) to prevent against earth leakage and the risk of fatal electric shock.
- Leads must not be allowed to trail, as this may cause a tripping hazard or damage to the leads.
- The use of electrical extension leads and multipoint adaptors must be kept to a minimum.
- It is STRICTLY FORBIDDEN for any employee to work near any live conductor, except where the live conductor is insulated so as to prevent danger; that the employee is authorised and working at a safe distance from the conductors so they are at no risk of injury, and that they have been sufficiently trained.

- Frayed electrical leads must be repaired or replaced immediately.
- Operators must ensure that they are familiar with any safety instructions (including manufacturer's instructions) relating to any equipment before use.
- It is forbidden to interfere with any electrical appliance.
- The Company shall, whenever possible, provide padlocks or guards to prevent accidental actuation of switches, particularly those which may already be turned off due to maintenance or repair work being carried out on equipment elsewhere in the building.
- Operators are required to inspect all electrical tools, leads, plugs and sockets prior to use, and to report immediately to their line manager all damages or faults.
- It is forbidden to carry out any repairs or maintenance, or fit any plug, to an electrical appliance unless authorised to do so i.e. carried out by a fully trained and qualified *competent person*.
- No electrical appliance may be connected to an electrical system by any means other than the correct plug or connection.
- Temperature or other control settings must NOT be set to exceed their limits.
- All items of electrical equipment must be turned off when not in use (e.g. at the end of shift, or day), and unplugged where appropriate (unless 24hour operation is required).

#### **2-26-4 Tag out/lock out procedure**

The Company shall provide padlocks or guards to prevent accidental actuation of switches, particularly those which may already be turned off due to maintenance or repair work being carried out on equipment elsewhere in the building. It is therefore STRICTLY FORBIDDEN for any person to tamper with or remove any warning tag, padlock or guard that has been installed for the purpose of preventing accidental actuation of switches.

#### **2-26-5 Hiring of Equipment**

No equipment shall be hired by the Company unless, prior to use:

- The equipment has been declared safe by a competent person representing the hire company, and is supported by current thorough examination certification and risk assessment to validate its safe condition.
- The equipment hired is suitable for the task and conditions it is used for.
- The person using the hired equipment is trained or competent to do so.
- Any training and instruction is provided operatives and all relevant personnel.
- The hired equipment complies with PUWER.

#### **2-27 Driving for Work**

##### **2-27-1 Driver Competency**

Only competent (i.e. adequately trained and qualified) persons are authorised to drive Company vehicles or vehicles for Company business.

In accordance with the Company's alcohol and drugs policy (see **2-4-2** above) and the law, employees are STRICTLY FORBIDDEN to undertake any driving duty while under the influence of drugs or alcohol, or while taking a course of medicine, that might impair their judgement, or if mentally unfit to do so. This ruling relates to the use of ANY workplace vehicle, such as Company van, rented vehicle for business use, lift truck etc.

Consideration shall be given to providing drivers an eye and eyesight test by an optometrist or doctor paid for by the Company upon reasonable request.

### **2-27-2 Driver Fatigue**

The Company shall adhere to the Working Time Directive.

Managers are required to periodically review driver fatigue and will implement measures to guard against it.

No driver will be required to drive continuously for more than 2 hours without at least a 15 minute break. Where possible, breaks and break locations should be determined prior to starting each long journey.

Where employees have to travel a long distance to a work location the Company shall consider providing overnight accommodation.

For their part, if any employee feels dangerously fatigued or sleepy they should not drive.

### **2-27-3 Maintenance and Care of Company Vehicles**

The Company shall ensure any workplace vehicle is inspected and serviced at appropriate intervals and thoroughly examined by a competent person at least every 12 months or at intervals set by the competent person. If in doubt, always consult your line manager.

Users of any Company vehicle must ensure that it is in good working order prior to use, and well maintained. A visual safety inspection must be made, therefore, prior to each use of the vehicle to identify any hazards. Any damage, defect or other hazard must be brought to the immediate attention of a line manager.

Checks should include:

- ❖ steering for correct operation and ease of movement
- ❖ service and parking brake functioning correctly
- ❖ tyres for damage and foreign objects
- ❖ seat restraints for condition and correct operation
- ❖ pedals for ease of movement
- ❖ condition of battery
- ❖ brake fluid level
- ❖ wheel nut tension
- ❖ engine oil level
- ❖ coolant strength and level
- ❖ all lights are functioning correctly
- ❖ fuel (petrol or diesel) level

Checks should be recorded weekly using the MM18 Timesheet/Vehicle Checklist.

The following must also be adhered to as a requirement of Company health & safety policy:

- Unsafe, faulty or unsuitable vehicles must not be used under any circumstance.
- Seat belts **MUST** be worn any time the vehicle is moving.
- Drivers and passengers are strictly **FORBIDDEN** to smoke inside **ANY** vehicle (including hire vehicles) when using it for Company business purposes.
- Drivers and passengers **MUST** wear suitable hi-visibility vest or jacket at **ALL** times when using Company vans.
- Speed limits and restrictions (such as at motorway road repairs) must be adhered to always. Speed limits along the Barnsley Unit, Folkestone Office and Ashford Depot vehicle routes must also be obeyed.
- Speed restrictions at **ANY** site where Company vehicles are used **MUST** be adhered to at all times.
- No vehicle must exceed its safe working load, except for the purpose of testing, which must be supervised by a competent person.

- All loads must remain safe and secure throughout the journey. Drivers are to check their load hasn't shifted dangerously prior to off-loading from the vehicle.
- Drivers are STRICTLY FORBIDDEN to provide lifts for any unauthorised person (such as friends, relatives, hitch-hikers) while using a Company vehicle or vehicle on Company business.
- When parking up, drivers must ensure their vehicle does not obstruct the highway, other vehicles, emergency vehicle routes or access to properties; and there is adequate separation of vehicle and pedestrian routes.
- Drivers must ensure that clear access is available to reverse and manoeuvre the vehicle by
  1. ensuring that no person(s) or object(s) is obstructing that access prior to manoeuvring the vehicle, particularly when reversing;
  2. by making use of rear view mirrors when appropriate; and
  3. by using the guidance of an experienced signaller ('banksman') if available.
- Vehicles must not be left running whilst unattended. Any Company vehicle that is parked up must have its brakes fully on, doors locked and all keys removed when not in use.
- Only the fuels specified in the vehicle users' manual shall be used.
- Official notices or instructions on/within vehicles must be obeyed.
- Drivers should check with their line manager for any other instructions and/or safety precautions regarding the operation of Company vehicles.

## **2-28 Display Screen Equipment (DSE)**

The Company will always comply with the Health and Safety (Display Screen Equipment) Regulations 1992 (as amended).

All users of DSE, in particular any employee classified under the Regulations as habitual users of DSE as a significant part of their normal work, will be given adequate training supported by information concerning the safe use of all relevant equipment, and be informed of the risks from the hazards they could be exposed to, as well as the measures in place to protect them from those hazards. All subsequent training and instruction will be recorded for evidence of attainment and placed on file for future reference.

All persons new to using DSE shall be supervised until considered competent to continue working unsupervised. Only authorised persons who are adequately trained and/or sufficiently experienced are allowed to use DSE.

All DSE users will be required to assist in the carrying out of any risk assessment procedure to ensure that suitable and sufficient assessments of the risks have been taken account of. All DSE will be maintained by the Company in an efficient state and safe working order, and kept in good repair. The Company shall always ensure workstations and equipment is organised specifically to maximise comfort and practicality for DSE users.

Subsequently, employees are required to take care of all display screen equipment they use, and related furniture, to the best of their ability, and to report any defect or damage as soon as possible. Users are required to make a visible safety inspection of equipment prior to use. Any willful damage or misuse of DSE shall result in disciplinary action being taken against the perpetrator, which may lead to their summary dismissal from the Company.

The Company shall ensure risks to users of screen monitors are reduced as much as is reasonably practicable. To this extent, employees regularly using screen monitors will be allowed periodic breaks during their work task – 5-10 minutes after every hour i.e. employees are required to use DSE for no longer than one hour continuously.

Any employee who habitually uses DSE as a significant part of their normal work shall have any eye and eyesight test (by an optometrist or doctor) paid for by the Company upon request. In accordance with the Regulations, the Company will pay for spectacles but only if special ones (for example, prescribed for the distance at which the screen is viewed) are needed and normal ones cannot be used.

The Company requires employees to ensure all non-essential DSE peripheral equipment is switched off at the end of their shift or business day.

DSE users are required to ensure their workstation is free from any electrical hazards such as overloaded extension cables, or broken plugs or sockets, and electric power cords are positioned in such a way that they do not create tripping hazards.

The Company shall always consider purchasing alternative equipment which eliminates or reduces exposure to radiation or screen flicker when looking to acquire new or replacement DSE.

## **2-29 Mobile Phones**

While mobile phones should only be used for Company business purposes, Mila Maintenance recognises that employees may have to use their mobile phone occasionally for personal use. Such use should be kept to a minimum and calls must only be made when it does not put the user or any other person at risk from injury or harm.

Furthermore, drivers of Company road vehicles being used for Company business are **STRICTLY FORBIDDEN** to use mobile phones that are not part of an in-vehicle hands-free system, or any other communication equipment which may hinder their concentration while driving.

While there remains no conclusive evidence either way, employees (particularly Company road vehicle drivers) could be at risk from serious injury as a result of mobile phones being used in areas where petrol vapours exist, such as during refuelling, whereby a mobile phone could cause such vapours to ignite. Therefore it is imperative that mobile phones are switched OFF when petroleum vapours or other inflammable gases are present.

Any abuse of this policy may result in disciplinary action being taken.

## **2-30 Work at Height**

### **2-30-1 General**

The Work at Height Regulations 2005 (as amended) requires:

- the avoidance of work at height where reasonably practicable;
- use of work equipment or other measures to prevent falls where working at height cannot be avoided; and
- where the risk of a fall cannot be eliminated, use work equipment or other measures to minimise the distance and consequences of a fall should one occur.

Work at height is anywhere where there is a risk of injury if measures required by the WAHR were not taken, such as:

- Any work at height using work equipment e.g. MEWP, tower scaffold, ladder, hop-up etc.
- Work on a roof, vehicle, machine, plant, fabrication, tree, telegraph pole etc.
- Working next to an excavation, cellar opening, lift shaft etc.
- Using harnesses, rope access, cradles etc.
- Standing on a chair/table to change a light bulb etc.

To this extent, the Company shall always comply with the Work at Height Regulations 2005 (as amended) whereby no work shall only be done at height if it is safe and reasonably practicable to do it other than at height.

## 2-30-2 Policy Arrangements – Engineers

In accordance with the Regulations, wherever a person or object could fall more than 2m engineers MUST adhere to the following Company policy:

- No person is allowed to carry out ANY work at height unless they are appropriately trained and qualified or experienced, and authorised to do so.
- No work shall be carried out at height until ALL necessary precautions have been taken to ensure the safety of all persons beneath any overhead working (engineers, contractors, tenants, visitors and the general public) including the installation of adequate and suitable means of protection.
- Edge protection must be strong and rigid enough to prevent falls of materials and people, placed, secured and used so that they cannot be accidentally displaced. The top guard-rail must be at least 950mm above the edge from which a person could fall. The gap between intermediate guard rails and any other protection must not exceed 470mm. Toe-boards must be strong enough to prevent materials and objects from falling (consider open gaps at the base of balcony railings).
- **ALL work carried out at height where there are unprotected edges MUST be undertaken wearing a personal fall restraint harness and line attached to a secure load-tested anchor point. Anyone unsure of this procedure should contact their line manager for clarification.**
- Any means of protection used must be of sufficient dimensions, strength and rigidity for the purposes for which they are being used. The means of protection should be so placed as to prevent, so far as is practicable, the fall of any person, or of any material or object, from any place of work. They should also be so placed, secured and used as to ensure, so far as is reasonably practicable, that they do not become accidentally displaced.
- Any structure or part of a structure which supports any means of protection or to which means of protection are attached must be of sufficient strength and suitable for the purpose of such support or attachment.
- In cases where an engineer has identified the potential danger of glazing falling from height, the window MUST be shut and locked IMMEDIATELY, and the occupant verbally informed it must NOT be opened until a full repair or replacement has been carried out. If possible, mark all hazardous windows with a sign clearly indicating the window must not be opened under any circumstances until repair or replacement has been completed. Adequate and suitable safe means of protection is to be used to restrain any glazing that comes away from its restraining base rail or beading and prevent it falling from height.
- Engineers must request tenants or guardians to keep all children or other vulnerable persons on the premises well clear from exposed recesses and where any overhead work activity is being carried out.
- Engineers must ensure there is unobstructed access to any window they wish to inspect or maintain. If a tenant's personal property or effects are in the way, the tenant MUST remove them to help minimise risk of tripping and subsequent fall from height.
- Dust sheets must NOT be laid on laminate or a similar slippery floor surface where there is either risk of the engineer falling from height or their impacting with glazing, the window frame or other hard surface through slipping.
- Any activity or defect relating to working at height which an engineer knows is likely to endanger the safety of themselves or another person must be reported immediately to their line manager.
- Lone working at height is STRICTLY FORBIDDEN (a work colleague or other person should always be nearby to raise the alarm in case of an emergency).
- A safety barrier system must be in place for marking out a ground level safety exclusion zone, for example hazard warning cones. (On occasion, a banksman may also be appointed to man this zone throughout the work period, using a radio transmitter/receiver for clear effective communication with engineers working overhead).
- Wrist tethers attached to handheld cordless drills must always be worn during use.
- Magnetic drill bits must be used at all times when operating handheld cordless drills.

- Lighting and ventilation should be suitable for the work being undertaken.
- It is **STRICTLY FORBIDDEN** to throw or tip any materials or objects from any height, particularly if it is likely to injure anyone.
- Materials, parts, tools and equipment must be stored in such a way as to prevent a trip hazard or risk to any person arising from the collapse, overturning or unintended movement of such items.
- Any work at height should always take account of weather conditions that could endanger health and safety, such as strong wind, fog, night-time or heavy rainfall (all work will be postponed while weather conditions endanger health or safety, and adequate checks made by the fitters to ensure there has been no deterioration in safety measures already in place).

By law, engineers must use properly the equipment and safety devices supplied or given to them, as well as in accordance with any training and instructions (unless they think that would be unsafe, in which case they should seek further instructions before continuing).

Regular management inspection shall be undertaken on jobs requiring work at height, in order to ensure safe continuity.

### **2-30-3 Safety Harnesses**

Where there is the risk of falling more than 2m, and it is not possible to erect a working platform and/or suitable fall protection, engineers shall wear an appropriate full body safety harness with attachment points and lanyard with karabiners – to be attached to the designated load-tested anchor point.

The lanyard length should be set or adjusted such that the user cannot get into a situation where fall arrest is required. This applies to fixed length, adjustable length and retractable (inertia reel) type lanyards.

Any employee required to use a safety harness or fall arrest device will be instructed on the use of the equipment. Employees are prohibited from using such equipment unless trained and authorised to do so.

*Work restraint* will be the typical personal fall protection system used within a mobile elevating work platform (MEWP) podium as most anchor points in such carriers are only rated for work restraint NOT for *fall arrest* and the effectiveness of these systems is not height dependent. If, however, fall arrest is a concern, engineers **MUST** always confirm with the MEWP manufacturer or supplier that the anchor point is suitable for the use of fall arrest equipment prior to attachment.

In accordance with HSE and PASMA recommendations, a safety harness and lanyard will NOT be used by any engineer working on a tower scaffold – correctly installed guardrails will negate their use as well as eliminate any risk of injury caused by the tower overturning in the event of an arrested fall.

A waist belt must NOT be used for personal fall protection as a full body harness will distribute any impact forces better.

It is the responsibility of the user to carefully inspect all harnesses and fall arrest devices before use.

#### **2-30-4 Stepladders and platforms (e.g. hop-ups)**

Company employees are required to adhere to the following policy:

- Stepladders should only be used for short-duration light work.
- Inspect the stepladder/platform for damage or defect prior to each use. Report any such findings to a Senior Service Engineer or relevant line manager.
- Position the stepladder/platform on a firm, even surface which is not slippery.
- Always ensure the stepladder/platform is fully open and the locking device activated before using.
- NEVER work off the top two steps (top three steps for swing-back/double-sided stepladders) unless there is a safe handhold attached to the steps.
- Do not over-reach.
- Avoid side-on working.

#### **2-30-5 Ladders**

The Company shall always comply with the Regulations' Schedule 6 'Requirements for Ladders'. Employees are therefore required to adhere to the following policy:

- Ladders can only be used if a more suitable tower is not available.
- Only light work, of short duration, is to be carried out from a ladder.
- No ladder may be used unless it is of sound construction, of the correct length, and either secured at the top, or if this is not possible, 'footed' by a colleague standing on the bottom rung.
- Ladders must NOT be positioned at or handled near live overhead cables.
- Ladders must be positioned on a solid, flat base to prevent the feet sinking into soft ground.
- The angle of the ladder should ideally be 75° to the horizontal or at a ratio of 1:4 distance away from the wall to height (1 out: 4 up).
- The top of the ladder must rest against a solid support and extend five rungs above the level of the working position to provide a safe handhold.
- Where a ladder or run of ladders rises a vertical distance of 9 metres or more above its base, there shall, where reasonably practicable, be provided at suitable intervals sufficient safe landing areas or rest platforms.
- Both hands must be used to maintain a safe hold at all times when ascending or descending a ladder – there must be three points of body contact (two hands and one foot) with the ladder at all times. However, if absolutely essential, light loads may be carried using a ladder, ensuring one hand is able to grip the ladder safely for longer than a brief moment (an appropriate tool belt is to be worn for carrying tools).
- Do not overreach. Avoid side-on working.
- Weight should be supported on the stiles, NEVER the rungs.
- Defective ladders must be reported immediately to a Senior Service Engineer, relevant Contracts Manager or Operations Manager.

All ladder and stepladder access equipment will be inspected by a manager at the quarterly Team Briefing as part of formal documented inspection checks.

When replacing existing ladders because they are damaged or unfit for further use (or simply to obtain an additional ladder), the Company shall ensure the supplier of any new ladder purchased provides a copy of the certificate of compliance with the EN131 standard (formerly BS 2037 and BS 1129 ladder standards – often referred to as Class 1 and Class 3 ladders), issued by an accredited test body such as BSI, TUV or AFNOR etc.

Furthermore, all EN131 ladders purchased shall have the correct safety labels and a set of user instructions containing comprehensive safety information, and will be to 'professional' (for use in the workplace) standard only.

### **2-30-6 Scaffold Towers**

In the event of a scaffold tower being used, the plant provider shall be required to provide the Company with a suitable risk assessment for the plant provided to ensure it is safe and in good physical working order, prior to any such work being carried out. The risk assessment shall cover all significant risks, including those brought about by the age of the equipment, its suitability for the work, and the management and maintenance regimes. A copy of the last Certificate of Thorough Examination and last maintenance report shall also be required.

Only fully trained, suitably qualified (PASMA) and experienced persons are authorised to erect and/or use a scaffold tower. Before commencing work, engineers should check the following:

1. The tower is positioned on firm, level ground and clear of any overhead cables, hazards or obstructions
2. Wheels are locked to prevent any accidental movement
3. Guardrails are fitted to the work platform
4. Outriggers, guy ropes/cables or ballast are used for stability where necessary
5. A suitable ladder is fitted to the INSIDE of the scaffold tower – climbing up the outside of the tower is STRICTLY FORBIDDEN.
6. Loads are kept to a safe weight and dimension
7. Materials, parts, tools and equipment are stored safely on the tower.

Note: The tower must NEVER be moved whilst there are people or materials still on-board.

### **2-30-7 Mobile Elevating Platforms (MEWPs)**

In the event of a MEWP being used, the plant provider shall be required to provide the Company with a suitable risk assessment for the plant provided to ensure it is safe and in good physical working order, prior to any such work being carried out. The risk assessment shall cover all significant risks, including those brought about by the age of the equipment, its suitability for the work, and the management and maintenance regimes. A copy of the last Certificate of Thorough Examination and last maintenance report shall also be required.

The plant provider will be required to provide our engineers with specific training and information concerning working at height within the MEWP. This shall be completed before any work is carried out.

The plant provider shall also be required to ensure any MEWP maintenance work undertaken at the site will only be carried out by adequately qualified and experienced persons, and that when work has finished for the day plant is removed or safely secured to prevent interference by unauthorised persons.

Before use, engineers should check the following:

1. You are IPAF trained, and authorised to work with MEWP
2. The MEWP is positioned on firm, stable ground and clear of any overhead cables, hazards or obstructions
3. Barriers are in place forming an exclusion zone to unauthorised persons entering the hazard area and to prevent the MEWP from being struck by other vehicles
4. Guardrails are incorporated into the MEWP basket (cradle)
5. Work restraint safety harnesses are being worn
6. The MEWP is not overloaded

Furthermore, MEWP must NOT be driven with the platform raised unless specifically designed to do so.

### **2-30-8 Suspended Access Equipment (SAE)**

In the event of suspended access equipment (such as a cradle) being used, the equipment provider shall be required to provide the Company with a suitable risk assessment for any SAE provided to ensure it is safe and in good physical working order, prior to any such work being carried out. The risk assessment shall cover all significant risks, including those brought about by the age of the equipment, its suitability for the work, and the management and maintenance regimes. A copy of the last Certificate of Thorough Examination and last maintenance report shall also be required.

The equipment provider shall provide any specific training and information for all engineers (who must themselves be IRATA (or similar) accredited trained) working at height within the external cradle. This shall be completed before any work is carried out.

The SAE provider shall also be required to ensure any cradles erected, maintained and dismantled will only be carried out by adequately qualified and experienced persons, and that when work has finished for the day cradles and equipment will be safely secured to prevent interference by unauthorised persons.

All engineers using suspended access equipment (SAE) will wear a suitable safety harness and short lanyard which will be attached to a designated load-tested anchor point within the SAE prior to any work carried out.

### **2-30-9 Emergency Rescue**

Where engineers are working at height within a MEWP, cradle or scaffold tower (or similar access equipment), an emergency system shall be prepared to extricate those exposed in the event of ill health or accidental injury or other emergency. The system that shall be adopted shall be determined by prevailing conditions.

### **2-31 Working at Domestic or Commercial Premises**

The Company requires its employees and contractors to always abide by any site rules (particularly procedures to be followed in the event of serious and imminent danger) undergoing site induction whenever necessary.

All employees and Company representatives shall recognise their limitations and take any appropriate action to prevent harm or ill-health to other persons. Any employee who considers they need further training relevant to the work they will be carrying out is required to discuss matters with their line manager before attending the site.

Mila Maintenance shall provide its employees and representatives with all relevant information needed for the particular work to be carried out safely and without risk to health.

It is the Company's intention to build a close relationship with all parties involved at each site to ensure the co-ordination of health and safety information. The Company shall therefore always endeavour to exchange safety information in connection with safe working, whereby it shall ensure a risk assessment/method statement (RAMS) is consented for each stage of the project.

Prior to the commencement of work on any new contract, a competent person from the Company shall physically inspect the site, any building plans and site rules beforehand, as well as obtain any relevant information to help develop and implement an induction checklist that is site-specific. Subsequently, no employee or representative of the Company shall be allowed to work on any premises knowingly comprising substantial hazards until the Company is satisfied adequate induction has been provided and that there is no significant risk involved to any person.

A tool box talk will take place prior to any work commencing (daily where necessary) to discuss with all relevant site personnel safety requirements as may be specifically required due to the works, changes to the method statement, and any significant findings as a result of relevant risk assessments being completed. They shall therefore be informed of the risks from the hazards they could be exposed to, and the measures in place to protect them from those hazards.

Should there be any doubt concerning the suitability or experience of any person involved prior to a project being undertaken, the Company shall consult professional bodies such as HSE or IOSH in order for the Company to discharge its duty under appropriate relevant statutory provisions.

Company employees and representatives should address any concerns with regard to health and safety immediately to the site health and safety officer or relevant Contract Manager if those concerns are not immediately addressed.

## **2-32 Permit to Work**

At client sites, the client may issue a Permit to Work if considered appropriate for the relevant works. At Mila's fixed-sites, however, the Company shall when appropriate operate a 'permit to work' policy for authorising activities involving specific hazards, including hot work (such as welding repair), electrical repair and maintenance and any work completed at height.

Prior to any such work starting, Mila Maintenance shall ensure suitable precautions are taken for the safety of all persons as well as completing a competency check beforehand on the person(s) carrying out the task. In any event no dangerous work shall be allowed to commence without an authorised permit.

## **2-33 Non-English Speaking Workers**

### **2-33-1 General**

The Company shall always comply with the provisions of UK race relations legislation, whereby it shall not refuse any job applicant solely on the basis they do not speak and/or understand English. However, we recognise the fact this could create a particularly high risk to their safety or health and that of others who may be affected by their work activity.

In accordance with health and safety guidelines, therefore, the Company will ensure:

- Non-English speakers work together in small manageable gangs.
- Any information provided non-English speaking employees shall be understandable and relevant to any risks identified that may cause them harm.
- For safety critical operations, instructions within technical manuals and operation/maintenance manuals shall be obtained in the target language.
- A nominated supervisor or co-worker shall stay with each gang at all times and act as their interpreter. This supervisor will have a minimum standard of health and safety training e.g. SSSTS 2-day course or equivalent, as well as being competent, trained and experienced in their particular work. Where applicable, there will be one English speaking supervisor for every five non-English speaking Company employees on site.
- The supervisor conducts site briefings, undertakes health and safety induction with gang team members, and will act as liaison officer on their behalf.
- Non-English speaking workers are NOT given a safety critical role, but ONLY provided work that is designated low risk. For example, non-English workers are PROHIBITED to undertake ANY of the following high risk work activities:
  - Work at height that requires the use of personal fall arrest equipment
  - An activity that requires a Permit to Work
  - Lone working
  - Any other activity designated safety critical by risk assessment
- Relevant pictogram signage is internationally recognised, whenever possible.

- Regular site inspection, supervision and monitoring are carried out for safety compliance.
- Further assistance is sought, when required, from an accredited interpreter or members of community group members local to the site.
- Resources are available for the provision of English lessons (such as help towards attending a college language course).

Current UK law makes it illegal to discriminate against persons at work on the grounds of their race, religion or belief (as well as gender, disability and sexual orientation). Therefore, in order to ensure the safety, health and welfare of non-English speaking employees and protect them against unfair discrimination, disciplinary action may be taken against any employee deemed to have infringed this decree.

### **2-33-2 Modern Slavery Act 2015**

Mila Maintenance is proud of its ethical position and to this extent we have a zero tolerance approach whereupon we shall not work with any organisation knowingly involved in any form of modern slavery (exploitation through a series of actions, including deceptive recruitment and coercion), namely:

- human trafficking
- forced labour
- bonded labour
- slavery

A more-detailed sub-policy covering all Group businesses is available upon request.

### **2-34 Asbestos**

Asbestos dust can kill. It can cause lung damage and cancer. The dust particles that harm are too small to be seen with the naked eye and diseases related to inhaling asbestos dust can take many years to develop. Asbestos can be found in most buildings and is used in many products such as cement sheets and tiles, tanks, gutters, down pipes, decorative finishes, insulation board, fire doors, ceiling tiles, sprayed coatings, insulation and lagging to pipe work and plant, caulking materials, and fire protection materials. Therefore, to protect its employees and visitors from exposure, the Company shall always comply with the Control of Asbestos Regulations 2012 (as amended).

Prior to any of its engineers commencing work on a new contract, the Company shall, where reasonably practicable, inspect building plans and/or obtain any information which may show if asbestos-containing materials (ACMs) are present. Subsequently, no employee shall be allowed to work on premises knowingly comprising ACMs until the Company is satisfied adequate control measures are in place, and that there is no significant risk involved to any person.

Likewise, the Company shall at all times ensure ACMs are clearly labelled and in good condition, and always endeavour to prevent employees coming into direct contact with them. However, should any person discover or encounter ACMs, or believe they may have been exposed and/or contaminated with asbestos material, the following procedure MUST be followed:

1. STOP WORK IMMEDIATELY.
2. Do NOT disturb any suspect material.
3. Make sure work colleagues and all other persons in the vicinity are made aware of the location of the suspect material.
4. Raise the alarm by getting someone else to report the incident to a Contracts Manager or Operations Manager immediately (or deputy in his absence) or the person in charge.
5. Do NOT go into occupied areas until help arrives as this can spread asbestos contamination.
6. Wear respiratory protective equipment if accessible.

7. Wait for further instruction.
8. On no account take the clothes you were wearing at the time of the incident home with you or out of the area.

## **2-35 Fire Safety and Emergency Procedure**

The Company shall comply with the Regulatory Reform (Fire Safety) Order 2005 (as amended), the Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) 2002 (as amended) and other supporting current legislation concerning fire safety.

A "fire plan" of Company premises showing areas of high risk, location and type of fire-fighting equipment, and location of manual alarm call points and exit routes has been developed and placed in prominent places around the premises as well as on the main notice board. Master copies can also be found contained within the Loss Prevention Manual alongside emergency evacuation precautions.

### **2-35-1 Fire Safety Training**

Mila Maintenance will ensure all employees are provided with adequate fire safety training. In accordance with the Reform Order, this will take place:

- During induction i.e. when they are first employed by the Company
- On their being exposed to new or increased risks through being given a change of responsibilities
- On the introduction of new work equipment or a change in respect of work equipment already in use
- On the introduction of new technology
- On the introduction of a new system of work or a change in respect of a system of work already in use

All training shall:

- include suitable and sufficient instruction and training on the appropriate precautions and actions to be taken by the employee in order to safeguard themselves and other relevant persons on the premises
- be repeated periodically where appropriate
- be adapted to take account of any new or changed risks to the safety of the employees concerned
- be provided in a manner appropriate to the risk identified by the risk assessment

As part of Mila Maintenance's induction programme, all new employees shall receive suitable and sufficient training and instruction in fire safety, including:

- ❖ Basic principles of fire safety awareness
- ❖ Understanding the fire alarm system
- ❖ How to raise the alarm
- ❖ Emergency evacuation procedures
- ❖ Types of fire extinguisher on the premises
- ❖ Keeping emergency walkways, routes and exits clear of obstruction
- ❖ Location of the Fire Assembly Point
- ❖ Safe use and storage of flammable substances

The Company shall always endeavour to train employees in the physical use of fire-fighting equipment.

The Company shall ensure there are always a sufficient number of fire wardens on site who are trained and available to implement emergency evacuation procedures.

Any staff with learning difficulties or mental illness will be told what they should do in the event of fire.

## **2-35-2 Fire Safety Responsibility**

The Managing Director has the overall responsibility for the Company's fire safety and emergency policy and training. It is **every** employee's responsibility, however, to report immediately any situation that could endanger themselves or other persons. Employees must bring to the immediate attention of their line manager therefore, any potential fire hazards that they become aware of.

### **Responsibilities of the Fire Marshal(s)**

It is the responsibility of the trained Fire Marshal(s) to:

- Have each manual fire alarm call point tested at least every 13 weeks.
- Test any smoke detection equipment on a weekly basis.
- Test any emergency lighting monthly.
- Have all fire doors, fire-fighting equipment, and alarm equipment serviced annually by a competent person.
- Review escape routes and access to the premises if people with impaired mobility, disability or other impairments use the workplace regularly.
- Ensure the number of trained or experienced personnel is adequate for the effective and safe evacuation of all persons from the premises.
- Have full knowledge of the types, positions and use of fire-fighting equipment and first-aid kits located within the premises.
- Ensure all employees are aware of the location of fire-fighting equipment and first aid kits.
- Ensure fire safety tours are carried out on a regular basis.
- Conduct emergency evacuation drills in accordance with risk assessment recommendations.
- Ensure all employees are aware of fire drill and emergency evacuation procedure.
- Monitor compliance to the Company's *no smoking* policy.

### Daily Duties:

It is the responsibility of the Fire Marshal(s) to:

- Check fire exits are kept clear inside and out.
- Ensure fire extinguishers are in their correct location and accessible.
- Fire Call Points are free from obstruction.
- Ensure any fire hazard is promptly dealt with.

### On hearing the Fire Alarm:

It is the responsibility of the Fire Marshal(s) to:

- Go to the Alarm Panel to begin emergency procedure.
- Using the alarm panel zone map, identify which zone has activated the alarm.
- Call emergency services unless a false alarm has been reported and confirmed to them.
- Ensure all staff/visitors are evacuating the building.
- Where possible close any office doors left open during evacuation.
- Leave the building through the nearest available exit and proceed to designated assembly point.
- Initiate a roll call and determine whether all persons are accounted for – if not, identify who is missing.
- Liaise with the Fire Brigade upon their arrival, informing them:
  - Which zone the activation occurred in.
  - If there are persons known to be inside the building.
  - If there are any persons unaccounted for.
  - Confirm what hazards may be on the premises.
- Record details and findings of all evacuations (emergency or drill) in the *Fire Log*.

### **2-35-3 Fire Safety Risk Assessment**

Fire safety risk assessments will be completed on a regular basis as required under the Management of Health and Safety at Work Regulations 1999 (as amended), and the Regulatory Reform (Fire Safety) Order 2005 (as amended). The purpose of fire risk assessment is to:

- identify safety and health hazards in and around the premises
- identify persons and groups of persons who might be in danger
- evaluate the risks arising from the hazards and assess whether the existing preventive and protective measures are adequate or whether additional measures are required
- record all significant findings
- inform all personnel of any hazards and related risks they were not already aware of
- identify staff training requirements (including for new procedures)

All employees shall be made aware of the contents, findings, and subsequent recommendations made in all risk assessments.

### **2-35-4 Fire Detection System**

The Company will, where possible, ensure office premises contain a fire detection system made up of smoke and heat detectors. These will detect the effects of a fire and give prior warning to all personnel within the building by sounding a siren so as to warn the presence of a fire. To enable correct performance, employees are requested to ensure there is a gap of at least 800mm below each detector.

These detection devices will, in accordance with legislation, be tested on the following basis:

- Weekly: Test operation of system (control panel).
- Test individual manual alarm call points on a weekly rotation basis. Repair or replace defective beacons or call point unit.
- Monthly: Test operation of each self-contained smoke alarm. Repair or replace any defective unit.
- Quarterly: Each manual alarm call point should be tested every 13 weeks.
- Annually: Full check and test of system by competent service engineer.

### **2-35-5 Manual Alarm Call Points**

The Company's fixed-site premises shall contain a number of manual alarm call points identified by clear signage and contain the words "Break Glass" (or similar wording). When activated, the fire alarm system will sound, giving prior warning to all personnel within the building, thereby allowing them sufficient time to escape the premises.

Any fire call point will be tested every week and results recorded. The fire call point system shall be tested every 6 months by a trained competent person.

### **2-35-6 Fire Doors, Exits and Escape Routes**

In accordance with fire safety legislation, the Company will ensure:

- Persons can evacuate office premises as quickly and as safely as possible.
- The number, distribution and dimensions of emergency routes and exits installed are adequate, having regard to the use, equipment and dimensions of the premises and the maximum number of persons who may be present there at any one time.
- All escape routes lead to a place of safety.
- All escape doors open in the direction of travel/escape.
- Emergency routes and exits are clearly indicated by appropriate pictogram signage.

Employees are required to ensure all specified means of escape from the Barnsley Unit, Folkestone Office and Ashford Depot premises, such as exit doors and corridors, are kept free of obstruction at all times and never left open.

### **2-35-7 Emergency Lighting**

Emergency routes and exits requiring illumination shall be provided emergency lighting of adequate intensity in the case of failure of their normal lighting. Any emergency lighting will, in accordance with legislation, be tested on the following basis:

- Weekly: Visual inspection of lighting units for condition and state of repair.
- Monthly: Test individual units for working order.
- Annually: Full check and test of system by competent service engineer.

The emergency lighting will be tested by switching off the power to simulate a failure. Results of each test will be recorded and filed.

### **2-35-8 Non-Automatic Fire Fighting Equipment**

The Company will ensure there is sufficient number of fire extinguishers located close to hazard areas throughout its office premises. Each fire extinguisher will be adequately maintained, serviced annually by a competent person, and shall meet the minimum fire safety requirements. Each fire extinguisher shall have a sufficient capacity to aid fire-fighting in an emergency, and shall be easily accessible, without obstruction, and clearly identified by signs.

Calendar schedules are set for the 12 monthly servicing of all Fire Appliances the Company is in possession of. Inspection, service and maintenance records are kept by Tristan Cooke.

To comply with BS5306, each fire extinguisher shall be hung securely on wall brackets (1metre from floor) or sited upon suitable base plates if possible (preferably not on the floor).

Each engineer will be provided with a dry powder extinguisher (with a rating of at least 8A/34B/C), which must be kept in their vehicle in a secure location with easy access i.e. free from obstruction.

### **2-35-9 Fire Action and Evacuation Procedures**

Employees shall, during their induction, be informed of procedure to be followed in the event of a fire. Likewise, all visitors to the Company's offices will be provided details of evacuation procedure upon their arrival at reception. In support of all this, written instructions on fire and emergency procedures are displayed throughout Company premises.

The Company's fire action and emergency evacuation procedure is:

On discovering a fire –

1. Any person discovering a fire should raise the alarm by operating the nearest manual alarm call point.
2. The Office Manager (or designated deputy) will immediately telephone the fire brigade.
3. The person discovering the fire may attempt to tackle it using the correct fire-fighting appliance, unless there is any doubt that the fire cannot be extinguished immediately without risk or injury to themselves or other persons, or the fire is beyond obvious control and endangers life, and provided they have been adequately trained to use non-automatic fire-fighting equipment.
4. If unable to tackle the fire safely, leave the building IMMEDIATELY using the nearest emergency escape route, switching off any equipment if circumstances allow.

Do NOT collect your personal belongings along the way – any delay can be fatal.

5. Fire Marshals shall ensure the premises have been completely evacuated prior to leaving the building themselves.

6. ALL persons (including visitors) will report to the designated evacuation assembly point.

7. NO person shall be allowed to re-enter the premises until permission to do so has been granted by the fire brigade's most senior co-ordinating officer.

On hearing the fire alarm –

1. Leave the building IMMEDIATELY using the nearest emergency escape route and exit (look for the green signs clearly marked by a 'rapidly walking man').

2. Do NOT attempt to collect your belongings along the way – any delay can be fatal.

3. Once outside, move away from the building, keeping access routes clear for emergency services vehicles.

4. Proceed to the designated evacuation assembly point.

5. Do NOT re-enter the premises until permission to do so has been granted by the fire brigade's most senior co-ordinating officer.

Employees must be aware that visitors may include disabled persons needing assistance to leave the premises and that people using toilets or other ancillary rooms may not be aware of the emergency. Under these circumstances, the Company will have in place suitable procedure to ensure those needing assistance shall receive it (see also **2-35-13 Vulnerable Persons** below), and that all ancillary rooms will be safely vacated of persons.

### **2-35-10 Client-site Fire and Emergency Procedures**

Following site specific risk assessments, fire and emergency procedures will be formulated for each location. However, employees must always ensure they familiarize themselves with the relevant site's emergency exit routes and evacuation procedure before starting work. If in doubt ask the most senior manager at the site for clarification.

### **2-35-11 Discovery of Explosives, Bombs, or Suspicious Packets**

On discovery, the following procedure must be adhered to:

1. DO NOT touch anything suspicious
2. Inform a manager immediately.
3. Before leaving the immediate area, take all necessary measures so that nobody, even mistakenly, comes into contact with the dangerous object before the arrival of the police.
4. Assemble at the designated emergency assembly point.

### **2-35-12 Fire Drills**

Fire evacuation drills are scheduled randomly and will take place within the Company's office buildings without notice. In accordance with Company health and safety policy, employees are required to follow fire evacuation procedure immediately the alarm is activated. Fire evacuation registers will be taken and signed by the designated trained Fire Marshal and the results forwarded to the Managing Director.

Evacuation drill shall be observed by a nominated competent person who will record his/her findings, the results of which shall also be forwarded to Mark Needham for analysis, who will then decide if any remedial action is to be taken, such as refresher training.

Fire drills shall be carried out twice-yearly in accordance with risk assessment and Group policy.

### **2-35-13 Vulnerable Persons**

The Company shall review escape routes and access to the premises if people with impaired mobility, disability or other impairments use the workplace regularly. In these circumstances, a log book shall be implemented to record details of disabled persons on the premises, including their respective disabilities and requirements in case of an emergency. As part of a personal emergency evacuation plan (PEEP), it will be discussed and agreed with the relevant disabled employee how they will leave the building in the event of an emergency evacuation. Also when applicable, any staff with learning difficulties or mental illness will be told what they should do in the event of fire.

In the event of a disabled visitor to a fixed-site requesting an evacuation chair as a method of escape, the appropriate responsible person will be contacted to arrange for one to be brought into the building for the duration of their stay.

Disabilities can sometimes be less obvious and employees are therefore required to be vigilant in an emergency so that help can be given to those persons who need it most.

### **2-35-14 Combustible Materials and Ignition Sources**

The Company believes prevention is better than cure when it comes to fire safety, and one of the most important areas of fire prevention is to keep combustible materials to a minimum and to isolate them from ignition sources.

Employees are required, therefore, to comply with the following policy:

- All sources of ignition must be kept at least 4metres away from where flammable substances or combustible materials are located, dispensed or used.
- All heaters (other than radiators) and burners shall be fitted with suitable guards and fixed in position away from combustible materials.
- Flammable substances must be kept in containers fit for the purpose, and clearly labelled. Containers must be safely stored so as not to put at risk any means of emergency escape.
- All flammable substances must be kept in cool, dry, ventilated and secure storage areas when not in use, particularly during hot weather.
- Flammable substances must be kept in fire-resisting stores or cabinets when not in use.
- Flammable substances which are stored within work areas must be kept to a minimum i.e. no more than a half-day's supply. (Note: small amounts of flammable liquid (not exceeding 50litres) may be stored in work rooms in a fire-resisting cupboard or bin).
- Flammable substances must be stored at ground level
- Flammable substances must NOT be dispensed within their storage area.
- Flammable substances must not come into contact with hot surfaces.
- All spillages of flammable substances must be cleared up as soon as possible.
- Flammable/combustible waste must not be allowed to accumulate within the work area and should be disposed of safely and of benevolence to the environment.
- Faulty electrical equipment is a common source of fire breaking out. All electrical equipment not in use, therefore, must be switched off and any defect reported to the relevant Contracts Manager or Operations Manager immediately.
- Paper, textile, or similar, decorations hung in the building at various time during the year (e.g. celebratory bunting, Christmas decorations etc.) shall be kept to a minimum and away from any source of ignition.

In any circumstance, all employees must conduct their daily tasks in such a way as to minimise the risk of fire.

### **2-35-15 Smoking / electronic cigarette use**

The Smoke-free (Premises and Enforcement) Regulations 2006 imposes a duty on the Company to prevent smoking from taking place within its enclosed premises. It is the policy of Mila Maintenance therefore, that smoking is strictly prohibited in ALL areas of the Company's office premises (buildings and yards).

The following persons are also prohibited from smoking at any time:

- Drivers and their passengers whilst using Company vehicles for business purposes
- Any employee or contractor operating on behalf of the Company when working at domestic premises
- Any employee or contractor operating on behalf of the Company when working off-site (but only during their work shift hours)

While electronic cigarettes (also known as electronic nicotine delivery systems (ENDS)) are currently Health Act 2006 exempt, it is nonetheless the policy of Mila Maintenance that the use of e-cigarettes is PROHIBITED in ALL areas of the Company's work premises (buildings and yard) at Barnsley Unit, Folkestone Office and Ashford Depot, as well as for drivers and their passengers whilst using Company vehicles for business purposes.

### **2-35-16 Gas**

If a smell of gas is detected:

1. Open all doors and windows immediately and report the occurrence to a Senior Service Engineer or line manager.
2. If a gas leak can be stopped safely by turning off a known source by means of a gas tap then do so.
3. DO NOT USE A NAKED FLAME NEAR ANY SOURCE OF GAS.
4. Do not enter a confined space where dangerous/explosive gases may be present until proved safe to do so. If in doubt, consult your line manager.

### **2-35-17 Arson**

To protect against any potential arson attack at its office premises, Mila Maintenance has in place anti-crime measures, such as secure boundaries (e.g. intruder-resistant external doors), security lighting, intruder alarm system, business park patrols by security personnel and controlled access to ensure that only authorized people enter the Company's buildings.

## GLOSSARY OF TERMS

“accident” means an undesired event that results in injury and/or property damage. In relation to RIDDOR, an accident is a discrete, identifiable, unintended incident which causes physical injury.

“accident investigation” means the process of systematically gathering and analyzing information about an accident. This is done for the purposes of identifying causes and making recommendations to prevent the accident from happening again.

“ACMs” means asbestos-containing materials.

“banksman” means operatives trained to direct vehicle movement on or around site, or to direct pedestrians around a safety zone away from overhead work.

“bonded labour” (in reference to modern slavery) is demanded as a means of repayment of a debt or a loan.

“CE marking” or formerly EC mark, is a mandatory conformity marking for certain products sold within the European Economic Area (EEA) since 1993. It is a manufacturer's declaration that the product meets the requirements of the applicable European Community directives.

“child” means a person who is not over compulsory school age, interpreted in accordance with section 8 of the Education Act 1996. Related expressions (including “children”) are to be interpreted accordingly.

“combustible material” means any substance that can be burned to give off heat. These materials will ignite and burn if exposed to a flame or a source of ignition. In general, combustible and flammable materials are construed as being the same.

“(the) Company” means Mila Maintenance. “company” means a commercial business.

“competent person” is a person who has specific training and experience, or knowledge, or other qualities, to enable him/her to carry out the defined task properly.

“confined space” means a space in which a hazardous gas, vapour, dust or fume may collector in which oxygen may be used up because of the construction of the space, its location, contents, or the work activity carried out in it. It is an area which is not designed for continuous human occupancy and has limited opening for entry, exits or ventilation.

“construction work” means a process that consists of the building or assembling of infrastructure.

“contractor” means any company that undertakes a contract to provide a service or carry out work for the Company.

“contract worker” means an employee of the contractor.

“control measures” – see “further control measures” below.

“COSHH” means the Control of Substances Hazardous to Health regulations.

“dangerous substance” – means a substance or preparation which is explosive, oxidising, extremely flammable, highly flammable or flammable; a substance or preparation which because of its physico-chemical or chemical properties and the way it is used or is present in or on premises creates a risk; and any dust, whether in the form of solid particles or fibrous materials or otherwise, which can form an explosive mixture with air or an explosive atmosphere.

“dermatitis” means an inflammation of the skin, also called eczema. It causes red, itchy skin which may also blister and is often caused by direct contact with a substance which irritates the skin.

“disabled person” – disability is the consequence of an impairment that may be physical, cognitive, mental, sensory, emotional, developmental, or some combination of these and the related expression “disabled person” is to be interpreted accordingly.

“domestic premises” means premises occupied as a private dwelling.

“DSE” means display screen equipment.

“electrical equipment” includes anything used, intended to be used or installed for use, to generate, provide, transmit, transform, rectify, convert, conduct, distribute, control, store, measure or use electrical energy.

“employee” means a person who is or is treated as an employee for the purposes of the Health and Safety at Work etc. Act 1974 and related expressions (such as “engineer”, “office staff” and “worker”) are to be interpreted accordingly.

“environment” means the natural environment in which we work comprising all living and non-living things that occur naturally. The environment may also include the built environment.

The scope of “equipment” is extremely wide. Equipment includes single machines such as a chop saw, grinder or photocopier, tools such as a portable drill or a hammer, and apparatus such as a pallet truck. In addition to individual items of equipment, any assembly arranged and controlled to function as a whole is included.

“explosive atmosphere” means a mixture, under atmospheric conditions, of air and one or more dangerous substances in the form of gases, vapours, mists or dusts in which, after ignition has occurred, combustion spreads to the entire unburned mixture.

“first aid” means the immediate aid provided to a sick or injured person to preserve life, prevent further injury and promote recovery.

“fixed-site” refers to Barnsley Unit, Folkestone Office, Ashford Depot.

“flammable substance” means any substance liable to catch fire (see “combustible material” above).

“forced labour” is any work or services which people are not doing voluntarily, and which is exacted under a threat of some form of punishment.

“fragile surface” means a surface that does not safely support the weight of a person and any load they are carrying. The fragility of a roof does not depend solely on the composition of the material in it.

“further control measures” means the measures which have been identified by the Company in consequence of assessment as the measures needed to be taken to eliminate or reduce risk as much as possible. Related expressions (including “control measures”) are to be interpreted accordingly.

“Hand-arm vibration (HAV)” is transmitted from work activities (such as operating hand-held power tools or by holding materials being processed by machines, for example grinders) into workers’ hands and arms. “Hand-arm vibration syndrome” or “HAVS” are to be interpreted accordingly.

“HASW” is the Health & Safety at Work etc. Act 1974.

“hazard” is anything that has the potential of something to cause harm. “hazardous” shall be interpreted accordingly.

“hazardous substance” – The COSHH Regulations apply to any substance for which an indication of danger is specified, including:

- Any preparation (mixture) that is dangerous for supply.
- Any substance which has a Workplace Exposure Limit (WEL).
- Any biological agents used at work.
- Any dust other than one with a WEL at a concentration in air above 10 mg/m<sup>3</sup> averaged over 8 hours, or any such respirable dust above 4 mg/m<sup>3</sup> over 8 hours.
- Any other substance that creates a risk to health because of its properties and the way it is used or is present in the workplace.

“health surveillance” means systematically watching out for early signs of work-related ill health in employees exposed to certain health risks, such as hazardous substances or excessive noise.

“HSE” means the Health and Safety Executive, a public body in the UK responsible for the encouragement, regulation and enforcement of workplace health, safety and welfare, and for research into occupational risks.

“human trafficking” is a process of bringing a person into a situation of exploitation through a series of actions, including deceptive recruitment and coercion.

“hygiene” means the practice of keeping yourself and your surroundings clean, especially in order to prevent the spread of disease.

“ignition source” means a flame, spark or hot surface capable of igniting flammable vapours or fumes, or any substance capable of burning.

“incident” – an event or condition that doesn’t cause harm but has the potential to do so. These events may sometimes be recorded as “near misses”.

“ladder” includes a fixed ladder and a stepladder.

“LEV” means local exhaust ventilation, a form of ventilation which encloses the material, equipment or process as much as possible and ensures air flow into the enclosure and away from the worker and workspace.

“lone worker” mean those who work by themselves without close or direct supervision. “lone working” shall be interpreted accordingly.

“manual handling” means any transporting or supporting of a load (including the lifting, putting down, pushing, pulling, carrying or moving thereof) by hand or by bodily force.

“manufacturer’s safety data sheet” means a safety data sheet providing general guidance and information as to health and safety based upon the manufacturer’s knowledge of the handling, storage and use of a specific product. Also known as “material safety data sheet”.

“method statement” means a document detailing how a particular process will be completed and is commonly used to describe how construction/installation works can be carried out safely.

“MEWP” means mobile elevating work platform e.g. scissor or boom lift

“near miss” – see “incident” above.

“new or expectant mother” means an employee who is pregnant or who has given birth within the previous six months or who is breastfeeding.

“noise” means any audible sound.

“occupational health” regards the effect work has on health and is about making sure that employees are fit for the work they do.

“off-site” means premises or locations away from Barnsley Unit, Folkestone Office or Ashford Depot, the Company’s main premises of work.

“Permit to Work” means a formal, written procedure used to control work activities which are identified as particularly hazardous and where special precautions are required to control the hazards. Primarily used for non-routine work activities.

“personal fall protection system” means –

(a) a fall prevention, work restraint, work positioning, fall arrest or rescue system, other than a system in which the only safeguards are collective safeguards; or

(b) rope access and positioning techniques.

“personal protective equipment” means all equipment which is intended to be worn or held by a person in or on premises and which protects that person against one or more risks to their safety, and any addition or accessory designed to meet that objective; any device or appliance designed to be worn or held by an individual for protection against one or more health and safety hazards.

“pictogram” means a graphic symbol that conveys its meaning through its pictorial resemblance to a physical object.

“place of safety” in relation to premises, means a safe area beyond the premises.

“platform” means any platform used as a place of work or as a means of access to or egress from a place of work and includes any scaffold, suspended scaffold, cradle, mobile platform, trestle, gangway, gantry and stairway which is so used.

“policy” – this is a statement of commitment by the Company’s senior management to comply with health and safety law and meet ethical and professional responsibilities for health and safety.

“pollution” is the release of harmful substances or energy into the environment. It can contaminate air, land and water.

“PPE” – see “personal protective equipment” above.

“premises” includes any place, including any workplace and any installation on land.

“preparation” means a mixture or solution of two or more substances.

“procedure” means a course of action incorporating the method and order followed in completing it.

“project” means a plan, scheme, proposal, or undertaking which includes or is intended to include construction work, and comprises all planning, design, management or other work involved in such enterprise until the end of the construction phase.

“PUWER” means the Provision and Use of Work Equipment Regulations.

“RAMS” means risk assessment/method statement, whereby a risk assessment is undertaken to identify risks and the method statement subsequently outlines the hazards involved, detailing a step by step guide on how to do the job safely (see also “safe system of work”). It will also detail which control measures are to be introduced to ensure the safety of everyone who is affected by the task or work process.

“reasonably practicable” – To carry out a duty so far as is reasonably practicable means that the degree of risk in a particular activity or environment can be balanced against the time, trouble, cost and physical difficulty of taking measures to avoid the risk.

“regulation” means a statutory device made under a general provision that is contained in an act of parliament. Regulations themselves are approved by parliament and are generally absolute legal standards.

“resources” – a means of help or support when needed.

“responsible person” means

(a) in relation to a workplace, the employer, if the workplace is to any extent under his control.

(b) in relation to any premises —

(i) the person who has control of the premises (as occupier or otherwise) in connection with the carrying on by him of a trade, business or other undertaking (for profit or not); or  
(ii) the owner, where the person in control of the premises does not have control in connection with the carrying on by that person of a trade, business or other undertaking.

In short, this is the person who has overall responsibility for the control of the premises in connection with the business.

“review” – an evaluation of systems in place through survey and inspection compared with performance achieved.

“RIDDOR” means the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations.

“risk” is the chance, high, medium or low, that somebody could be harmed by a hazard. It is the combination of the likelihood of a hazardous event occurring and the consequence of the event

“risk assessment” is a careful examination of what, in your work, could cause harm to people and is a means of making sure that the most serious risks are managed by cost-effective control measures.

“root cause” means the real or underlying cause of an event, as distinguished from the immediate cause or causes which are usually fairly obvious.

“RPE” means respiratory protective equipment.

“safe system of work” and “SSOW” pertains to a formal procedure that results from the systematic examination of a task in order to identify all the hazards. It defines safe methods of working to ensure that hazards are properly controlled.

“senior management” means the persons who play significant roles in—

(i) the making of decisions about how the whole or a substantial part of its activities are to be managed or organised, or

(ii) the actual managing or organising of the whole or a substantial part of those activities.

“slavery” is a situation where a person exercises (perceived) power of ownership over another person.

“SNR” is the number of potential decibels the hearing protection will reduce the noise level by if fitted correctly.

“SSSTS” means Site Supervisor Safety Training Scheme.

“substance” means any natural or artificial substance whether in solid or liquid form or in the form of a gas or vapour.

“substance hazardous to health” – see “hazardous substance” above.

“suitable” means suitable in any respect which it is reasonably foreseeable will affect the safety of any person.

“toolbox talks” means short, focused sessions that address a specific topic, such as how to do deal with asbestos in the workplace. They are not a substitute for formal training sessions but are meant as a reminder or refresher on the safety aspects of one particular area.

“traffic route” means a route for pedestrian traffic or for vehicles and includes any doorway, gateway, loading bay or ramp.

“use” in relation to work equipment means any activity involving work equipment and includes starting, stopping, programming, setting, transporting, repairing, modifying, maintaining, servicing and cleaning.

“ventilation” means the movement of air to allow fresh air to circulate.

“WAHR” means the Work at Height Regulations 2005 (as amended).

“WELs” means workplace exposure limits, which are set under COSHH in order to help protect the health of workers. They are the maximum concentration of an airborne substance, averaged over a reference period, to which employees may be exposed by inhalation.

“work at height” means -

- (a) work in any place, including a place at or below ground level.
- (b) obtaining access to or egress from such place while at work, except by a staircase in a permanent workplace, where, if measures required by the Working at Height Regulations 2005 were not taken, a person could fall a distance liable to cause personal injury.

“work(ing) day” / “work shift” means a daily working period, irrespective of the time of day when it begins or ends, and of whether it begins or ends on the same calendar day. Related expressions are to be interpreted accordingly.

“workplace” means any premises or parts of premises or site used for the purposes of the Company’s undertaking and which are made available to an employee of the Company as a place of work and includes—

- (a) any place within the premises to which such employee has access while at work; and
- (b) any room, lobby, corridor, staircase, road, or other place used as a means of access to or egress from that place of work; or where facilities are provided for use in connection with that place of work, other than a public road.

“workplace monitoring” means a practice that involves maintaining regular observation on activities and conditions in a workplace in order to safeguard employees and visitors.

“young person” is defined by The Management of Health & Safety at Work Regulations as someone between 16 & 18 years of age. Special provision is made to recognise their physical and psychological capacity and to protect them from harmful exposure to toxic and carcinogenic agents, radiation, risks from extreme heat or cold, excessive noise and vibration.

**Disclaimer:**

*Whilst every effort has been made to ensure the accuracy of the information contained in this glossary, opinion may vary regarding some concepts. Employees should therefore take steps to verify interpretations to their own satisfaction if there is doubt.*

## HEALTH AND SAFETY POLICY

Signed: *T Cooke*

Tristan Cooke, Managing Director

Date of Review: 11<sup>th</sup> January 2018

Date of Next review: 10<sup>th</sup> January 2019

AMENDMENTS			
Date	Reason for amendment	Name of person making changes	Job-role
14 May 2018	p.46: Text added to specify ladder check arrangements – “All ladder and stepladder access equipment will be inspected by a manager at the quarterly Team Briefing as part of formal documented inspection checks.”	Mark Needham	External health and safety advisor
14 May 2018	p.29: Text added to specify paper shredding security arrangement – “Note: ALL obsolete, discarded and other such unrequired paper document(s) MUST be shredded in accordance with the Company's security procedure.”	Mark Needham	External health and safety advisor

END