



**Company Health and Safety Policy Manual
2016**

CONCEPT METAL PRODUCTS LTD

**Concept Metal Products Co. Ltd
Mills Hill Road
Middleton,
Manchester
M24 2EF**

**Tel 0161 643 2931
Fax 0161 655 3554**

PERSONS RESPONSIBLE FOR HEALTH AND SAFETY:

**Maintenance Manger: Andy Galvin
General Manager: Dean Barnard**

**Contracted Health and Safety Consultant: Richard Smith OTC
Consultancy Ltd**

**CONCEPT METAL PRODUCTS LTD
COMPANY HEALTH AND SAFETY POLICY MANUAL
INDEX OF CONTENTS**

Section	Subject	Page Number
1.0	Written Health and Safety Policy Statement of Intent and Policy Review Procedure	3
1.2	Risk Identification	4
1.3	Eliminating or Controlling Risks and Method Statement	5
1.4	Monitoring	5
1.5	Control of Substances Hazardous to Health	6
1.6	Authority & Responsibility	10
1.7	Resources	11
2.0	Accident Reporting & Recording	12
3.0	Management, Staff & Employee Training	15
4.0	Personal Protective Equipment & Clothing	15
5.0	Control of Chemicals & Hazardous Substances	16
6.0	Machine Guarding and Safety Devices	18
7.0	Use and Maintenance of Ladders	18
8.0	Fire Precautions in the Workplace	19
9.0	General Housekeeping	19
10.0	Control of Contractors Attending the Premises	20
11.0	High Hazard Operations	21
12.0	General Company Rules	21
13.0	Disciplinary Procedures	21
14.0	Emergency Procedures	21
15.0	First Aid Facilities	23
16.0	Lifting Operations Lifting Equipment Regulations 1998 (LOLER)	23
17.0	Provision and Use of Work Equipment Regulations 1998 (PUWER)	24
18.0	Health and Safety (Display Screen Equipment) Regulations 1992 (Amended 2002)	25
19.0	Health and Safety of Young Persons	25
20.0	Consultation with Employees	27
21.0	The Work At Height Regulations 2005 (As amended 2007)	27
22.0	The Control of Vibration at Work Regulations 2005	31
23.0	Stress at Work	34
24.0	Occupational Dermatitis	35
25.0	Control of Asbestos	37
26.0	Welfare Arrangements	40
27.0	Company Vehicle Road Safety	43
28.0	Manual Handling Operations	44
29.0	Electricity at Work	46
Appendix 1	Environmental Policy	50-56
Appendix 2	Equal Opportunities Policy	57
Appendix 3	Drugs & Alcohol Policy	58-59
Appendix 4	H&S Advisor CV	60-64

CONCEPT METAL PRODUCTS LTD COMPANY HEALTH AND SAFETY POLICY MANUAL

1:1. WRITTEN COMPANY HEALTH AND SAFETY POLICY MANUAL:

- 1:1:1. This is the written policy statement of Concept Metal Products Ltd, with regard to health, safety and welfare at work, as required under the Health and Safety at Work Act 1974, section 2(3), and is relevant to all company employees in all areas where the company undertakes its operational and contractual business commitments.
- 1:1:2. The company fully recognises that it is the essential and paramount objective of Concept Metal Products Ltd to ensure that every reasonably practicable measure is taken in order to ensure the health, safety and welfare of all of its employees.
- 1:1:3. The company also fully recognises its duties and responsibilities, with regard to developing the capacity to undertake the following:-
- a. To identify all foreseeable risks or hazards at the earliest possible time, by the compiling of a fully detailed general and specific task risk assessment record, and by constantly monitoring the effectiveness of this compiled general and specific task risk assessment record, with regard to any new risks or hazards that may become apparent.
 - b. To eliminate, wherever it is reasonably practicable to do so, all identified risks or hazards that will affect its employees. In the event of this not being reasonably practicable, to control all risks and hazards that will affect its employees, by providing fully detailed information, instruction, training, supervision and operating under safe systems of work conditions at all times, for offices, sites, plant, machinery and all other equipment in use, to ensure, so far as is reasonably practicable, the Health, Safety and Welfare of all of its employees, and to consult with external professional bodies in order to maintain a safe working environment.
 - c. To constantly monitor information, instruction, training, supervision and operating safe systems of work conditions, to ensure that offices, sites, plant, machinery and any other equipment in use under its control, are maintained in a condition that is, as far as is reasonably practicable, safe and without risk, within the meaning of the Health and Safety at Work Act 1974.
 - d. To fully encourage consultation and co-operation between employees and management with regard to all aspects of health, safety and welfare and to ensure that all employees are fully aware of their responsibilities under Section 7 of the Health and Safety at Work Act etc. 1974.

The Company Maintenance Manager is the person responsible for health, safety and welfare within the company. The Company Maintenance Manager is also responsible, as far as is reasonably practicable, for ensuring that adequate resources are made available for the purpose of health, safety and welfare within the company, thereby maintaining a safe, effective and efficient working environment.

Signature: *A. Galvin*

Date: 2nd February 2016

Name in Print: **ANDY GALVIN**

Position in Company: **Maintenance Manager**

Policy Review Date: **Feb 2017**

CONCEPT METAL PRODUCTS LTD

COMPANY HEALTH AND SAFETY POLICY MANUAL

1:2. IDENTIFYING RISKS AND HAZARDS:

At the planning stage of any contractual agreement undertaken by Concept Metal Products Ltd, specific attention must be paid to the required activities to be undertaken and the foreseeable risks or hazards that may be either apparent, or could become apparent, with regard to the undertaking of such activities. The Company Maintenance Manager, must undertake a fully detailed planning stage health and safety survey of the potentially contractual agreement sites, inclusive of compiling a fully detailed survey report and construction health and safety plan, to be distributed to all potential clients, once the contract has been accepted by Concept Metal Products Ltd. This is a legal requirement under the Health and Safety at Work etc. Act 1974, Management of Health and Safety at Work Regulations 1999 (As Amended 2006) and also inclusive of the Construction (Design and Management) Regulations 2015.

1:2:2. With regard to the assessment of any risks or hazards that may be foreseeable, the following items must be considered:

- a. The professional opinion of the Contracted Health and Safety Consultant, who has detailed practical experience of the required activities in question.
- b. The statistical accident occurrence records of other sites where similar activities required activities are already being undertaken.
- c. Any specific differences that may be apparent in comparison with other sites, that may increase, or alter the significance of any apparent risk or hazard, i.e. is the required activity to be undertaken externally, in conditions of cold and adverse weather conditions, or in unacceptable lighting conditions

1:2:3. Where risks and hazards are fully apparent, on other employer's sites, that are not normally encountered within the working experience of the company's activities, possible guidance and assistance, with regard to assessing such foreseeable risks and hazards, must be sought at the earliest possible opportunity, by the Company Maintenance Manager, from an appropriate and authoritative professional source (The Contracted Health and Safety Consultant).

1:2:4. Where dealing with the involvement of unusual risks or hazards being apparent, i.e. water, petrol/diesel fuel, reference must be made to the client produced specific guidelines for such risks and hazards.

1:2:5. In the event of any required activity highlighting risks or hazards that are either unusual or, unpredictable in their nature, guidance and assistance must be sought at the earliest possible time during the planning stage, with regard to these required activities.

1:2:6. All of the above are controlled by the undertaking of a mandatory, fully detailed specific site risk assessment, by the Company Maintenance Manager, or the Contracted Health and Safety Consultant who has been fully trained to do so, or completed an appropriate and relevant health and safety course, in order to undertake such a responsible and essential duty.

1:3. FULLY ELIMINATING, OR CONTROLLING APPARENT RISKS AND HAZARDS:

1:3:1. Having identified all reasonably foreseeable risks, by the completion and recording of a fully detailed written site, or specific task risk assessment and report, there then exists the necessity to either, wherever it is reasonably practicable, fully eliminate the apparent risks and hazards, or bring into practice reasonably practicable control measures to partially eliminate the apparent risks and hazards.

CONCEPT METAL PRODUCTS LTD COMPANY HEALTH AND SAFETY POLICY MANUAL

1:3. FULLY ELIMINATING, OR CONTROLLING APPARENT RISKS AND HAZARDS (CONTINUED):

- 1:3:2.** The essential and paramount objective of Concept Metal Products Ltd with regard to risks and hazards identified, is to ensure that all employees who will be exposed to such risks and hazards have received the following:
- a.** Received adequate information with regard to the nature of the identified risks and hazards and their effects, and possible consequences to the employee.
 - b.** Received clear and precise instructions with regard to how the identified risks and hazards are to be approached, and how to deal with them.
 - c.** Received demonstrational instruction, through simulated training, and ensuring that the employees have fully understood what they have been informed, and that they are fully capable of undertaking the required activities safely, without risk to themselves or others.

This is a legal requirement under the Health and Safety at Work etc. Act 1974, Management of Health and Safety at Work Regulations 1999 (As Amended 2006) and also inclusive of the Construction (Design and Management) Regulations 2015.

1:3:3. METHOD STATEMENT:

In order to ensure the provision of a safe system of work, Concept Metal Products Ltd, Company Maintenance Manager, or the Contracted Health and Safety Consultant will produce, either for the client or the Principle Contractor, suitable written Method Statements, which will be inclusive of co-ordination of all activities, layout and arrangements of the way the work is to be undertaken and the methods of work that are to be adopted, especially highlighting where any high risk activities are to be undertaken. The Company Maintenance Manager, or the Contracted Health and Safety Consultant will also produce a Construction Health and Safety Plan, for each contract undertaken.

1:4. MONITORING OF RISK AND HAZARD PROCEDURES:

- 1:4:1.** Concept Metal Products Ltd is fully aware of its obligational duties and responsibilities, under the Health and Safety at Work etc. Act 1974, Management of Health and Safety at Work Regulations 1999 (As Amended 2006), Construction (Design and Management) Regulations 2015, Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) and the Provision and Use of Work Equipment Regulations 1998 (PUWER) with regard to developing the capacity to monitor and record, on a regular basis, all of its undertaken operational activities.
- 1:4:2.** The first essential requirement of the devised monitoring system must be establishing that the formulated procedures used for the identifying, eliminating as far as is reasonably practicable, or controlling apparent risks and hazards are adequate for the purpose, and that they are achieving their required objectives.
- 1:4:3.** The second requirement of the devised monitoring system must be fully confirming that the established procedures are being strictly adhered to by all employees, and are being strictly adhered to by all employees, and that no unauthorised short cuts are being incorporated by the employees
- 1:4:4.** Finally, it is essential and paramount that regular assessment of the established procedures is undertaken, with regard to verifying the extent of their relevance to the risks and hazards involved, and to revise or amend them accordingly, as and when it becomes necessary.

CONCEPT METAL PRODUCTS LTD COMPANY HEALTH AND SAFETY POLICY MANUAL

1:5. DUTIES UNDER THE CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH REGULATIONS 2002 (AS AMENDED 2004):

1:5:1. DUTIES OF THE EMPLOYER:

Concept Metal Products Ltd, as an employer, are fully aware that they have a duty and responsibility to all company employees, and a duty and responsibility to co-operate and collaborate with other employers, whose staff are present on sites owned, leased, or hired by the company. They are also fully aware that they have a duty and responsibility to all company employees, to provide such information, instruction, and training, as necessary, with regard to any hazardous substances may to be used, under the Control of Substances Hazardous to Health Regulations 2002 (As amended 2004) (Will be referred to henceforth in this policy statement as the COSHH Regulations). Also to provide Information with regard to the results of any health surveillance undertaken.

1:5:2. DUTIES OF THE EMPLOYEES:

Concept Metal Products Ltd employees have a duty and responsibility to co-operate with their employers, so far as is reasonably practicable, to enable Concept Metal Products Ltd, as an employer, to meet and comply with their obligations, under the Health and Safety at Work Act etc. 1974, and the COSHH Regulations.

1:5:3. ASSESSMENT OF SUBSTANCES:

Hazardous substances must not be used until a suitable and sufficient assessment of the risks created by that substance, to employees in their areas of work, has been evaluated and a written COSHH risk assessment has been completed.

1:5:4. Assessments must take into consideration the following:

- a. The type of substance to which employees are exposed to.
- b. Being in possession of a correctly completed, fully detailed Information COSHH information data sheet.
- c. The possible effects of those substances on the body, and state of health of the employees.
- d. Any possible control measure requirements to ensure the protection of the employees.
- e. Identify any hazards with regard to materials, machines and processes and, in conjunction with the specialist Contracted Health and Safety Consultant, recommend and implement control measures to possibly eliminate the identified hazards, or fully control them. Also ensure that all health and safety aspects are incorporated into all job instructions.

1:5:5. The amount of detailed work required, in order to undertake a satisfactory COSHH risk assessment, will vary, and will be dependant on the following:

- a. The degree and nature of the risk, and conclusions with regard to the adequacy of any required control measure implementation.
- b. Previous experience and knowledge of such hazardous substances.
- c. Any existing records and other documentation which highlights the nature of the hazardous substances involved.
- d. The suitability of the control of the hazardous substances.
- e. Any recorded and documented results of any previous monitoring of the hazardous substances.

CONTROL MEASURES:

1:5:6. Concept Metal Products Ltd, in order to ensure compliance with the COSHH Regulations, and to safeguard its employees, must achieve certain standards with regard to control, relating to inhalation, ingestion, or absorption through the skin, with regard to employees coming into contact with any substance hazardous to health.

Concept Metal Products Ltd, will ensure that staff are trained in safe working methods, and that staff have been trained to recognise hazards and are aware of the latest Global Harmonised System Safety Labels.

GHS Classifications			
New Pictogram	Number	Hazard Class (CLP)	Old 'CHIP' Symbol
	GHS-01	Explosives Self-reactive substances and mixtures, types A, B Organic Peroxides, types A,B	 Explosive Explosive
	GHS-02	Flammable gases, aerosols, liquids or solids. Self reactive substances and mixtures. Pyrophoric liquids and solids. Self heating substances and mixtures. Substances and mixtures, which in contact with water emit flammable gasses. Organic peroxides.	 Highly/Extremely Flammable
	GHS-03	Oxidising gases, liquids and solids	 Oxidising
	GHS-04 NEW	Compressed gases, liquids and solids. Liquefied gases. Refrigerated liquefied gases. Dissolved gases.	No current symbol
	GHS-05	Corrosive to metals. Skin corrosion. Severe eye damage.	 Corrosive
	GHS-06	Acute toxicity (Cat 1-3)	 Harmful  Very Toxic Harmful Toxic / Very Toxic
	GHS-07 NEW	Acute toxicity (Cat 4). Skin and eye irritation. Skin sensitisation. Specific target organ toxicity. Respiratory tract irritation. Narcotic effects.	 Harmful  Irritant Harmful / Irritant

	GHS-08	Respiratory sensitisation. Germ cell mutagenicity. Carcinogenicity. Reproductive toxicity, specific target organ toxicity. Aspiration hazard.	 <p>No current specific symbol, use either</p>
	GHS-09	Hazardous to the aquatic environment	 <p>Dangerous for the environment</p>

1:5:7. The COSHH Regulations (Regulation 8) states, that wherever possible and is reasonably practicable, control measures for hazardous substances, or substitution of a less hazardous substance should be implemented by methods other than the provision of personal protective equipment/clothing, this provision will be used as a last resort, and could possibly be inclusive of other relevant implemented control measures, other methods include the following:

- a. Substitution with a less hazardous substance.
- b. Totally enclosing the area with regard to where the hazardous substance is to be used.
- c. Providing specific and satisfactory local and general exhaust ventilation.
- d. Reducing the number of employees that will be exposed to the hazardous substance.
- e. Reducing the duration of time that the employees will be exposed to the hazardous substance.

1:5:8. Concept Metal Products Ltd, Company Maintenance Manager, must provide adequate and suitable control measures, wherever it is reasonably practicable to do so, and must ensure that the implemented control measures are efficiently, effectively and correctly used or applied. These implemented control measures will be regularly monitored by the Company Maintenance Manager, the Contracted Health and Safety Consultant and the works Supervisors. All employees have a duty and responsibility to make fully effective and correct use of any control measure implemented by their employer, and must report any discrepancies on an immediate basis, as and when they are encountered. It will be the duty and responsibility of all employees to thoroughly check any personal protective clothing or equipment issued to them, free of charge if this is a requirement, before use and any defects observed must be reported on an immediate basis, in order that a replacement may be issued. Never, under any circumstances whatsoever, must defective personal protective equipment/clothing be used, by any employee. It will be the duty and responsibility of all employees to ensure that all personal protective clothing or equipment issued to them, free of charge if this is a requirement, is correctly stored in the suitable accommodation provided for this purpose, by their employer. All issued personal protective clothing or equipment that is in use, must be removed by the employee when eating, drinking, or smoking, with regard to ensuring the prevention of contamination of their food and drink, by hazardous substances.

MONITORING WORKPLACE EXPOSURE:

1:5:9. Regular monitoring must be undertaken with regard to ensuring that all control measures implemented are adequate and suitable for the purpose, and that the correct procedures for use of the control measures are being strictly adhered to at all times. Documented records must be formulated, with regard to all monitoring of control measures undertaken, stating procedures of use, location of where the monitoring was undertaken, and the names of the employees monitored.

Any inadequacies with regard to monitoring must be reported on an immediate basis, and they must be discussed with the Company Maintenance Manager, or the Contracted Health and Safety Consultant. Any required changes that may become necessary, must be implemented on an immediate basis.

In the event of it not be possible to implement the required changes on an immediate basis, a complete prohibition on the use of the substance must be considered.

ACTION REQUIRED AT THE CONTRACT NEGOTIATION STAGE:

1:5:10. Concept Metal Products Ltd, Company Maintenance Manager, must, at the initial negotiation stage of any contract, ascertain whether their employees will have any contact with, or be required to use, any substances hazardous to health, and whether there are any, instructions, COSHH Material Safety Data Sheets (MSDS) available with regard to advice for the hazardous substance(s) advice must be sought from Concept Metal Products Ltd, Company Maintenance Manager, or the Contracted Health and Safety Consultant, where any doubt exists with regard to these matter.

BIOLOGICAL HAZARDS

1:5:11. Concept Metal Products Ltd, will ensure adequate precautions are taken to reduce risks of employees coming into contact with infectious Biological Agents. The following Biological Hazards could be encountered:

Leptospirosis (Weill's Disease)

Spread by contact with infected urine from Rats, entry into the body from cuts or hand to mouth contact. Symptoms are Flu Like, but if left untreated can lead to Jaundice and Kidney Failure. Employees who feel unwell with flu like symptoms after contact with potentially infected equipment, should report to their GP and take a copy of the HSE Leptospirosis Card with them to highlight the fact they are a higher risk worker. Risk can be significantly reduced by covering all cuts, wearing PPE and maintaining good levels of personal hygiene.

Psittacosis

This is a rare infectious disease caused by a bacterium called *Chlamydia psittaci*. It is present in Pigeon Droppings – Symptoms include Flu Like illness and pneumonia usually appearing after 5-19 days after exposure. Control measures will include the use of gloves and a FFP3 Respirator if staff are involved in installation of or removal of equipment where pigeons have been roosting.

Hepatitis

A blood borne virus present in blood and other bodily fluids – may be present in discarded needles or other contaminated dressings, disposed of incorrectly i.e. first aid dressings or needles left in the grounds. Precautions will be taken where there is a risk of needles – such as use of puncture proof gloves, steel mid-sole safety footwear. General precautions – such as use of disposable PPE and good hygiene will be suitable in most cases. Where employees are likely to come into regular contact with blood / body fluid contaminated products, it will advise employees to be vaccinated with a combined Hepatitis A / B Vaccine. The process takes 7 months in total – 3 vaccines and a blood test and possible booster. Vaccination provides 10-15 years of protection and this may last a lifetime. Any employee who has a needle-stick incident, must seek immediate emergency medical treatment.

Extrinsic allergic alveolitis (EAA)

There is also a risk of EAA from Metal Working Fluid – bacterial build up in coolant being the cause, usually the risk is minimal as staff check coolant regularly and change it before levels of bacteria get to dangerous levels. Precautions should be taken to not inhale coolant mist. Currently the amount of manual machining using coolant, doesn't warrant the retro fitting of Local Exhaust Ventilation on the manual turning lathes.

1:6. AUTHORITY AND RESPONSIBILITY:

- 1:6:1.** Within such a geographically dispersed working area as Concept Metal Products Ltd, it is not practical for any one person, or, functional group of personnel to adequately implement Concept Metal Products Ltd obligations and responsibilities. It is therefore essential and paramount to specifically specify the duties and responsibilities, and the authority of each person or group of personnel, and to fully establish precisely where each fits into the structure as a whole.
- 1:6:2.** It will be the duty and responsibility of the Company Maintenance Manager to ensure that Concept Metal Products Ltd has an adequate Health and Safety Policy Statement, written by the Contracted Health and Safety Consultant and that it is effectively and efficiently Implemented.
- 1:6:3.** The Company Maintenance Manager is responsible for the endorsing and presentation of an adequate health and safety policy, compiled and prepared by the Contracted Health and Safety Consultant. The Company Maintenance Manager will also ensure that the structure for effectively and efficiently implementing the policy is adequate, and that sufficient financial funding and qualified responsible personnel are available for the efficient and effective implementation.
- 1:6:4.** The Company Maintenance Manager, the Contracted Health and Safety Consultant and the Works Supervisors will be responsible for ensuring that the health and safety policy structure is being effectively and efficiently implemented, within their respective areas and that its efficiency and effectiveness is constantly monitored.
- 1:6:5.** The Company Maintenance Manager and the Contracted Health and Safety Consultant will be responsible for correctly advising other operational staff, with regard to all aspects of health, safety and welfare, and ensuring that all operational staff employed, receive appropriate health, safety and welfare training. The Company Maintenance Manager and the Contracted Health and Safety Consultant will also be responsible for ensuring that any further specialist health, safety and welfare training is delivered efficiently and effectively, by the Contracted Health and Safety Consultant.
- 1:6:6.** The Company Maintenance Manager will be responsible for ensuring that the health and safety policy is being efficiently and effectively implemented, within their respective areas of responsibility and they will have the authority to delegate specific duties to personnel, as and when necessity to do so arises, with particular reference to all aspects of all operations that come under their control.

CONCEPT METAL PRODUCTS LTD COMPANY HEALTH AND SAFETY POLICY MANUAL

1:6. AUTHORITY AND RESPONSIBILITY (CONTINUED):

1:6:7. It will be the duty of every company employee to:

- a. Take reasonable care for the health and safety of his/herself and of other persons who may be affected by his/her acts, or omissions at work.
- b. Undertake any duty or requirement imposed by his/her employer, or any other person, by or under any of the relevant statutory provisions, and to co-operate so far as is reasonably practicable, in order to enable the duty or imposed requirement to be fully undertaken or complied with.
- c. To wear all personal protective equipment/clothing, that has been issued, free of charge, to enable any specific duty to be undertaken safely, and without risk to him/her, or to others
- d. To report, on an immediate basis, any accident that may occur, by use of the correct accident reporting and recording procedure, forwarding precise, clear and all relevant details of the accident and recording full details of the accident in the accident recording documentation. The responsible first aid trained person attending the accident will complete the Concept Metal Products Ltd accident recording book (BI510, fully compatible to the Data Protection Act 1998) and forward the same, to the Company Maintenance Manager, without delay.
- e. In the event of any doubt occurring, with regard to any aspect of health, safety and welfare, the employee must discuss the aspect with the Company Maintenance Manager.

1:7. RESOURCES:

1:7:1. There are a number of resources available to Concept Metal Products Ltd, to assist with the efficient and effective implementation of the health and safety policy, initially with the Contracted Health and Safety Consultant, who will, should this become a requirement, obtain the relevant information from registered, recognised and qualified external Health and Safety Professional Bodies.

1:7:2. A responsible health and safety person, appointed by the Company Maintenance Manager and fully responsible to him for all aspects of health, safety and welfare, who will be responsible for the undertaking of the following duties, in conjunction with the Contracted Health and Safety Consultant:

- a. To fully interpret health and safety legislation with regard to the effect that such legislation has on the activities being undertaken by Concept Metal Products Ltd and to ensure that all procedures in operation fully comply with all of the current legislation, at all times.
- b. To obtain, as and when required and in conjunction with the contracted Health and Safety Consultant, any specialist advice with regard to any aspect of health, safety and welfare and other professional bodies, and ensure that any advice obtained is efficiently and effectively implemented. Maintaining effective liaison with the Health and Safety Executive, Factory Inspectorate, Fire Prevention and other bodies connected with the Health and Safety Executive, Factory Inspectorate and Fire Prevention.
- c. To maintain a fully up-to-date accident recording book, and for reporting all reportable accidents, under the RIDDOR 2013 Regulations, to the relevant enforcing authorities, and ensuring that Concept Metal Products Ltd Insurers receive fully detailed documentation with regard to all such reportable accidents, in the event of any potential claims arising from such accidents. To thoroughly study and evaluate all accidents reported by Concept Metal Products Ltd employees, contractors or members of the general public and all other statistical trends within Concept Metal Products Ltd, in order to enable any relevant improvements to be incorporated into any operational procedures.
- d. To maintain, inclusive of any new amendments to current legislation, a fully up-to-date and controlled, health and safety manual, and ensure that a copy of this manual is available for the use of every Concept Metal Products Ltd employee, should it be required.

CONCEPT METAL PRODUCTS LTD COMPANY HEALTH AND SAFETY POLICY MANUAL

1:7. RESOURCES (CONTINUED):

1:7:2. (Continued):

- e. Fully ensure that, due to the nature of Concept Metal Products Ltd business activities, compliance is maintained at all times, with the Lone Worker Conditions, under the Health and Safety at Work Act 1974, and the Management of Health and Safety Regulations 1999.
- f. To ensure that regular health and safety update training, and any requirement for specialist training, is thoroughly undertaken at all levels of the structure
- g. Control and monitor all nominated, trained and certificated first aid persons to ensure that all accidents that occur on Concept Metal Products Ltd premises and contracts are attended by a first aid person and that correct first aid treatment is administered. Ensure that all accidents that occur are correctly recorded into the Company Accident Book (BI510, fully compatible to the Data Protection Act 1998) and are thoroughly investigated and an accident report form and first aid person report form is completed and the Company Maintenance Manager is notified on an immediate basis. Also ensure that provision and maintenance of all medical equipment facilities are adequate at all times.
- h. To forward professional advice to all Concept Metal Products Ltd employees with regard to the purchasing of any specialist personal protective equipment/clothing requirements and other health and safety equipment.
- i. To ensure, by arrangement, delivery to employees, by a Contracted Health and Safety Consultant, any specialist and other health and safety training requirements.
- j. Ensure that any visitors, contractors or members of the general public attending the sites, for whatever reason, fully observe the Concept Metal Products Ltd safety rules and any instructions forwarded by the Company Maintenance Manager, who is responsible for the enforcement of Concept Metal Products Ltd safety rules and procedures. Also ensure that no person will work on the sites until they are covered by insurance against any risk.

1:7:3. All employees of Concept Metal Products Ltd may, at any time, call on the Company Maintenance Manager, for any advice and assistance with regard to all aspects of health, safety and welfare that are operational within Concept Metal Products Ltd.

1:7:4. The Concept Metal Products Ltd Health and Safety manual (Should this be a requirement of the company), produced and fully maintained in an up-to-date condition, by the Company Maintenance Manager, will highlight all risks and hazards of specific activities undertaken by the Concept Metal Products Ltd. This manual must be fully used by all members of Company Management and Responsible Supervisory qualified personnel involved with the initial induction of all new employees. It must also be fully used by personnel involved in continuation health and safety training.

1:7:5. Each area of the United Kingdom, with regard to health, safety and welfare, is covered by Enforcing Authorities, of which there are two. They are the Health and Safety Executive, and the Local Authorities Environmental Services Departments whose qualified staff are available to provide expert advice and assistance, which will be sought by the Company Maintenance Manager The Health and Safety Executive also publish Guidance Notes, Approved Codes of Practice and advice leaflets on a wide variety of health, safety and welfare subjects which may, from time to time, be undertaken by Concept Metal Products Ltd All required advice must be, in the first instance, sought from the Company Maintenance Manager .

1:7:7. A fully detailed extract from this company health and safety policy manual must be forwarded to each existing and new employee of the during his/her initial induction procedure. A signed receipt of having been received by existing and new employees must be retained in the employee's personnel record file.

CONCEPT METAL PRODUCTS LTD

COMPANY HEALTH AND SAFETY POLICY MANUAL

2:0. ARRANGEMENTS FOR MAINTAINING A SAFE AND HEALTHY WORKING ENVIRONMENT:

Concept Metal Products Ltd recognises that there are a number of risks and hazards throughout the business undertaken that require adequate control measures to be implemented in order to maintain the safety of all employees and all plant and machinery. These implemented control measures, in the form of safe working practices are detailed as follows:

Accident Reporting Procedures:

A complete record of all accidents that occur at the Concept Metal Products Ltd, regardless of how minor they are, must be recorded in the Concept Metal Products Ltd accident recording book (BI510, fully compatible to the Data Protection Act 1998). This accident book is available for completion to all nominated, trained and certificated first aid persons.

It is essential that all employees of Concept Metal Products Ltd, report all accidents that occur, regardless of how trivial they are thought to be, on an immediate basis as soon as they occur in order that any required remedial action can be undertaken as quickly as possible. In the event of an accident occurring, the person (s) involved must report it immediately to ensure that correct First Aid Treatment can be administered if required. The first aid person attending will be responsible, after treatment of the injured person, for correctly recording into the accident book all relevant details of the accident. Completion of an accident and first aid report form and forwarding the same to the Company Maintenance Manager. Should it be a requirement under current Regulations, a thorough investigation of the accident must be undertaken by the Company Maintenance Manager.

Reportable Accident Under RIDDOR 2013 Regulations:

Fatality – Excluding Suicide

The Maintenance Manager will call the HSE Incident Contact Centre on 0345 300 9923
Opening Hours (Mon – Fri 0830 -1700hrs)

Reporting Out of Hours - Call the HSE Incident Officer on 0151 922 9235

Major Accident:

A major accident is an accident involving an amputation, fracture, asphyxiation, blindness, dislocation of a limb, if a person is detained in hospital for more than 24 hours etc. This type of accident must be reported, by the Company Maintenance Manager to the Enforcing Authority (Health and Safety Executive), by use of an official RIDDOR Regulations 2013 reporting form (F2508), this is completed online www.hse.gov.uk/riddor, within 10 days of the accident occurring. It must also be reported, within 24 hours, by telephone, after the occurrence of the accident. On completion of the F2508 form, the Company Maintenance Manager will forward the same to the Health and Safety Executive.

Seven Day Lost Time Accident:

A Seven-Day lost time accident is an accident where an employee is off work for seven days or more (not counting the day of the accident occurring, but inclusive of non working days), as a result of the accident. This type of accident must be reported, by the Company Maintenance Manager to the Enforcing Authority (Health and Safety Executive), by use of an official RIDDOR Regulations 2013 reporting form (F2508) this is completed online www.hse.gov.uk/riddor, within 10 days of the accident occurring.

Reportable Diseases / Illnesses:

The Maintenance Manager will report online any of the following:

- **Carpal Tunnel Syndrome:** where the person's work involves regular use of percussive or vibrating tools.
- **Cramp of the hand or forearm:** where the person's work involves prolonged periods of repetitive movement of the fingers, hand or arm (Repetitive Strain Injury)
- **Occupational dermatitis:** where the person's work involves significant or regular exposure to a known skin sensitiser or irritant
- **Hand Arm Vibration Syndrome:** where the person's work involves regular use of percussive or vibrating tools, or holding materials which are subject to percussive processes, or processes causing vibration.
- **Occupational asthma:** where the person's work involves significant or regular exposure to a known respiratory sensitiser.
- **Tendonitis or tenosynovitis:** in the hand or forearm, where the person's work is physically demanding and involves frequent, repetitive movements
- **Occupational cancer:** any cancer attributed to an occupational exposure to a known human carcinogen or mutagen (including ionising radiation)
- **Exposure to a biological agent:** any disease (including any acute reaction requiring medical treatment) attributed to an occupational exposure to a biological agent

Dangerous Occurrence:

A dangerous occurrence or a near miss incident is an occurrence such as collapsing scaffolding, collapsing load-bearing walls, stairways, overturning of any load bearing part etc. This type of accident must be reported, by the Company Maintenance Manager, to the Enforcing Authority (Health and Safety Executive), by use of an official RIDDOR 2013 reporting form (F2508) this is completed online www.hse.gov.uk/riddor, within 10 days of the accident occurring. It must also be reported, within 24 hours, by telephone, after the accident occurring. A near miss is classed as an incident where no injuries are sustained by any person.

All reportable accident and dangerous occurrence documentation should be retained in a separate file due to the fact that these could become a potential claim.

CONCEPT METAL PRODUCTS LTD

COMPANY HEALTH AND SAFETY POLICY MANUAL

3:0. MANAGEMENT AND EMPLOYEE TRAINING:

All training requirements for Concept Metal Products Ltd management and employees will be identified by the Company Maintenance Manager in conjunction with the Company. Concept Metal Products Ltd actively aims to provide fully competent personnel in order to comply with any legal requirements and current legislation.

Such training provision will relate to the following:

- a. The provision of qualified and certificated first aid persons:
- b. Training in the correct use and maintenance of personal protective equipment and clothing:
- c. Concept Metal Products Ltd, for the undertaking of all required electrical duties, commission the services of a qualified electrical person, on a contractual basis. Training of fully competent personnel with regard to varying situations that could occur within any contract and training with regard to general duties that come under the Health and Safety at Work Act etc.1974:
- d. Training with regard to abrasive wheel setters and operators, delivered by the Contracted Health and Safety Consultant:
- e. Training of personnel with regard to the handling and use of chemicals and hazardous substances:
- f. Training in safe working at height, use of ladders, IPAF / PAL Training for the Use of Mobile Elevating Work Platforms (MEWPs) and PASMA 3T Training for staff involved in the assembly of Tower Scaffolds.
- g. Asbestos Awareness Training for staff who could come into contact with asbestos in the course of their normal duties, in compliance with The Control of Asbestos Regulations 2012.
- h. Health and Safety Consultants to hold appropriate levels of competency such as NEBOSH Diploma in Occupational Health and Safety.

4:0. PERSONAL PROTECTIVE EQUIPMENT AND CLOTHING:

Concept Metal Products Ltd will take all reasonably practical measures in order to remove risks and hazards from all working processes. Should this not be reasonably practicable, Concept Metal Products Ltd will provide to its employees, free of charge, the correct required personal protective equipment and clothing and the relevant training in its use and maintenance, in order to enable working processes to be conducted in a safe and effective manner. Such equipment provision will be the responsibility of the Company Maintenance Manager . The Company Maintenance Manager must ascertain the provision of the correct required equipment and clothing, prior to the commencement of each working process and ensure that the relevant employee(s) are issued with the same.

The Personal Protective Equipment and Clothing Availability is as Follows:

- a. **Eye Protection:** Eye Protection must be worn by all employees wherever there is a foreseeable likelihood of any foreign body entering the eyes. EN166: F for Impact resistance. EN169 Welding Glasses / Visors. EN279:2003 for Auto-Tinting Welding Visors
- b. **Safety Gloves/Gauntlets:** Safety Gloves/Gauntlets must be worn by all employees when undertaking any welding tasks or when handling any chemicals or hazardous substances. EN374 for Chemical / Biological Hazards (Compatibility will be checked). EN388 for Mechanical Risks (Minimum Cut Level 3)
- c. **Ear Defender Protection:** Ear Defender Protection must be worn by all employees within the workshop, Hearing Protection is Mandatory where the 2nd Action Level 85dB(A) is exceeded). Hearing protection will be selected that complies with EN352-1 Ear Muffs or EN352-2 Ear

Plugs EN352-3 Ear Muffs attached to a Safety Helmet.

- d. **Safety Shoes/Boots:** Safety Shoes or Boots must be worn by all employees, at all times whilst on the sites. Boots will be selected that meet EN345-1.
- e. **Hard Safety Hats, Hi-Vis Clothing:** Hard hats and hi-visibility clothing must be worn by all employees, at all times when undertaking any construction related working. Hard Hats will be selected that meet the Standard EN14052 and will be replaced on expiry or after impact. High Visibility Clothing will be selected that meets EN471.
- f. **Respiratory Protection:** Respiratory protection must be worn by all employees when working in areas where dust or fumes are apparent (demolition, cutting/welding/burning, using hazardous substances that are harmful by inhalation etc.) An appropriate mask will be selected to ensure protection against the hazard.
- g. **Harnesses and Lanyards:** Harnesses and lanyards must be worn, at all times when working at heights over 2 metres (or where there is another risk of falling, i.e. at ground level above an open pit etc.) Harnesses and Lanyards will be selected that meet the standard EN365.

ISSUE OF PPE

All Concept Metal Products Ltd employees will be requested, by the Company Maintenance Manager, to sign for all items of personal protective equipment or clothing issued to them. The responsibility for safe use and maintenance of such issued equipment will be that of the employee, after full training in the use and maintenance of the same. Concept Metal Products Ltd, Company Maintenance Manager, will immediately on report of any defects, renew any personal protective equipment or clothing, providing the defect is due to accident, normal wear and tear or loss, free of charge, unless negligence on behalf of the employee can be proved, then a levy may be charged for re-issue.

5:0. CONTROL OF CHEMICALS AND HAZARDOUS SUBSTANCES:

All chemicals and hazardous substances that are used in processes and stored at Concept Metal Products Ltd operational sites are potentially dangerous. Extreme care and caution must be exercised by all employees when using or handling the same. The required personal protective equipment and clothing issued, free of charge, by Concept Metal Products Ltd and signed for by the employee, must be worn at all times when using or handling all chemicals and hazardous substances. All employees must acquaint themselves with the relevant first aid precautions. All chemicals and hazardous substances must be suitably segregated, according to their compatibility, also to comply with the COSHH Regulations 2002, by making reference to the relevant, mandatory COSHH Material Safety Data Sheet (MSDS) for each chemical or hazardous substance. These COSHH Material Safety Data Sheets are held by the Company Maintenance Manager. Should employees have any doubt, advice must be sought from the Company Maintenance Manager, or the Contracted Health and Safety Consultant.

5:1. HIGHLY FLAMMABLE LIQUIDS:

The COSHH sign for identification and recognition of highly flammable liquids is a red triangular sign, showing a flame and the words "HIGHLY FLAMMABLE LIQUIDS". Smoking and use of any naked lights are strictly forbidden when using such liquids.

As there are numerous petroleum based products being supplied and used within the construction industry, certain precautions must also be strictly adhered to, they are as follows:

- a. The material must first be fully identified and the manufacturers specific instructions and recommendations for handling and use of such liquids, must be strictly adhered to, at all times:
- b. All sources of ignition being used in either storage or working areas must be totally avoided, at all times:
- c. Correct personal protective clothing must be selected and issued to all personnel involved in the use of highly flammable liquids, inclusive of respiratory equipment and personal cleaning equipment:
- d. It is essential that careful attention be paid with regard to adequate ventilation facilities, especially when working in confined spaces:
- e. The correct fire fighting equipment (Foam Extinguisher, Dry Powder Extinguisher) must be on hand, at all times whilst work is in progress and a person who is competent and trained in the correct use of fire fighting equipment:

Although gas oil, other sources of fuel and lubricating oils may not be classified as “HIGHLY FLAMMABLE”, they are classified as “FLAMMABLE” and must be handled and used in a similar manner:

All recommended procedures associated with the storage, use of and disposal of highly flammable liquids must be strictly adhered to, at all times:

CONCEPT METAL PRODUCTS LTD

COMPANY HEALTH AND SAFETY POLICY MANUAL

6:0. MACHINE GUARDING AND SAFETY DEVICES:

Under no circumstances whatsoever, must any unauthorised person either remove or tamper with any safety guarding or safety device that is in position on any machinery. No machinery whatsoever must be operated by any employee, without safety guarding and other safety devices being securely in position and no guard must be removed whilst the machinery is in motion, no matter what the circumstances are. Should any employee consider any machinery to be in a dangerous condition, consultation with the Company Maintenance Manager must be undertaken before such a machine is operated. Concept Metal Products Ltd strongly encourages its employees to undertake informal checks of their machines before beginning operations, on a daily basis, and throughout the working day.

It is extremely essential that all statutory regulations are strictly observed by all personnel when it becomes necessary to examine, lubricate or adjust machinery in motion, with any guard removed, this operation must be undertaken by a competent, fully trained and fully experienced person, at all times.

Periodic maintenance that becomes necessary to undertake, must be carried out by a competent, fully trained and fully experienced person, at all times. Should it be appropriate, all statutory notices and certificates must either be displayed, or be readily available at all times for inspection.

Plant and machinery must only be operated by employees who are fully trained, fully conversant and competent in its use.

Lock Out / Tag Out (LOTO): must be applied before working on a machine or piece of equipment which could accidentally be switched on or release energy (hydraulic / pneumatic) before an employee works on the equipment. Zero Energy should be verified before work commences as part of the LOTO process, as it is possible for electrical energy to be stored in capacitors etc.

7:0. USE AND MAINTENANCE OF LADDERS:

It is the policy of Concept Metal Products Ltd, to undertake regular checks on all ladders, before use and whilst in use at the sites to ensure that they are sound, with no splits or cracks in the stiles and rungs and that no rungs are missing. Should any defects become apparent, they must be reported to the Company Maintenance Manager, on an immediate basis, in order that the defect(s) may be rectified or the ladder in question be withdrawn from service.

Employees must not, under any circumstances whatsoever, use any defective ladders. When ladders are in use, they must be correctly placed on a firm level base, ensuring that it is equally supported on each stile and is at an angle of 4 units of length vertical to 1 unit of length horizontal and securely lashed near the top to prevent accidental movement.

Should this not be practicable, they should then be correctly secured at the bottom, either weighted or footed, however, this method is only effective for ladders up to a height of 6 metres (20 foot). It is essential that the user ensures that footwear is as clean as possible, especially the soles of the footwear, before attempting to climb the ladder.

Users must always ensure that where ladders are being used as a means of access to platforms or other items, they must extend 1.05 metres (3 foot 6 inches), or at least 5 rungs above the landing place. Never over reach when at working height, if reach cannot be safely achieved, move the ladder, not the body. A ladder should only be considered for short duration works, less than 15 minutes, and whereby 3 points of contact can be maintained at all times. If this cannot be achieved then an alternative work platform / access equipment must be used (i.e. MEWP, Tower Scaffold, Podium Steps) (**Refer to the Work at Height Regulations 2005**).

All ladders used will be Class 1 Industrial Rated Ladders. Metal Ladders will not be used in close proximity to Electrical Hazards (9 feet) if work is required closer than this, then a non-conducting fibreglass ladder will be used.

CONCEPT METAL PRODUCTS LTD

COMPANY HEALTH AND SAFETY POLICY MANUAL

8:0. FIRE PRECAUTIONS IN THE WORKPLACE (REGULATORY REFORM (FIRE SAFETY) ORDER 2005):

It is the policy of Concept Metal Products Ltd, to ensure that every effort is made to reduce both the likelihood of the outbreak of fire and control the severity of any outbreak of fire that does occur. The Responsible Person on site (Maintenance Manager) will ensure that a Fire Risk Assessment is in place for the Concept Metal Products Ltd Manufacturing site.

All employees should be extremely vigilant and report to the Company Maintenance Manager, anything that could possibly be a fire hazard. All employees must also be fully conversant with the displayed Concept Metal Products Ltd fire precautions and fire drill procedures. Employees must not, under any circumstances whatsoever, attempt to attack any outbreak of fire, unless they have received full and comprehensive training in the correct use of fire fighting equipment, then only if it is safe to do so without endangering themselves or any other persons.

On external worksites the Fire Procedures will be the responsibility of the Principal Contractors, who, under the Health and Safety at Work etc. Act 1974 (Section 3), must assume a full "Duty of Care" for all persons on their site, for whatever reason, but not employed by the Principal Contractor.

MAINTENANCE OF FIRE FIGHTING EQUIPMENT:

Concept Metal Products Ltd will ensure the following Equipment is Installed and Maintained at the Manufacturing Site:

- **Automatic Fire Detection / Fire Alarm System** – Subject to Weekly Testing of Call points / Annual Service and Detector Head Testing.
- **Emergency Lighting** – Subject to weekly visual checks, monthly physical test and annual full discharge test.
- **Fire Extinguishers / Fire Blankets** – Subject to weekly checks / annual testing (Discharge/ Recharge)

Records of the Inspections and Maintenance of Fire Safety Equipment are held in the Fire Logbook which is kept available for inspection by the Responsible Person.

FIRE DRILLS:

Fire Drills will be held twice per year:

Announced Drill – Employees will be notified of the proposed drill and then proceed to their designated assembly point on activation of fire alarm. This is to familiarise staff with the process.

Unannounced Drill – Employees will not be notified of the drill, it should take them by surprise and measure the effectiveness of previous training.

Records of Drills will be held by the Responsible Person in the Fire Logbook.

9:0. GENERAL HOUSEKEEPING:

One of the major contributors towards any employer operating very poor fire standards stems from operating very poor housekeeping standards. It is also very apparent that operating very poor fire and housekeeping standards also enhances the cause of injury to employees from slipping, tripping and falling, contact with discarded materials etc. All Concept Metal Products Ltd employees have a responsibility for ensuring that general housekeeping standards on sites are maintained at a high standard within their working and leisure areas. This high standard must be maintained at all times in order that easy access to and egress from the sites becomes paramount. All waste, grease, oils, wood, scraps of metal etc. are immediately disposed of in the correct manner. Materials must be stored and stacked in a tidy and safe manner and not too high and not stored or stacked in the

working area where they could impede safe access or egress, or impede the safe working of other employees. Tools and other equipment must not be left in any area where they could possibly become a hazard. Accumulated debris is a severe fire risk and could possibly become a traffic movement hazard.

10:0. CONTROL OF CONTRACTORS ATTENDING THE SITES:

Concept Metal Products Ltd will fully endeavour to and have a legal and moral duty to completely control all work at the sites that is undertaken by outside contract companies undertaking sub-contracted work, to ensure that the work being undertaken does not adversely affect the health, safety and welfare of its employees.

All contractors used must provide to the Concept Metal Products Ltd, Company Maintenance Manager, their written health and safety policy statement (if employing 5 or more persons), working method statements, safe systems of work and completed site/job based risk assessments.

The Concept Metal Products Ltd, Company Maintenance Manager, will issue to all contractors, signed and dated permits to work, should this be a requirement. Concept Metal Products Ltd employees must report, on an immediate basis, any working practices that could be considered to be unsafe practices being operated by any contractor undertaking designated work at the sites. These practices must be reported to the Concept Metal Products Ltd, Company Maintenance Manager. Under no circumstances whatsoever, must designated contractors be allowed to use any Concept Metal Products Ltd machinery or any other equipment, without the correct authorisation from the Company Maintenance Manager.

All contractors undertaking designated work at the sites must be informed that the site roof area, should it be the case, is of an asbestos or other fragile material sheeting construction and crawling boards must be used at all times in the event of any work being undertaken on this roof area. Should there be any doubt, with regard to this instruction; the contractor must then consult with the, Company Maintenance Manager, for advice and direction.

Any sub-contractor that employs a total of more than 20 employees, must be able to demonstrate that they can call on competent health and safety advisors, either initially, or on a consultative basis. Sub-contractors must also be able to demonstrate that they are prepared and able to allocate sufficient resources, with regard to safety supervision, safety equipment, safety training, etc. in relation to their size and nature of work.

The Company Maintenance Manager, or a Contracted Health and Safety Consultant, undertakes very careful assessment of all processes that involve the use of potentially harmful or dangerous substances, to ensure that current required hygiene standards are fully complied with at all times. Also, after consultation with its employees concerned with these processes, the required and necessary precautions are fully instituted.

In the event of any injury being sustained by any employee, regardless of how trivial it is thought to be, contact with a nominated, trained and certificated first aid person must be made, in order that correct first aid treatment may be administered and the accident be recorded into the Concept Metal Products Ltd accident book (BI510, fully compatible to the Data Protection Act 1998).

CONCEPT METAL PRODUCTS LTD COMPANY HEALTH AND SAFETY POLICY MANUAL

11:0 HIGH HAZARD OPERATIONS:

In the event of any work being undertaken working from heights, working in confined spaces and on certain electrical equipment, that could possibly require a permit to work being issued before any work is undertaken, persons undertaking such work must consult with either the Concept Metal Products Ltd, Company Maintenance Manager, or the Contracted Health and Safety Consultant in order that the required permit to work can be signed, dated and issued in order that the required work may be undertaken efficiently, effectively and safely.

12:0 GENERAL COMPANY RULES:

In the event of employees being in any doubt, or have any concerns with regard to the implementation of Concept Metal Products Ltd safe working procedures, or have any concerns with regard to the implementation being unsafe, they should consult, for advice in the first instance, the Company Maintenance Manager. Concept Metal Products Ltd employees must strictly adhere to all implemented rules and regulations, for the maintenance of a healthy and safe working environment, at all times.

13:0 COMPANY DISCIPLINE:

Concept Metal Products Ltd will ensure that all of its employees are fully aware of all rules and regulations, with regard to all safe systems of work that may be implemented by means of this health and safety policy. All Concept Metal Products Ltd employees must strictly adhere to all implemented rules, regulations, safe systems of work and the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999 (As Amended 2006), in order to fully ensure the maintenance of a healthy and safe working environment, at all times.

All Concept Metal Products Ltd employees are fully subject to all of the implemented employer's standard disciplinary procedures, at all times whilst employed by Concept Metal Products Ltd.

Concept Metal Products Ltd employees shall be fully subject to a verbal warning, followed by a written warning with regard to them being guilty of any breaches of implemented safety rules and regulations. This will be followed by a second and then final written warnings before dismissal for persistent breaches of safety rules and regulations.

It is an immediate dismissible offence for any employee showing a flagrant disregard of any implemented safety rule or regulation.

It is the right of every Concept Metal Products Ltd employee to lodge a fully valid complaint of what they may consider to be unfair treatment, to the Company Maintenance Manager.

14:0 SITE EMERGENCY EVACUATION PROCEDURES (REGULATORY REFORM (FIRE SAFETY) ORDER 2005)

14:1 FIRE PROCEDURES, EVACUATION OF PERSONNEL:

14:1:1 Objectives:

The paramount objective of Concept Metal Products Ltd, with regard to evacuation of personnel from the sites is the preservation of life of all of its employees. It will become a necessity for all personnel to be evacuated from the sites in the event of the outbreak of a fire, possible risk of the occurrence of an explosion, or any other unforeseen emergency occurring, which could possibly put the life of employees at risk. These procedures will be the Principal Contractors, who, under the Health and Safety at Work etc. Act 1974 (Section 3), must assume a full "Duty of Care" for all persons on their site, for whatever reason, but not employed by the Principal Contractor.

CONCEPT METAL PRODUCTS LTD

COMPANY HEALTH AND SAFETY POLICY MANUAL

14:0 SITE EMERGENCY EVACUATION PROCEDURES (REGULATORY REFORM (FIRE SAFETY) ORDER 2005) (CONTINUED):

14:1:2 Indication Evacuation Signal:

In the event of a requirement occurring for the evacuation from the site of all Concept Metal Products Ltd employees, visitor and contractors, the Indication Evacuation Signal will be a person shouting "FIRE" (or whatever procedures that the Principal Contractor has implemented at the time.)

On hearing the shout of "FIRE", all employees, visitors and contractors must adopt the following procedure: -

- a. Switch off and isolate any machinery that you have been operating:
- b. Evacuate the site by use of the nearest designated fire exit (if working inside and provided that this exit is not obstructed by either fire or smoke), if working outside, proceed immediately by the safest and quickest route, to the designated fire assembly muster point:
- c. Report immediately to the designated Responsible Person at the designated fire assembly muster point in order that you may be accounted for:
- d. ALL PERSONNEL, VISITORS AND CONTRACTORS MUST REMAIN AT THE FIRE ASSEMBLY MUSTER POINT, AT ALL TIMES THROUGHOUT THE INCIDENT UNTIL THE COMPANY MAINTENANCE MANAGER OR HIS NOMINATED DEPUTY IS INFORMED BY THE SENIOR FIRE OFFICER ATTENDING THE INCIDENT IS INFORMED THAT IT IS SAFE TO RE-OCCUPY THE SITE.

These procedures will be the Principal Contractors, who, under the Health and Safety at Work etc. Act 1974 (Section 3), must assume a full "Duty of Care" for all persons on their site, for whatever reason, but not employed by the Principal Contractor.

14:1:3 Designated Fire Assembly Muster Point:

The designated Concept Metal Products Ltd fire assembly muster point will be as determined either by the person in charge of the Concept Metal Products Ltd contract when the contract is accepted or by the Principal Contractor if Concept Metal Products Ltd is engaged as a sub-contractor.

The designated fire assembly muster point at Concept Metal Products Ltd is The Car Park Gate by Mills Hill Road, ensuring that clear and unobstructed access is given to the Emergency Fire Service on their arrival, at the premises.

14:1:4 Company Roll Calls at the Designated Fire Assembly Muster Points:

The designated Concept Metal Products Ltd Responsible Person (Company Maintenance Manager or Nominated Deputy) must be present at the designated Concept Metal Products Ltd premises fire assembly muster points and will be fully responsible for the undertaking of a roll call check of personnel, visitors and contractors, to ensure that all persons can be fully accounted for.

This roll call check must be undertaken as soon as possible. Full supervision of all personnel, visitors and contractors must be maintained at the fire assembly muster point to ensure that the roll call check is successfully completed and to ensure that no person attempts to return to the site and the designated Responsible Person will remain at the fire assembly muster point in order that discipline may be maintained. The results of the roll call check must be forwarded, on an immediate basis, to the Principle Contractors Responsible Person if Concept Metal Products Ltd is engaged as a sub-contractor at the fire assembly muster point.

All visitors to the site and working contractors should be escorted to the fire assembly muster point by the person that they are visiting or working for and their names and names of their relevant companies attached to the roll call check lists.

CONCEPT METAL PRODUCTS LTD

COMPANY HEALTH AND SAFETY POLICY MANUAL

14:0 EMERGENCY PROCEDURES (CONTINUED):

14:1:6 Emergency Evacuation Routes:

It is highly probable that there will be no specific emergency evacuation routes designated at sites where Concept Metal Products Ltd is undertaking work. Emergency evacuation of all sites will be dependant on the situation and circumstances existing at the time of the requirement for and emergency evacuation of the sites to be undertaken.

All personnel, visitors and contractors must remain clear of buildings, at all times, especially of the glass window areas etc., do not walk between any parked vehicles or in areas where any spillages are apparent, unless it is unavoidable to do so.

At the Hyde Manufacturing sites, designated evacuation routes are provided, and inspections are regularly undertaken to ensure that these remain unobstructed and are available for use in the event of an emergency.

15:0 FIRST AID FACILITIES (HEALTH AND SAFETY (FIRST AID) REGULATIONS 1981 (AS AMENDED):

15:1 Concept Metal Products Ltd first aid facilities are located within the Middleton Manufacturing Sites and in all company vehicles. They are inclusive of a fully stocked and adequate for the number of personnel employed, first aid box, eye wash stations current accident book and other accident reporting and recording documentation, for the use of designated, trained and certificated first aid persons (Lists of first aid persons are displayed throughout the sites). First aid treatment must only be administered by a designated, trained and certificated first aid person.

15:2 In the event of it not being possible to administer the correct required first aid treatment on the site, the injured person must be transported to a Hospital Accident and Emergency Unit, on an immediate basis, either by ambulance, or by a member of Concept Metal Products Ltd staff, or Principal Contractor personnel.

15:3 In the event of the occurrence of a major injury, the designated first aid person attending the incident must take the appropriate, required action, i.e. summon an Ambulance and administer the required first aid treatment until the arrival of the ambulance.

15:4 Should Concept Metal Products Ltd be sub-contracted to undertake work by a Principle Contractor, all employees will come under the first aid procedures adopted either the Principle Contractor, at all times.

16:0 LIFTING OPERATIONS LIFTING EQUIPMENT REGULATIONS 1998 (LOLER):

16:1 These Regulations require that lifting equipment provided for use at work is:

- Strong and stable enough for the particular use and marked to indicate safe working load:
- Positioned and installed to minimise any risk of injury:
- Used safely, i.e. the work is planned, organised and performed by competent persons:
- Subject to ongoing, thorough examination and, where appropriate, inspected by competent persons:

Lifting equipment includes any equipment used at work for lifting or lowering loads, including attachments used for anchoring, fixing or supporting it. The Regulations cover a wide range of equipment including, cranes, forklift trucks, lifts, hoists, mobile elevated work platforms and vehicle inspection platform hoists.

The definition also includes lifting accessories such as chains, slings, eyebolts etc. Whilst employees DO NOT have duties under the (LOLER) Regulations, they DO have general duties under the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999 (As Amended 2006).

CONCEPT METAL PRODUCTS LTD HEALTH AND SAFETY POLICY STATEMENT

LIFTING OPERATIONS LIFTING EQUIPMENT REGULATIONS 1998 (LOLER) (CONTINUED):

All Concept Metal Products Ltd Responsible Persons are fully aware of this regulation and endeavour to strictly adhere to the same by enhancement to all personnel, at all times.

Concept Metal Products Ltd provide training in correct methods for lifting and slinging for all personnel who attach loads to cranes or hoists, so as to minimise the risks of equipment failure or dropped loads due to poor techniques ben employed.

17:0 PROVISION AND USE OF WORK EQUIPMENT REGULATIONS 1998 (PUWER):

17:1 These Regulations require that equipment provided for use at work is:

- Suitable for use, and for the purpose and conditions in which it is used:
- Maintained in a safe condition for use so that person's health and safety is not at risk:
- Inspected in certain circumstances to ensure that it is, and continues to be, safe for use. Any inspection should be carried out by a competent person (this could be an employee, if they have the necessary competence to perform the task) and a record kept until the next inspection:

These Regulations cover any equipment which is used by any employee at work, for example, hammers, knives, ladders, drilling machines, power presses, circular saws, photocopiers, lifting equipment (including lifts), dumper trucks and motor vehicles.

Concept Metal Products Ltd allow employees to provide their own equipment, and acknowledge it too will be covered by (PUWER), the business conduct regular inspections of tools and equipment to ensure that it complies. Non-compliant personal tools and equipment will be removed from service, and replace with company bought tools that do comply with PUWER.

Examples of uses of equipment which are covered by the Regulations include starting or stopping the equipment, repairing, modifying, maintaining, servicing, cleaning and transporting.

These Regulations DO NOT apply to equipment used by the general public, for example, compressed air equipment used in a garage forecourt. However, such circumstances are covered by the Health and Safety at Work etc. Act 1974.

Whilst employees DO NOT have duties under the (PUWER) Regulations, they DO have general duties under the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999 (As Amended 2006).

Concept Metal Products Ltd ensure that risks, created by the use of the equipment, are eliminated where possible, or controlled by:-

- Taking appropriate 'hardware' measures, e.g. providing suitable guards, protection devices, markings and warning devices, system control devices (such as emergency stop buttons) and personal protective equipment/clothing:
- Taking appropriate 'software' measures such as following safe systems of work (e.g. ensuring maintenance is only performed when equipment is shut down etc.) and providing adequate information, instruction and training.

All Concept Metal Products Ltd Responsible Persons are fully aware of this regulation and endeavour to strictly adhere to the same by enhancement to all personnel, at all times:

CONCEPT METAL PRODUCTS LTD COMPANY HEALTH AND SAFETY POLICY MANUAL

18:0. HEALTH AND SAFETY (DISPLAY SCREEN EQUIPMENT) REGULATIONS 1992 (AMENDED 2002):

Concept Metal Products Ltd, being a company operating computer equipment, within their work related duties, must full adhere to the Health and Safety (Display Screen Equipment) Regulations 1992, at all times.

Compliance is achieved by completion of "Workstation Check Lists" with, and in the presents of, all user/operators, taking into consideration all aspects of ergonomics of the workstation.

"Display Screen Equipment" means any alphanumeric or graphic display screen, regardless of the display process involved.

"Operator" means a person who habitually uses display screen equipment, as a significant part of his/her normal work.

"Use" means use for, or in connection with work.

"User" means an employed person who habitually uses display screen equipment as a significant part of his/her normal work.

"Workstation" means an assembly comprising of, display screen equipment (whether provided with software determining the interface between the equipment and its operator or user, a keyboard or any other input device).

Any optional accessories to the display screen equipment. Any disk drive, telephone, modem, printer, document holder, work chair, work desk, work surface or other item peripheral to the display screen equipment, and the immediate work environment around the display screen equipment.

Concept Metal Products Ltd will provide free eye test facilities to all constant users, on request on a 12 monthly basis.

19:0. HEALTH AND SAFETY OF LEARNER/YOUNG PERSONS (MANAGEMENT OF HEALTH AND SAFETY AT WORK REGULATIONS 1999 (AS AMENDED 2006) (SECTION 19):

HEALTH AND SAFETY (YOUNG PERSONS) REGULATIONS 1997:

- 19:1.** The Health and Safety (Young Persons) Regulations 1997 came into force on the 3rd March 1997 and was brought out under the Health and Safety at Work etc. Act 1974. These Regulations built on the risk assessment and information requirements of the Management of Health and Safety at Work Regulations 1999 (As Amended 2006).

Within the Young Persons Regulations, the following definitions apply:

A "Child" means a person who is not over the compulsory school age (Education Act 1996):

A "Young Person" means any person who has not attained the age of eighteen:

Under these Regulations, Concept Metal Products Ltd will take particular account of the following when they assess the risks to the young persons:

- Young persons lack of experience:
- Young persons lack of awareness of existing, or potential risks:
- Young person's immaturity:

Young persons risk assessment must be undertaken, before the young person starts work:

This risk assessment must determine whether the young person is prohibited from undertaking certain tasks of work. This does not apply to young persons over school leaving age who are undergoing work tasks necessary for their training and who are correctly supervised by a competent person and where the risks have been controlled and reduced to the lowest level practicable.

Concept Metal Products Ltd will inform young persons' parents, or those with parental responsibilities, of school age children, of the outcomes of the undertaken risk assessment and the control measures introduced. This information must be inclusive of:

- The risks to health and safety identified by the risk assessment:
- The protective and preventative measures:
- The risks notified to him in accordance with Regulation 11(1)(c), of the Management of Health and Safety at Work Regulations 1999 (As Amended 2006):

When undertaking or reviewing the risk assessment, Concept Metal Products Ltd will take account of the following:-

- The inexperience and lack of awareness of risks and immaturity of young persons:
- The fitting out of and layout of the workplace and work station:
- The nature, degree and duration of exposure to physical, biological and chemical agents:
- The form, range and use of work equipment and the way in which it is handled:
- The organisation of processes and activities:
- The extent of the health and safety training provided, or to be provided, to young persons:
- Risks from agents, processes and work listed in Table 1, of the Health and Safety (Young Persons) Regulations 1997:

Concept Metal Products Ltd will ensure that young persons employed by the company, are protected at work from any risks to their health and safety, which are a consequence of their lack of experience, of absence of awareness of existing, or potential risks, or the fact that the young persons have not yet fully matured:

Concept Metal Products Ltd will not employ a young person for work if the following are apparent:

- Which is beyond the young person's physical or psychological capacity:
- Involving harmful exposure to agents which are toxic or carcinogenic, cause heritable genetic damage or harm to the unborn child, or which in any other way, chronically affect human health:
Involve harmful exposure to radiation:
- Involve the risk of accidents which it may reasonably be assured cannot be recognised, or avoided by the young persons, owing to their insufficient attention to safety, or lack of experience:
- In which there are risk to health from:
 - Extreme cold or heat
 - Noise
 - Vibration

Determining whether work will involve harm or risk for the purpose of this paragraph, regard shall be made to the results of the risk assessment:

All Concept Metal Products Ltd Responsible Persons are fully aware of this regulation and endeavour to strictly adhere to the same by enhancement to all personnel, at all times:

CONCEPT METAL PRODUCTS LTD COMPANY HEALTH AND SAFETY POLICY MANUAL

20:0. CONSULTING WITH EMPLOYEES ON HEALTH AND SAFETY:

20:1. REPRESENTATION AND CONSULTATION:

Concept Metal Products Ltd is a non-unionised workplace therefore comply with the requirements to consult with employees by following *The Health and Safety (Consultation with Employees) Regulations 1996* (covers all employers whose workforce is none Trade Union indoctrinated):

Concept Metal Products Ltd consult with employees directly, the Maintenance Manager operates an open door policy and employees are free to discuss Health and Safety issues with the management at any time.

The contracted Health and Safety Advisor provides a monthly Toolbox Talk on a Health and Safety Topic, and uses this a method to disseminate safety information, but also to elicit feedback from the employees which is then fed back to the site management. Employees sign to show their presence at these Toolbox talks as a way of demonstrating the process of consultation.

Health and Safety information is also displayed on the site Health and Safety notice boards.

All Concept Metal Products Ltd Responsible Persons are fully aware of this regulation and endeavour to strictly adhere to the same by enhancement to all personnel, at all times:

21:0 WORK AT HEIGHT:

THE WORK AT HEIGHT REGULATIONS 2005 (AS AMENDED 2007):

21:1 What Is “Work At Height” (Regulation 2)?

Any place is classified as “At Height”, if any person could be injured by falling from it, even if it is at, or below ground level.

“Work” is inclusive of moving around at a place of work (with the exception of by a staircase in a permanent workplace), but not travelling to or from a place of work.

21:2 The Work at Height Regulations 2005 (As Amended 2007) apply to **ALL** work at height where there is a risk of a fall, liable to cause personal injury. They place duties onto employers, the self-employed, and any person who controls the work of other persons (e.g. Facilities Managers, or building owners who may contract other persons to work at height), to the extent that they control the work.

Employees or persons working under someone else’s control, Regulation 14 states that you must:

- Report any safety hazards your employer or the person controlling:
- Correctly use all equipment provided (inclusive of safety devices), strictly adhere to any training and instructions (unless you estimate that it would be unsafe to do so, in which case, seek further instructions before continuing):

21:3 The Work at Height Regulations 2005, cover the following requirements:

- Schedule 1: Existing places of work and means of access for work at height:
- Schedule 2: Collective fall prevention (e.g. guard rails and toe boards):
- Schedule 3: Working platforms:
- Schedule 4: Collective fall arrest (e.g. nets, airbags etc.):
- Schedule 5: Personal fall protection (e.g. work restraints, work positioning, fall arrest and rope access):
- Schedule 6: Ladders and step ladders:
- Schedule 7: Inspection reports (for working platforms in construction only):
- Schedule 8: Revocations:

CONCEPT METAL PRODUCTS LTD

COMPANY HEALTH AND SAFETY POLICY MANUAL

21:0 WORK AT HEIGHT (CONTINUED): THE WORK AT HEIGHT REGULATIONS 2005 (AS AMENDED 2007):

21:4 Duties of Employers (“Duty Holder”):

Concept Metal Products Ltd will do all that is reasonably practical, in order to prevent any person falling from height.

The Regulations set out a simple hierarchy for managing and selecting equipment for work at height, these are as follows:

- Avoid having to undertake any work at height, wherever it is reasonably practicable:
- Use work equipment, or other measures to prevent falls, wherever they cannot avoid undertaking work at height:
- Wherever the risk of falls cannot be eliminated, use work equipment or other measures, in order to minimise the distance and consequences of a fall, should on occur:
- Ensure that all work at height is correctly planned and organised:
- Ensure that all work at height takes into account the weather conditions, that could endanger person’s health and safety:
- Ensure that all persons involved within work at height, are trained and are fully competent:
- Ensure that the location where work at height is to be undertaken, is fully safe:
- Ensure that all equipment to be used for work at height is correctly and appropriately inspected:
- Ensure that the risks from working on fragile surfaces, are correctly controlled:
- Ensure that the risks from falling objects are correctly controlled:

21:5 Use of Ladders in Construction:

UNDER THE REGULATIONS, LADDERS CAN BE USED FOR ACCESS AND EGRESS AND LADDERS CAN BE USED TO WORK FROM. USE OF LADDERS IS LEGAL:

The use of portable ladders in industry in the UK, is currently controlled under a number of legal items, including:

- a. The Health and Safety at Work etc. Act 1974:
- b. Management of Health and Safety at Work Regulations 1999 (As Amended 2006):
- c. Manual Handling Operations Regulations 1992 (Amended 2002):
- d. Personal Protective Equipment Regulations 1992 (Amended 2002):
- e. Provision and Use of Work Equipment Regulations 1998 (PUWER):
- f. Workplace (Health, Safety and Welfare) Regulations 1992 (Amended 1998):

The primary objective of the new legislation is, “To eliminate work at height wherever possible, and where it is not possible, to ensure that ALL work at height is undertaken safely and that equipment used has been appropriately selected and inspected, whether it is from a Mobile Elevating Work Platform (MEWP), Scaffolding or a Ladder:

Where work at height cannot be eliminated/avoided, safe means of access working should be considered. As far as ladders in particular are concerned, the following should be considered:

- a. What is it to be used for?
- b. Type of Ladder?
- c. Loads to be carried?
- d. Short duration of the work?
- e. Prevention of and consequences of falls?
- f. Wear and tear of the equipment?
- g. Other suitable access equipment?
- h. Frequency of access?
- i. Training and abilities of users?

- j. Workplace, ground and site conditions inclusive of, access and egress and external factors e.g. weather and vandalism, as well as safety from electrical shocks?

Ladders are Work Equipment, as defined by PUWER 1998 and must be suitable for the task to be undertaken:

Ladders can be used as workplaces, when it is not reasonably practical to use other potentially safer means and the Risk Assessment highlights that the risks are LOW:

21:6 Use of Mobile Tower Scaffold Units:

Mobile Tower Scaffold Units are widely used in industry and are involved in numerous accidents each year. These accidents usually occur because the Mobile tower scaffold Unit has not been correctly erected, or not being correctly used. Aluminium towers are light and can easily overturn. Towers rely on all of the required parts being correctly in position, in order to ensure adequate strength. They can easily collapse when required parts have been left out of the erection procedure:

Erection of Mobile Tower Scaffold Units:

A wide range of prefabricated towers are available. The manufacturer or the supplier **MUST** provide an adequate instruction manual, which **MUST** give correct advice on the erection sequence and bracing requirements.

Should the mobile tower scaffold units have been hired, the hirer **MUST** provide this information. This provided information **MUST** be forwarded to the competent person undertaking the erection procedure:

All Concept Metal Products Ltd staff that erect Mobile Tower Scaffolding will be required to hold a valid PASMA 3T Certificate.

Non-certified members of staff, are not permitted to erect or make alterations to Mobile Tower Scaffolds.

Mobile Tower Scaffold Unit Stability Requirements:

Ensure that the tower is resting on firm, level ground, with the wheels or feet correctly supported. **DO NOT** use bricks or building blocks to take the weight of any part of the mobile tower scaffold unit. The taller the erected tower, the more likely it is to become unstable. Always check the safe height to base ratio in the provided instruction manual.

Remember, the stability of any tower will be affected by the following:

- Should the tower be sheeted and/or likely to be exposed to strong winds:
- Should the tower be loaded with heavy equipment or materials:
- Should the tower be used to hoist heavy materials, or support rubbish chutes:
- Should the tower be used for operations involving heavy or awkward equipment e.g. grit blasting, water-jetting etc.

Before use of the tower scaffold, check the following:

- Check that the erected tower is vertical:
- Check that the erected tower wheel brakes are "Locked On" (All Four Wheels):
- Check for presence of Overhead Services / Power lines / Busbars etc.

Inspection of Mobile Tower Scaffold Units:

All erected mobile tower scaffold units **MUST** be inspected, by a "competent Person", as follows: -

- Before the first use of the tower:
- After any substantial alteration has been made to the tower:
- After any event likely to have affected the tower stability:

Should the tower remain erected in the same location, for more than seven days, it **MUST** also be inspected at regular intervals (not exceeding seven days) and a thorough written report be formulated. Any faults observed **MUST** be rectified, on an immediate basis:

All Concept Metal Products Ltd Responsible Persons are fully aware of this regulation and endeavour to strictly adhere to the same by enhancement to all personnel, at all times:

21.7 Use of Mobile Elevating Work Platforms (MEWP)

All Concept Metal Products Ltd Staff that are required to operate a MEWP will hold a valid IPAF – Powered Access Licence.

Licence categories required will be:

3a – For Scissor Lifts

3b – For Boom Lifts



MEWPs will only be used in accordance with the training given by IPAF Instructors.

Prior to use Concept Metal Products Ltd Staff will check the following:

- **Ground Conditions** / presence of weak structures drains, manholes, kerbs etc.
- **Wind Speed** - MEWP will not be used if wind speeds are gusting above 28mph (checks will be conducted using an anemometer)
- **Anchor Points** – All Harness Anchor Points will be checked prior to use, only designated anchor points will be used.
- **Emergency Lowering Mechanism** is working.
- **Means of Communication** – Staff working in the platform will have a means of communication (radio/ mobile phone) to summon assistance if they encounter a problem whilst elevated.
- **Harness and Work Restraint** (1.1m fixed lanyard) will be used at all times when operating a Boom Lift. The clients safety rules will be obeyed when working in a scissor lift.

MEWPs are subject to a 6 Monthly LOLER inspection. If Hired equipment is used, a copy of the LOLER certificate will be obtained from the hire company prior to use.

MEWPs will only be used for lifting personnel, they will not be used to lift equipment at height.

CONCEPT METAL PRODUCTS LTD

COMPANY HEALTH AND SAFETY POLICY MANUAL

22:0 Hand-Arm Vibration: Control of Vibration at Work Regulations 2005:

The Health Effects of Hand-Arm Vibration:

What is Hand-Arm Vibration:

Hand-Arm vibration is vibration transmitted from work processes, into workers hands and arms. It can be caused by operating hand-held power tools, such as road breakers and hand-guided equipment such as powered lawnmowers, or by holding materials being processed by machines, such as angle grinders and drills.

When is This Hazardous?

Regular and frequent exposure to Hand-Arm vibration can lead to permanent health effects. This is most likely when contact with a vibrating tool or work process is a regular part of a person's job.

Occasional exposure is unlikely to cause ill health:

What Health Effects can Hand-Arm Vibration Cause?

Hand-Arm vibration can cause a range of conditions, collectively known as Hand-Arm Vibration Syndrome (HAVS), as well as specific diseases such as Carpal Tunnel Syndrome:

What are the Early Symptoms?

Identifying signs and symptoms at an early stage is extremely important. It will allow the employer to take action, in order to prevent the health effects from becoming serious for employees. The symptoms are inclusive of any combination of the following: -

- Tingling and numbness in the fingers:
- Not being able to feel things properly:
- Loss of strength in the hands:
- The fingers going **WHITE** (blanched) and becoming **RED** and painful recovery (particularly in cold and wet weather conditions, and probably only in the tips of the fingers initially):

For some persons, symptoms may appear after only a few months of exposure, but for other persons, they may take a few years. They are likely to get worse with continued exposure to vibration and may become permanent:

What Effects do These Symptoms Have?

The effects on persons are inclusive of the following:

- Pain, distress and sleep disturbance:
- Inability to undertake fine work (e.g. assembling small components), or everyday tasks (e.g. fastening buttons):
- Reduce the ability to undertake work in cold or damp weather conditions (i.e. most outdoor work), which would trigger finger balance attacks:
- Reduce grip strength which may affect the ability to undertake work safely:

These effects can severely limit jobs that an affected person may be able to undertake, as well as many family and social activities:

What Jobs and Industries are Most Likely to Involve Hand-Arm Vibration?

Jobs requiring regular and frequent use of vibrating tools and equipment and handling of vibrating materials, are found in a wide range of industries, such as building and maintenance of roads and railways, construction etc.:

What Kind of Tools and Equipment can Cause Ill Health from Vibration?

There are hundreds of different types of hand-held power tools and equipment which can cause ill health from vibration. Some of the more common ones are as follows: -

Chainsaws, concrete breakers/road breakers, cut-off saws (for metal, stone etc.), hammer drills, hand-held angle grinders etc., impact wrenches, jigsaws, pedestal grinders, polishers, power hammers and chisels, powered lawn mowers, powered sanders, trimmers/brush cutters etc.:

Exposure Action Value (EAV) and Exposure Limit Value (ELV):

What is Exposure Action Value?

The Exposure Action Value (EVA), is a daily amount of vibration exposure above which employers are required to take action, in order to control exposure. The greater the exposure level, the greater the risk and the more action employers will need to take, in order to reduce the risk. For hand-arm vibration, the EAV is a daily exposure of 2.5 m/s² A (8):

What is Exposure Limit Value?

The Exposure Limit Value (ELV), is the maximum amount of vibration any employee may be exposed to, on any single day. For hand-arm vibration the ELV is a daily exposure of 5 m/s² A(8). It represents a high risk above which employees **MUST NOT** be exposed.

The Exposure Limit Value may be exceeded during the transitional period, as long as you have complied with all of the other requirements of the Regulations and taken all reasonably practicable actions to reduce exposure, as much as can be achieved.

Employers Legal Requirement Duties:

Concept Metal Products Ltd will:

- Assess the vibration risk to all employees, using manufacturers vibration data / on-tool measurements or a combination of both.
- Decide if employees are likely to be exposed above the daily Exposure Action Value (EAV) and if they are; introduce a programme of controls to eliminate risk, or reduce exposure to as low a level as is reasonably practicable.
- Provide health surveillance (regular health checks), for those employees who continue to be regularly exposed above the daily Exposure Action Value, or otherwise continue to be at risk.
- Decide if employees are likely to be exposed above the daily Exposure Limit Action (ELA) and if they are, take immediate action to reduce their exposure below the Limit Value.
- Provide information and training for all employees on health risks and the actions that are being taken to control those risks – this has been undertaken by a series of Toolbox Talks.
- Consult with employees, with regard to proposals to control risks and to provide health surveillance:
- Maintain a complete record of completed Risk Assessments and control actions.
- Maintain health records for employees under health surveillance.
- Review and update completed Risk Assessments, on a regular basis, or when new tools or processes are introduced.

Provision of Information and Training:

What Information and Training does an Employer have to Provide to Employees?

Concept Metal Products Ltd have provided their employees with information and training on the following:

- The health effects related to hand-arm vibration:
- Sources with regard to hand-arm vibration:
- Whether employees are at risk and if so, whether the risk is high (above the ELV), medium (above the EAV), or low:
- The risk factors (e.g. the levels of vibration, daily exposure duration, regularity of exposure over weeks, months and years):
- How to recognise and report symptoms:
- The requirement for health surveillance, how it can help employees to remain fit for work, how you, as an employer plan to provide health surveillance, how you plan to use the results and the confidentiality of the results:

Ways to minimise the risks are inclusive of the following:

- Changes to working practices in order to reduce vibration exposure:
- Correct selection, use of and maintenance of equipment:
- Correct techniques for equipment use, how to reduce grip force etc.:

- Maintenance of good blood circulation at work, by keeping warm and massaging fingers and, if possible, cutting down on smoking:

All Concept Metal Products Ltd Responsible Persons are fully aware of this regulation and endeavour to strictly adhere to the same by enhancement to all personnel, at all times:

23:0 Stress at Work:

23:1 Definition of Stress:

The Health and Safety Executive (HSE) defines stress as the following: -

“The adverse reaction people have to excessive pressure or other type of demand placed upon them. This makes an important distinction between the beneficial effects of reasonable pressure and challenging (which can be stimulating, motivating and can give a “Buzz”) and work-related stress, which is the natural but distressing reaction to demands or “pressures” that the person perceives they cannot cope with, at a given time”. It is important to keep in mind that stress can occur when an individual perceives that they have either an insufficient level of pressure, or an excessive amount of pressure.

Stress can also be a very transient experience. Situations that individuals find they are unable to cope with, may change from day to day and from week to week, depending upon a host of different factors. The word “Individual” is most important in the field of stress management. What will cause stress for one person, at a specific point in time, may not for another person. This is equally true for organisations.

Stress is now recognised as a very serious health and safety issue that all organisations, however large, or however small, must take steps to prevent.

23:2 An Effective Stress Management Strategy:

Concept Metal Products Ltd have a comprehensive and proactive stress management strategy that involves three elements, namely primary, secondary and tertiary levels. The selection of an appropriate level of control will depend on an accurate initial assessment of the source of the problem.

Primary:

The primary level is concerned with identifying the problem causes of stress, plus the level of risk to individuals and the organisation as a whole. This will be achieved through the process of risk assessment. For this level of intervention to be effective, it is vital that all of those involved, both understand the issue of work-related stress and are committed in taking action.

Secondary:

The secondary level sets out to improve the overall situation in the workplace by implementing the recommendations identified in the risk assessment. This is likely to include helping employees to recognise and deal with the causes of stress, for example, by providing appropriate “Stress Awareness Training”. Other recommendations that may be identified could be the need for Management Training, for example, communication skills, interpersonal skills, team building and also investigations into any reported incidents of harassment, discrimination, bullying etc.

Tertiary:

When individuals are experiencing stress, their overall behaviour may change. For example:

- a Persons may become withdrawn:
- b The standard of the person’s work may suffer:
- a. Persons may report in sick more frequently:
- b. Persons timekeeping may alter, they may start coming in very early, or working very long hours:
- c. Persons may become short tempered, irritable or cynical.

CONCEPT METAL PRODUCTS LTD

COMPANY HEALTH AND SAFETY POLICY MANUAL

23:0 Stress at Work (Continued):

The tertiary level acknowledges that in many organisation, some individuals may develop stress-related problems and accordingly may need support. The support can come from one or more of the following sources:

- a The Supervisor:
- b The Maintenance Manager:
- c The Health and Safety Consultant:
- d Employees Assistance Programme:
- e External National Support Lines:

23:3 Identification of Stress and its Sources:

When identifying the possible sources of work-related stress, it is important to be aware of the following:-

- a. Work-related stress is the harm or injury that can occur as a result of occupational stressors. These stressors, not their effects, are the “hazards”:
- b. Even though individual stress responses to a particular stressor may vary from one person to another, this does not preclude something from having the potential for harm:

Examples of Qualitative Methods are as Follows:

- a Talking to Staff:
- b Carrying out Performance Appraisals with Staff:
- c Formulating Focus Groups:
- d Managing Staff Attendance:

Examples of Quantitative Methods are Inclusive of:-

- a Maintaining Sickness/Absence Data:
- b Use of Questionnaires:
- c Maintaining Productivity Data:
- d Maintaining Staff Turnover Statistics:
- e Maintaining Other Statistical Records:

23:4 Stress Policy:

Section 2 of the **Health and Safety at Work etc. Act 1974**, requires all employers with five or more employees, to produce a written Health and Safety Policy Statement, regarding the health, safety and welfare of employees at work. A “**Stress Policy**” should be a part of the Concept Metal Products Ltd Health and Safety Policy Manual. In order to be effective, it should recognise stress as a health and safety issue and be endorsed at the most senior level within the organisation:

23:5 Roll of Company Management:

Company management have a key role in the management of work-related stress. They are in a position where it may be possible for them to spot the signs of stress in members of their staff at an early stage and take appropriate action to prevent it developing into something more serious:

It is Very Important that Management are Correctly Trained to the Following Standard:

- a to be able to recognise any signs of stress in their staff:
- b to know how to approach an employee exhibiting signs of stress:
- c to be capable of conducting ongoing Risk Assessments for stress:
- d to understand the Legal Implications of stress and be equipped with the necessary skills, in order to ensure that they are complying with the Law, to ensure the health, safety and welfare of their staff:

- e to recognise how they may be contributing to their staff members stress levels and how they could perhaps change for the benefit of all:

All Concept Metal Products Ltd Management are fully aware of the implications and requirements to control work-related stress within the workforce and always endeavour to meet these requirements fully, and to the best of their ability:

24. “OCCUPATIONAL DERMATITIS”:

Skin infections, inclusive of Dermatitis and Eczema, can arise in many industrial situations and they are a common cause of absence from work, due to illness. Although certain substances are usually associated with dermatitis, in some situations the ambient environment may be just as much of a problem. For example, air-conditioned buildings result in warm, dry offices during the winter months and this may cause dry, itchy skin. Occupational Dermatitis affects virtually all industries and businesses. Signs of this can be redness of the skin, itching of the skin, scaling and blistering of the skin. Should the dermatitis get worse, the skin can crack and bleed and the dermatitis could spread all over the body. It could be severe enough to keep the sufferer off work and possibly serious enough to force the sufferer to have to change their occupation. If the symptoms of dermatitis are spotted early and adequate precautions are taken, most people will make a full recovery, HOWEVER, SOME PEOPLE CAN BE AFFECTED FOR LIFE.

24:1 WHAT ARE THE HEALTH EFFECTS OF DERMATITIS?

The condition of dermatitis is still misunderstood by many people as being contagious and this attitude has proven very difficult to overcome. The facts are that dermatitis is rarely contagious and those who are affected show a marked variation of susceptibility.

The length of time for occupational dermatitis to become apparent is dependant on mainly three factors, which are, 1. the substance itself, 2. the strength and potency of the substance, 3. for how long and how often the substance touches the skin. Some substances may affect you almost on the first day of contact; some substances may take weeks, months or even years to cause occupational dermatitis.

Dermatitis usually affects the hands or forearms, the places most likely to be in contact with the substance. But can also become apparent on the face, neck or chest, if in contact with certain types of dusts, liquids and fumes. Dermatitis can even spread to parts of the body that have not been in contact with the substance. **Dermatitis can be very painful for the sufferer, but with thought and care, most cases can be prevented.**

At Concept Metal Products Ltd – High risk occupations are:

- **Maintenance** – Handling Oils and Solvents
- **Welders** – Using solvents to clean down work prior to welding.

Skin problems can be broadly classified into THREE GROUPS:

GROUP 1: CONTACT DERMATITIS:

This condition is caused by repeated contact with certain agents, resulting in the removal of the natural skin oils, which in turn causes the familiar drying and cracking symptoms associated with dermatitis. This surface damage leaves the skin very vulnerable to attack from other substances. It is usually the hands which become affected, although any skin which comes into contact with the causative agent may become damaged. In severe cases, the problem may spread to other parts of the body.

NATIONALLY BETWEEN 5 TO 10% OF MACHINISTS ARE AFFECTED BY DERMATITIS, CAUSED BY WORKING WITH COOLANT & METAL WORKING FLUID

CONCEPT METAL PRODUCTS LTD COMPANY HEALTH AND SAFETY POLICY MANUAL

24. “OCCUPATIONAL DERMATITIS” (CONTINUED):

24:1 WHAT ARE THE HEALTH EFFECTS OF DERMATITIS? (CONTINUED):

GROUP 2: ALLERGIC DERMATITIS (SENSITISATION):

This condition is caused by a reaction to specific “Trigger” substances, and although it is less common than Contact Dermatitis, its effects tend to be more serious. Allergies and the degree of reaction are specific to individuals. Once sensitisation to a specific substance has occurred, then a reaction will develop every time that substance is encountered. This means an acute primary diagnosis, usually by “Skin Patch Tests”, is essential in preventing a secondary reaction. The initial reaction in an allergic response may occur on first contact with the “Trigger” substance, or it may occur after many years. In some cases, the reaction may be so severe that the individual cannot continue with a given type of work.

GROUP 3: SKIN CANCER:

Skin cancer is often the result of prolonged exposure, over many years, to an adverse substance. In some cases, the causative agents are not known, or even suspected of being harmful, until the symptoms develop. The removal of recognised carcinogens from many industrial substances has obviously helped in controlling cancer initiation.

24:2 HOW CAN OCCUPATIONAL DERMATITIS BE PREVENTED?

- a. Wearing of the correct type of safety gloves can help to protect against chemical splashes when handling substances that can cause dermatitis. These protective gloves **MUST** be changed on a frequent basis and correctly disposed of:
- b. Using a barrier/moisturising cream before and after work activities. This will help replace the natural oils that the skin loses when washed, or when coming into contact with detergents and solvents:
- c. Wearing of a face-shield or full face mask, and the correct protective overall suits, should work activity be undertaken where liquids, fumes or dusts are apparent, which can cause dermatitis should the face, neck or chest be exposed to them:
- d. Always maintain the skin in a clean and hygienic condition:
- e. Ensuring that all required and issued personal protective equipment/clothing is maintained in a clean and defect free condition, at all times:
- f. Always ensure that your areas of work are maintained in a clean and tidy condition, inclusive of all equipment and tools:
- g. Should any diluted chemicals be used, ensure that they are diluted to the correct recommended strength. Should they be used over the recommended strength, they are more likely to cause dermatitis:

24:3 HEALTH SURVEILLANCE (SKIN CHECKS etc.):

Regular skin checks of all persons working with substances known to cause dermatitis MUST be undertaken. This is to ensure that any symptoms of dermatitis can be instantly spotted and the correct and required medical action be taken, on an immediate basis. Should any person spot any symptoms between these skin checks, they MUST be reported, again on an immediate basis. Should any person consult their own General Practitioner, with regard to any symptoms, the General Practitioner MUST be informed of the type of work activity being undertaken and the substance(s) being used. It is possible that if the symptoms do not subside, the General Practitioner will refer the person to a skin specialist, ideally one that specialises in occupational skin problems:

All Concept Metal Products Ltd Responsible Persons are fully aware of this regulation and endeavour to strictly adhere to the same by enhancement to all personnel, at all times:

CONCEPT METAL PRODUCTS LTD COMPANY HEALTH AND SAFETY POLICY MANUAL

25. CONTROL OF ASBESTOS: CONTROL OF ASBESTOS REGULATIONS 2012:

25:1 Under the CONTROL OF ASBESTOS REGULATIONS 2012 the Duty Holder (Concept Metal Products Ltd), and any self-employed persons used, shall ensure that account is taken of building plans, or any other relevant information and the age of the building. An inspection must be undertaken of the parts of the premises that are reasonably accessible and undertake an assessment of such, which must be regularly reviewed and further assessment if there is reason to suspect that the assessment is no longer valid. Also if there has been a significant change in the premises to which the assessment relates. Keep a comprehensive record of the conclusions of the assessment and every review.

The condition of any asbestos present, or any substance containing or suspected of containing asbestos, must be monitored under the plan of management of asbestos, ensuring that it is correctly maintained, or, wherever necessary, correctly and safely removed by a specialist and registered asbestos removal contractor.

The Regent Engineering Works was built when Asbestos Containing Products were still prevalent and some of the building structure contains Asbestos Containing Materials. The Canalside warehouse was built before asbestos was commonly used, but there is a risk that Asbestos Containing Materials could be present due to building modifications or in legacy equipment that has been installed on site.

Before undertaking modifications to the Hyde site, Concept Metal Products Ltd, will review a copy of the site Asbestos Register. If asbestos removal is required as part of an installation, the client will make arrangements for an HSE Licenced Asbestos Removal company. Concept Metal Products Ltd will not commence works until a Clearance Certificate has been produced stating that the work area is free from Asbestos Fibres.

Staff will pay attention to Asbestos labels displayed on site, and will not disturb any Asbestos Containing Materials (ACMs).



25:2 There are **THREE** main types of Asbestos, they are as follows:-

1. **Chrysotile (WHITE):**
2. **Amosite (BROWN):**
3. **Crocidolite (BLUE):**

However, they cannot be identified just by their colour:

BLUE and BROWN Asbestos are the two most dangerous forms of Asbestos, have not been imported into the United Kingdom for almost **20 Years** and their use was **BANNED in 1985**.

WHITE Asbestos was banned in **1999**.

25:3 **WHAT ARE THE RISKS FROM ASBESTOS?**

Working with Asbestos can release small fibres into the air. Breathing in these fibres can eventually lead to a number of **FATAL DISEASES**. These are inclusive of the following: -

- ❖ **Asbestosis or Fibrosis (Scarring) of the Lungs:**
- ❖ **Lung Cancer:**
- ❖ **Mesothelioma, a Cancer of the Inner Lining of the Chest Wall, or Abdominal Cavity:**

CONCEPT METAL PRODUCTS LTD COMPANY HEALTH AND SAFETY POLICY MANUAL

25. CONTROL OF ASBESTOS (CONTINUED): CONTROL OF ASBESTOS REGULATIONS 2012:

25:4 THERE IS NO CURE FOR ASBESTOS-RELATED DISEASES:

Asbestos-related diseases are currently responsible for up to 3700 deaths per year in the United Kingdom. There is usually a long delay between first exposure to Asbestos and the first symptoms of disease. This can vary between 15 and 60 years. The vast majority of those now dying were exposed to Asbestos between the 1950s and 1970s, before the current control regulations were introduced:

It is possible that repeated low-level exposures may lead to Asbestos-related diseases, although high exposure for long periods is linked more clearly to these illnesses:

Provided the Asbestos material is intact and in a position where it cannot easily be damaged, it will not pose a risk to health by releasing fibres into the air.

Many of the people suffering today from Asbestos-related diseases worked in the building and construction trades. They were carpenters, joiners, shop fitters, plumbers, electricians, gas service engineers etc. They were exposed to Asbestos fibres in their day to day work with Asbestos-containing materials, or because work with Asbestos was carried out near them:

25:5 HOW DOES ASBESTOS GET INTO THE BODY?

Although the body will get rid of the larger fibres that can enter the nose and mouth, tiny fibres can pass into the lower parts of the lung. They can stay there for years and in some cases, work their way through the lung lining. The body naturally gets rid of any Asbestos fibres that you might take in with food and water. Asbestos fibres cannot be absorbed through the skin:

25:6 WHAT TYPES OF BUILDINGS ARE LIKELY TO CONTAIN ASBESTOS?

Asbestos is likely to be present in a building if:

- ❖ **It was built or re-furnished between 1950 and 1980 and particularly;**
- ❖ **If it also has a steel frame; and/or**
- ❖ **It has boilers with thermal insulation:**

Asbestos cement has also been widely used as a building material, since the 1950s:

25:7 WHERE IS ASBESTOS FOUND IN BUILDINGS?

Many thousands of tonnes of Asbestos were used in buildings in the past. Much of this is still there and you cannot easily identify it from its appearance:

Its most common uses were:

- ❖ **Sprayed Asbestos and Asbestos loose packing. Generally used as fire breaks in ceiling voids:**
- ❖ **Moulded or preformed sprayed coatings and lagging, generally used in thermal insulations of pipes and boilers:**
- ❖ **Sprayed Asbestos mixed with hydrated Asbestos cement, generally used as fire protection in ducts, firebreaks, panels, partitions, soffit boards, ceiling panels and around structured steel work:**
- ❖ **Insulating boards used for fire protection, thermal insulation, wall partitions and ducts:**
- ❖ **Asbestos cement products, which can be compressed into flat or corrugated sheets; corrugated sheets are largely used as roofing and wall cladding; other Asbestos cement products include gutters, rainwater pipes and water tanks:**

**CONCEPT METAL PRODUCTS LTD
COMPANY HEALTH AND SAFETY POLICY MANUAL**

**25. CONTROL OF ASBESTOS (CONTINUED):
CONTROL OF ASBESTOS REGULATIONS 2012:**

25.8 ASBESTOS AWARENESS TRAINING

All Concept Metal Products Ltd staff are fully aware of these regulations and will ensure that any staff that may come into contact with Asbestos on a company worksite will attend an Asbestos Awareness Course. This will be Renewed on an Annual Basis.

ALWAYS TREAT ANY FORM OF ASBESTOS WITH RESPECT. SHOULD YOU COME ACROSS ANY SUBSTANCE THAT IS SUSPICIOUS AND COULD BE ASBESTOS, YOU MUST STOP WORK ON AN IMMEDIATE BASIS AND REPORT THE FACTS TO THE MANAGEMENT

CONCEPT METAL PRODUCTS LTD COMPANY HEALTH AND SAFETY POLICY MANUAL

26:0 HEALTH, SAFETY AND WELFARE REQUIREMENTS:

Workplace (Health, Safety and Welfare) Regulations 1992 (As Amended)

All Employers who employ person (For however short a period) **MUST**, so far as is reasonably practicable, provide adequate and appropriate Welfare facilities for their employees, whilst they are undertaking work activities within the workplace.

This means that the Concept Metal Products Ltd **MUST** provide such facilities, unless it is clearly unreasonable in terms of time, trouble, cost or physical difficulty.

If working on SITES, these facilities will be provided by either the PRINCIPAL CONTRACTOR OR THE CLIENT CUSTOMER, under their "DUTY OF CARE" (Section 3 of The Health and Safety at Work etc. Act 1974.

"Welfare Facilities" are facilities that are necessary for the well-being of employees, such as "Washing facilities, toilet facilities, rest and changing facilities, an clean eating and drinking facilities for employees during official break times":

26:1 Toilet and Washing Facility Requirements:

The following are the requirements for the provision of Toilet and Washing Facilities within the workplace:

- a. **The employer MUST provide enough toilets and washbasins for the number of employees expected to use them and MUST NOT be expected to queue for long periods in order to use these facilities.**
- b. **Where it is reasonably practicable, separate facilities for MEN and WOMEN should be provided. Failing this, rooms with lockable doors MUST be provided.**
- c. **Clean facilities MUST be provided, with adequate cleaning facilities.**
- d. **An adequate supply of toilet paper, and for FEMALE staff, a means of disposal of Sanitary Dressings, adequate supply of soap or other washing agents and a means of drying hands and forearms e.g. PAPER TOWELS, ROLLER HAND TOWEL DISPENSERS, or AIR DRYING FACILITIES and possibly SHOWER UNITS where this is a requirement e.g. for particularly dirty work or Emergency Safety Showers when working with Hazardous Substances.**
- e. **Ensure that there are HOT and COLD running water facilities and that the toilet/washrooms are WELL Lit and adequately VENTILATED.**

DISABLED PERSONS NEEDS MUST ALSO BE TAKEN VERY MUCH INTO CONSIDERATION.

THE LAW ALSO REQUIRES THAT EMPLOYERS MUST PROVIDE DRINKING WATER FACILITIES.

This MUST be free from CONTAMINATION and preferably from a PUBLIC WATER SUPPLY

(Bottled water dispensers are also acceptable as a secondary supply and the facilities must be easily accessible to all employees):

CONCEPT METAL PRODUCTS LTD COMPANY HEALTH AND SAFETY POLICY MANUAL

26:0 HEALTH, SAFETY AND WELFARE REQUIREMENTS (CONTINUED):

The following tables show the MINIMUM NUMBER of Toilets and Washbasins that MUST be provided by the Employer:

Table 1:

Number of Persons	Number of Toilets	Number of Washbasins
1-5	1	1
6-25	2	2
26-50	3	3
51-75	4	4
76-100	5	5

Table 2:

Number of Men	Number of Toilets	Number of Urinals
1-15	1	1
16-30	2	1
37-45	2	2
46-60	3	2
61-75	3	3
76-90	4	3
91-100	4	4

In the event of employees undertaking work activities in REMOTE WORKPLACES, which are without SUITABLE PLUMBING or a WATER SUPPLY.

- Concept Metal Products Ltd, or the Principle Contractor will be required to provide CHEMICAL TOILET and WASHING FACILITIES, such as WATER CONTAINERS:

In the event of employees undertaking work activities at a TEMPORARY WORKSITES, the employer, so far as is reasonably practicable, will need to provide FLUSHING TOILETS, and RUNNING WATER. Portable cabins converted into TOILET FACILITIES will possibly need to be hired. Should this not be practicable, alternatives such as CHEMICAL TOILETS AND WATER CONTAINERS MUST be considered.

CONCEPT METAL PRODUCTS LTD COMPANY HEALTH AND SAFETY POLICY MANUAL

26:0 HEALTH, SAFETY AND WELFARE REQUIREMENTS (CONTINUED):

26:1 Toilet and Washing Facility Requirements (Continued):

26:2 Changing and Storage of Clothing Facilities:

In the event of employees work activities requiring them to change into and wear SPECIALIST CLOTHING (Overall suits, a uniform, thermal clothing etc.) the employer MUST provide enough CHANGING ROOMS for the number of employees expected to use them:

The Provided Changing Rooms MUST BE as follows:-

- a. They MUST be readily accessible to all employees:
- b. They MUST contain, or lead directly to, clothing storage and washing facilities:
- c. They MUST also be provided with seating facilities:
- d. They MUST be provided with means for hanging clothes, a hook or peg may be sufficient for this purpose:
- e. They MUST ensure the privacy of the users:

Separate changing room facilities MUST be provided for MEN and WOMEN and the Employer must try to prevent the employees own clothing coming into contact with WORK-SOILED CLOTHING, or from getting dirty or wet. The employer MUST provide separate storage for clean clothing and contaminated clothing, which allows WET CLOTHING to be hung up to dry out during the course of the day and that the changing rooms are well ventilated:

Even when all of the above has been fully provided, the employer MUST also ensure that these facilities are maintained in a clean, tidy and good condition. This will require the employer to implement an effective system, in order to maintain to a high standard, inclusive of regular cleaning.

CONCEPT METAL PRODUCTS LTD COMPANY HEALTH AND SAFETY POLICY MANUAL

27:0 COMPANY VEHICLE ROAD SAFETY PROCEDURES:

CONCEPT METAL PRODUCTS LTD COMPANY VEHICLES:

- 27:1** All Concept Metal Products Ltd company vehicles, inclusive of vans used by supervisors and operatives **MUST** be fully roadworthy and correctly serviced, as per the manufacturers requirements, at all times. This will be inclusive of a current M.O.T. Certificate (If Applicable), fully road taxed and fully insured. Vehicle checks **MUST** be undertaken by the drivers, in order to enhance this roadworthiness and all defects observed **MUST** be reported to the company management, on an immediate basis and the vehicle taken off the road until the observed faults are rectified.
- 27:2** Possible risk of being involved in a road traffic accident due to the following aspects: Vehicle road worthiness, vehicle weight, driver fatigue and stress, using mobile telephone, other road users, road conditions, weather conditions, traffic jams, contours, detours, under the influence of alcohol or drugs, exceeding maximum recommended driving times without taking a break, exceeding the designated speed limit.
- 27:3** Also with regard to roads and highways encountered and the risks and hazards attached to these. They will be inclusive of traffic jams, contours, detours, other road users, vehicle condition and road worthiness, ensure correct vehicle weight is adhered to when carrying any equipment required, driver stress and fatigue due to distance being travelled, weather conditions, road speed limit etc. All Company Driver Field Staff must be made fully aware of these facts and of the action to take if confronted with such risks and hazards.
- 27:4** Extreme care and caution to be exercised at all times whilst travelling to and from arranged visits to client premises. Ensure, before travelling, that the vehicle is fully roadworthy (Taxed, M.O.T., Insured, Current Driving Licence) and that it is not overloaded in any way. Holding and answering any mobile telephone facilities **MUST NOT BE UNDERTAKEN** whilst driving, no matter what the circumstances. Be fully aware of other road users and the possibility of their actions with regard to adhering to driving and weather conditions, and behaviour on the road and when involved in traffic jams, contours and detours. Strict adherence to all road traffic signs and speed limits, at all times. **DO NOT** consume any alcohol or take any unnecessary drugs whilst travelling to and from the Principal Contractor or client/customers contracted sites. If fatigued or stressed, pull in and take a break from travelling (Recommended maximum driving time is 2 hours without a break).

Driving is a very hazardous occupation, it becomes more so if the above are not strictly adhered to, at all times: The Remedial Action required by CONCEPT METAL PRODUCTS LTD, Company Driver Field Staff, whilst at the Principal Contractor or Client/customers contracted sites, must be of the following:-

Extreme care and caution to be exercised at all times whilst undertaking arranged visits at Principal Contractor or client/customers contracted sites. Request that the Principal Contractor or client/customer makes all visiting Company Driver Field Staff fully aware of all risks and hazards highlighted within completed risk assessments, before any form of visit is undertaken. Strict adherence to all Principal Contractor or client/customers health and safety, fire and first aid procedures, inclusive of completed risk assessments, at all times whilst on the Principal Contractor or client/customers contracted sites.

CONCEPT METAL PRODUCTS LTD COMPANY HEALTH AND SAFETY POLICY MANUAL

28:0 MANUAL HANDLING OPERATIONS:

(IN ACCORDANCE WITH THE MAUNUAL HANDLING OPERATIONS REGULATIONS 1992 (AS AMENDED 2002)

28:1 Manual Handling Arrangements

Concept Metal Products Ltd – will undertake Manual Handling Risk Assessments using the principles outlined in the HSE Approved code of Practice:

Avoid – Avoid Manual Handling – Use a Mechanical Aid

Reduce – Reduce the size / weight of the load

Risk Assess – Using the TILE approach

TASK – Can the Task be avoided, can the distance the object has to be moved be reduced?

INDIVIDUAL – Does the load put a particular individual at Risk?

LOAD – How Heavy is the load? Does the Load have an odd centre of gravity? Shape and Size of Load? Intrinsic Hazards – Sharp edges, Hot, Cold etc?

ENVIRONMENT – Does the environment pose any hazards? Hot, Cold, Slippery, Windy etc.

28:2 Considerations To Bear In Mind When Undertaking Any Manual Handling Task:

1. The Manual Handling Operations Regulations 1992 (As amended 2002) state, “Does this item really need manually handling, or can it be done in any other way”, i.e. by use of mechanical handling equipment, forklift truck, pallet trucks etc. If mechanical handling can be used, then this should be adopted.
2. There is no stipulated maximum safe manual handling weight. There is however, a maximum recommended safe manual handling weight of 25kg, but this is only a recommended safe manual handling weight.
The only person who can determine what can be safely lifted, is YOU. Other factors that must be taken into consideration are as follows:-
 - a. The physical suitability of the employee to carry out the operations;
 - b. The clothing, footwear or other personal effects he/she is wearing;
 - c. His/her knowledge and training;
 - d. The results of any relevant risk assessment carried out pursuant to Regulation 3 of the Management of Health and Safety at Work Regulations 1999 (As Amended 2006);
 - e. Whether the employee is within a group of employees identified by that assessment as being especially at risk; and
 - f. The results of any health surveillance provided pursuant to Regulation 6 of the Management of Health and Safety at Work Regulations 1999 (As Amended 2006);
 - g. Determine whether or not you can handle the manual handling task yourself, or do you require some assistance:
3. Before any manual handling task is undertaken, the following should also be taken into consideration:

INDIVIDUAL CAPABILITY e.g.

THE LOAD e.g.

THE TASK e.g.

THE ENVIRONMENT e.g.

Age, State of Health, Size, etc.

Size, Shape, Difficult to Grasp, etc.

Standing, Sitting, Stooping, Twisting, etc.

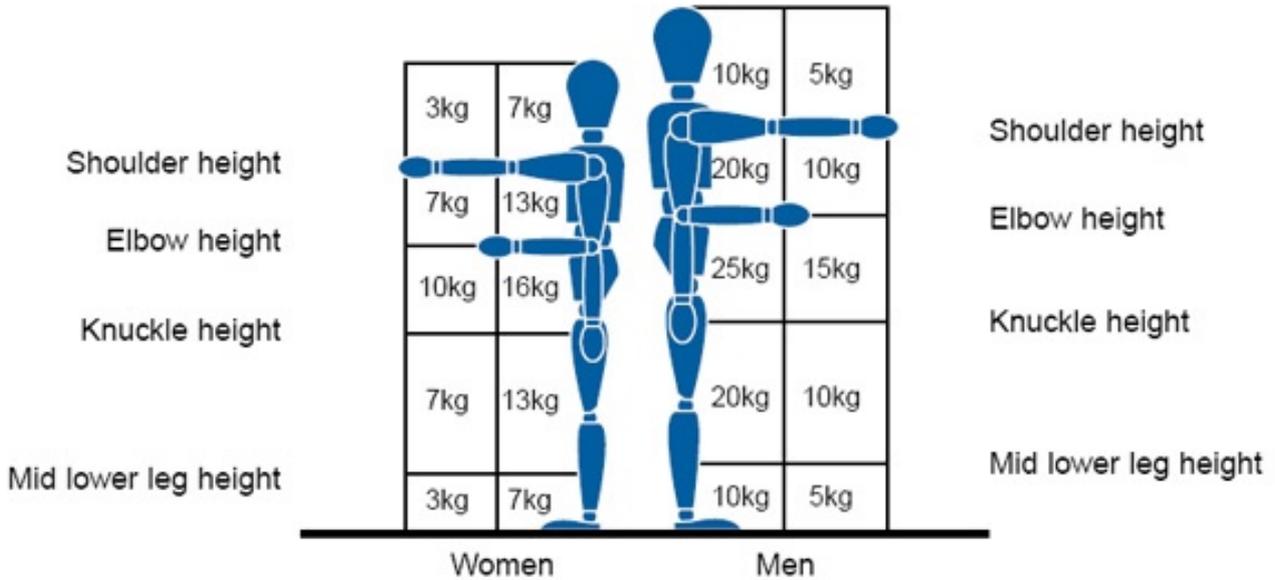
Lighting, Floor State, Stairs, etc.

CONCEPT METAL PRODUCTS LTD COMPANY HEALTH AND SAFETY POLICY MANUAL

28:0 MANUAL HANDLING OPERATIONS:

(IN ACCORDANCE WITH THE MAUNUAL HANDLING OPERATIONS REGULATIONS
1992 (AS AMENDED 2002) (CONTINUED):

HSE Manual handling requirements



MEN:

LIFTING

FROM:

Shoulder Height:
Elbow Height:
Thigh Height:
Knee Height:
Floor Height:

**CLOSE
TO BODY:**

10 KG
18 KG
25 KG
18 KG
10 KG

**AT ARMS
LENGTH:**

5 KG
10 KG
15 KG
10 KG
5 KG

WOMEN:

LIFTING

FROM:

Shoulder Height:
Elbow Height:
Thigh Height:
Knee Height:
Floor Height:

**CLOSE
TO BODY:**

7 KG
13 KG
16 KG
13 KG
7 KG

**AT ARMS
LENGTH:**

3 KG
7 KG
10 KG
7 KG
3 KG

CONCEPT METAL PRODUCTS LTD

COMPANY HEALTH AND SAFETY POLICY MANUAL

29.0 ELECTRICITY AT WORK

29.1 FIXED WIRING

All fixed electrical wiring and equipment in situ at the Concept Metal Products Ltd Workshops in Middleton will be subject to a Fixed Wire Inspection every 5 years. This will be conducted by an accredited electrical engineer, in accordance with the IEE 17th Edition Wiring Regulations.

Any remedial works required will be undertaken, before the installation is certified and labelled as been safe to use.

No employee will be allowed to make alterations or undertake repairs to the Fixed Wiring unless they hold a IEE 17th Edition Qualification.

29.2 PORTABLE APPLIANCES

All portable electrical appliances with an output voltage above 50V will be subject to Portable Appliance Testing. Items that are approved will bear an approved PAT label. The frequency of testing depends upon the conditions the equipment is used in, i.e. site extension leads will be subject to more frequent testing than, office equipment.

29.3 SITE ELECTRICAL EQUIPMENT

Concept Metal Products Ltd will in the first instance provide staff with battery operated tools and equipment to avoid the need to use electricity on site. These will normally be 18-36V Hand Tools such as Drills etc.

Where Electrical Tools are required on site / workshop, the site operates a 110V Policy, whereby tools are 110V and are used with a Centre Tapped to Earth (CTE) transformer box – which limits electric shocks to 55V by halving the voltage.

All 110V Tools and CTE Transformer boxes will be subject to PAT Testing.

29.4 PERSONAL ELECTRICAL ITEMS

Concept Metal Products Ltd prohibit employees from bringing in their own personal electrical items, i.e. Heaters, Toasters, Radios etc.

Any personal equipment brought into the business or a customer site, will be removed from service during routine Health and Safety Inspections.

(FOR ISSUE TO ALL CONCEPT METAL PRODUCTS LTD EMPLOYEES, ON THE INITIAL INDUCTION PROGRAMME AND ALL EXISTING EMPLOYEES)

The Appointed Person responsible for health and safety on site is:-

The Company Maintenance Manager : Andy Galvin

(Appointed Supervisor On Sites): TBC

**Contracted Health and Safety Consultant: Richard Smith OTC
Consultancy Ltd**

Who is located at:-

**Workshop, or Office:
(On Site):**

(To be completed by the responsible person undertaking the Initial Induction training programme for Employees, prior to issue)

The receipt attached to this extract must be signed and retained for personnel record purposes.

**CONCEPT METAL PRODUCTS LTD
COMPANY HEALTH AND SAFETY POLICY MANUAL**

WRITTEN POLICY STATEMENT ON HEALTH AND SAFETY

**THIS SHEET IS TO BE COMPLETED FOR EACH EMPLOYEE ON JOINING
CONCEPT METAL PRODUCTS LTD, ON THE INDUCTION PROGRAMME**

To: _____ **Employee Name (Block Letters):**

- 1. The attached extract of the Written Company Health and Safety Policy Manual for Concept Metal Products Ltd and is issued to you for your retention.**
- 2. You are to ensure that you have read, noted and fully understood the contents of the extract and fully agree to strictly adhere to and abide by all Company safety rules and procedures, at all times whilst employed by the Company.**
- 3. Please sign and date the certificate below.**

Date: _____

Employer Signature: _____

On Behalf Of: Concept Metal Products Ltd :

CERTIFICATE

Certified that I have today, received a copy of the extract from the Concept Metal Products Ltd Written Policy Statement on Health and Safety and have read, noted and fully understand its contents and fully agree to strictly adhere to and abide by all Company safety rules and procedures, at all times whilst employed by the Company.

Date: _____

Employee Signature: _____

Work Location: _____

**CONCEPT METAL PRODUCTS LTD
COMPANY HEALTH AND SAFETY POLICY MANUAL**

COMPANY HEALTH AND SAFETY POLICY MANUAL

MONITORING REPORT

This Risk Assessment Form must be completed by the Contracted Health and Safety Consultant, on a Six Monthly Basis:

Current Assignment Risk Assessment Reviewed:	Yes:	No:
	_____	_____
Review Date Current:	Yes:	No:
	_____	_____
Review Date Expired:	Yes:	No:
	_____	_____
Any Further Risks/Hazards Apparent:	Yes:	No:
	_____	_____

Comments:

Contracted Health and Safety Consultant:

Name In Print: Richard Smith:

Position: Health and Safety Consultant:

Signature: _____

Date Of Monitor: _____

Distribution:-

Maintenance Manager :
Other Company Directors:
Contracted Health and Safety Consultant:
Company Health and Safety Files:

Company Health and Safety Policy Manual Monitoring Sheet.

APPENDIX 1

COMPANY ENVIRONMENTAL POLICY

1. ENVIRONMENTAL POLICY STATEMENT

The policy of Concept Metal Products Ltd is to encourage respect for the environment and the adoption of an environmentally responsible attitude in the fulfilment of business objectives.

The pursuit of this policy will require the Company to focus attention upon the following key principles:

- Compliance with all relevant Environmental legislation.
- Commitment to prevention of pollution and improvement in environmental performance.
- Promote awareness amongst employees of the importance of environmental issues.
- Conserve energy and water and manage their use efficiently.
- Implementation of waste minimisation programmes.
- Encourage the use of re-cycled materials where appropriate.
- Provide the necessary information to enable employees/learners to operate the processes efficiently and in an appropriate environmental manner.
- Assess the environmental impact of new capital projects as part of the approval process.
- Maintain the appearance of the Company premises to high standards.
- Set reasonable environmental targets and monitor performance.
- Report significant environmental performance changes and improvements to employees

Policy Approved: Andy Galvin (Maintenance
Manager)

Signature: *A. Galvin*

Date:

2nd February 2016

2. ORGANISATION AND DUTIES

The following section is intended to explain the major environmental responsibility of individuals within the Company structure.

The lists shown are not intended to be exhaustive.

2.1 MAINTENANCE MANAGER

The provision of the appropriate management framework for the Company Environmental Policy and its regular monitoring, and the regular review with the management team of its effective implementation. See also the duties of Managers and Employees.

2.2 EHS ADVISOR

The duty of the EHS Advisor is to advise, guide and assist management to achieve the aims and objectives set out in its Environmental Policy statement, and collect and report factual data to management. To this end, duties include:-

- Advising on environmental aspects in the design and use of plant and equipment, and assistance with approval of new equipment before commissioning.
- Advising on the environmental precautions necessary in the introduction of chemicals and processes, which may be hazardous.
- Advising of legal requirements in respect of environmental protection at work.
- Maintaining liaison with other departments or personnel for environmental matters, also such official bodies as the local Environmental Health Department and the Environment Agency.
- Keeping up to date so far as is necessary in relation to the workplace and the risk present in the area of the protection of the environment.
- Devising general Environmental Training and implementing both general and specific training in the Company. These courses to be repeated at appropriate intervals. All new employees to be instructed as soon as possible after commencement of employment or training programme.
- Carrying out periodic internal/external environmental audits and inspections of both the Company premises and waste disposal contractors, to report upon the results of such inspections, to make recommendations for remedying any defects found, and to ensure correction.
- Providing for the investigation of causes of any environmental incidents and of the circumstances leading to the incident, the compilation of the necessary incident reports, and tendering advice to prevent recurrences.
- Arrangements for the disposal of General and Hazardous waste.
- Arrangements for the re-cycling of suitable waste.
- Providing an Emergency Management service, in conjunction with other key members of staff.

- Responsible for environmental monitoring in the areas of:

Temperature & Humidity

Lighting

Noise

Odours

Air quality

Water Quality

Drainage Systems

- Auditing, at regular intervals, of local exhaust ventilation systems within the Company to ensure that they are kept in good working order.
- To devise and manage an energy conservation programme, to keep records of such conservation and to report results to management on a regular basis.
- To devise and manage a water conservation programme, to keep records of such conservation and to report results to management on a regular basis.
- Arrangements for the upkeep of the appearance of Company premises including the grounds.
- Arrangements for the upkeep of collection and/or treatment plants in good working order to prevent, so far as is reasonably practicable, pollution of the surface drains and sewerage systems.
- To implement energy efficiency improvements wherever possible.

2.3 SITE MAINTENANCE

Site Maintenance is in control of services on the site, which have the potential to cause harm to the environment. The duty of the Site Maintenance is to guide and assist management to achieve the aims and objectives set out in its Environmental Policy statement, and collect and report relevant factual data to management.

2.4 PRODUCTION MANAGERS

- Shall be responsible for the effective implementation of the Company Environmental Policy within his/her area of responsibility.
- Shall devise and implement all specific training needed to achieve environmental protection within his/her area of responsibility.
- Shall investigate any environmental incidents within his/her area of control, and ensure that corrective action is taken and documented to prevent a recurrence of the incident.
- Shall keep under review the necessity for, and act as necessary to ensure the introduction of, further measures, instruction and training to ensure the protection of the environment within his/her area of control.
- Shall ensure that the established environmental protection measures, systems of work, programmes of inspection, training and instruction are maintained in his/her area of responsibility.
- Shall arrange for any defects in environmental protection measures to be rectified.
- Shall instruct those under his/her control or within the department, precisely and clearly on their duties in respect to the protection of the environment within their work area
- Shall make himself / herself reasonably available to receive and discuss environmental queries raised by employees under his/her control.
- Improvements to the above aspects of performance.

2.5 COMPANY EMPLOYEES

Each employee has a legal responsibility for the attainment of adequate environmental standards in the workplace. There is a statutory duty placed on every employee under the Environmental Protection Act 1990, to take reasonable care for the protection of the environment.

Company employees

- Shall participate in prescribed training programmes in order to familiarise themselves with the requirements of the Company Environmental Policy.
- Shall observe the relevant environmental procedures and specifications at all times.
- Shall conform to all environmental instructions given by the appropriate manager or supervisor.
- Shall report all environmental incidents in the department to the supervisor.
- Shall co-operate with the Company's re-cycling programme.
- Shall co-operate with the Company's energy programme.
- Shall, where possible, reduce waste within their area of work.
- Should make suggestions to improve and protect the environment within the site to the appropriate Manager or Supervisor concerned, or to the EHS Advisor.
- Must report all potential or actual hazards to the environment to the manager or supervisor concerned.

3. APPLICATION

3.1 Energy Conservation

Energy management makes good business sense as it saves money as well as affording a degree of protection to the environment by reducing carbon dioxide emissions. Significant energy savings can be made with relatively minimal effort.

Electricity

Employees shall ensure during working hours, that any lighting in any areas which are not in use are switched off and that at the end of working hours prior to leaving the site that, if no other employees are working in the area, they switch off all lights in that area.

Any electrical equipment, which is not in use or on a programme for use, must be unplugged and the socket switched off.

Gas

Employees shall ensure during working hours, that any gas appliances or equipment which are not in use are turned off, and at the end of working hours prior to leaving the site, that all gas appliances & gas heating equipment are turned off.

Heating

Factory heating will be switched on during the winter months and during any periods of extensive inclement weather. Portable heaters must not be used without permission.

The heating system is on the Company's scheduled maintenance programme and regularly serviced to keep it in efficient working order.

3.2 Air Pollution

Extraction systems are available for use on processes requiring the removal of airborne pollutants from the atmosphere. Employees are encouraged to use these systems wherever possible to reduce the likelihood of air pollution within the workplace. The extraction systems are on a monitoring system and are regularly checked and serviced to ensure efficiency.

All boilers on the Company premises are regularly serviced and maintained to ensure efficient working order to prevent air pollution from burning fuel.

The burning of rubbish of any type is strictly prohibited on Company premises including the grounds. Confidential documents should be shredded on site or sent to confidential waste contractors for disposal.

3.3. Noise Pollution

The organisation will carry out noise assessments within and outside the factory (if required) to monitor the effects of noise on neighbouring properties. Aspects of the Company's activities which are found to affect the local community will be controlled to the lowest practicable level.

3.4 Water Management

The organisation will implement, wherever appropriate, methods of water conservation, re-cycling and reduction of trade effluent.

3.5 Waste Minimisation

Careful consideration will be given to the elimination or minimisation of waste at source and the re-cycling or re-use of materials will be implemented wherever it is felt that it is safe to do so, and that it is economical to do so.

3.6 Recycling

The organisation will introduce recycling programmes wherever reasonably practicable.

3.7 Waste Management

Disposal and transport of wastes off site will be carried out in a responsible manner with due regard to all environmental considerations. Discharge of trade effluent to sewer will be controlled as required by legislation. The Company will endeavour to minimise spillages and maintain good housekeeping as part of its system of ensuring legal compliance with Environmental Legislation.

3.8 Hazardous Chemicals/Radioactive Materials

Substances containing Chlorofluorocarbons (CFCs) and 111-Trichloroethane will not be permitted to be used within the company.

No radioactive substances are or will be used by the Company.

3.9 Purchasing

Consideration will be given to environmental issues when purchasing raw materials and products necessary for the business.

The organisation will aim to improve its process efficiency and thereby reduce its raw materials usage. Where the Company considers it to be commercially and reasonably practicable, it will introduce alternative materials which will reduce the demand on natural resources (e.g. recycled paper).

3.10 Up keeping Appearance of Company Premises

Plans for new buildings, alterations and developments on the site will include an environmental assessment.

All buildings and grounds belonging to the Company will be kept in a good state of repair, in a tidy state and litter free so far as is reasonably practicable.

3.11 New Projects and Refurbishments

The organisation will assess all new machinery, materials and new processes for environmental impact.

3.12 Monitoring

Regular environmental monitoring will be carried out by either the Company EHS Advisor, or Maintenance personnel and/or regulatory bodies in the following areas:

- Air monitoring
- Lighting
- Noise
- Odours
- Temperature & humidity
- Extraction systems
- General & Hazardous waste disposal
- Trade effluent

Records of all relevant monitoring will be kept for suitable or legally required periods depending on the type of monitoring.

3.13 Training

Concept Metal Products Ltd will:

Make all employees aware of the Environmental Policy and objectives and their responsibilities within the Policy.

Identify and implement suitable employee training for all employees including Management to cover the relevant environmental issues.

APPENDIX 2

EQUAL OPORTUNITIES POLICY

Concept Metal Products Ltd is committed to ensure that the talents and resources of employees are utilised to the full and that no applicant or employee receives less favourable treatment on the ground of sex, disability, marital status, sexual orientation, creed, social class, colour, race or ethnic origins or is disadvantaged by conditions or requirements which cannot be shown to be relevant to performance.

The company recognises and reflects the positive contributions of men and women of different social backgrounds, cultures, religions, abilities and sexual orientation.

The company aims to achieve its Equal Opportunity Policy by:

- Fulfilling its social responsibility towards its employees and the communities in which it operates.
- Recognising its legal obligations under Equality Act 2010.
- Reviewing periodically its selection criteria and procedures to maintain a system where individuals are selected promoted and treated solely on the basis of their merits and abilities, which are appropriate to the job.
- Seeking to give all Equal Opportunity and encouragement to progress within the organisation by implementing an ongoing action programme
- Distributing and publicising this policy statement throughout the Association and elsewhere as is from time to time appropriate.
- Providing facilities for any employee who believes that inequitable treatment has been applied to him or her within the scope of this policy to raise the matter through the appropriate grievance procedure.
- Where found necessary training will be provided for employees which will enhance their understanding of the need for an equal opportunity programme.

If after applying the Company procedures anyone found of committing an act of discrimination or harassment as explained above will be subject to Disciplinary Action.

The policy also extends to the conduct of employees when attending work related functions and courses. Employees need to be aware that they are representatives of the company at social events which are related to work.

Policy Approved: Andy Galvin (Maintenance Manager)	Date:
Signature: <i>A. Galvin</i>	2 nd February 2016

This policy to be reviewed no later than 12 months from date

Appendix 3

DRUGS AND ALCOHOL POLICY

1. INTRODUCTION

The possession, use, supply or production of some drugs is a criminal offence under the Misuse of Drugs Act 1971 (2002).

Under the Act it is a criminal offence for the Company to:

Knowingly permit or suffer any of the following activities to take place on its premises, that is to say:

- a) Producing or attempting to produce a controlled drug in contravention of section 4(1) of this Act;***
- b) Supplying or attempting to supply a controlled drug to another in contravention of section 4(1) of this Act, or offering to supply a controlled drug to another in contravention of section 4(1) of this Act;***
- c) Preparing opium for smoking; or***
- d) Smoking cannabis, cannabis resin or prepared opium***

Not only does the Company want to do all in its power to discourage drug misuse but also is mindful of its statutory obligations. Consequently, if the Company is aware of such activities. It will be obliged to take action, which would include reporting such actions to the police and taking disciplinary action against the employee, which could lead to dismissal.

If the conduct of any employee poses dangers to other members of staff or to the good name of the Company, the Company will be obliged to take action to protect its employees from risk or danger.

2. POLICY

The Company will seek to ensure that all employees enjoy a safe and secure environment. It has adopted a policy, which aims to ensure that drug and alcohol misuse can be identified and the necessary help given but will also reserve the right to use more serious actions if the particular case warrants it.

The use of soft drugs whilst on Company premises will not be tolerated as it puts employees at unacceptable risk. Any employee found taking such drugs would be subject to disciplinary action, which could lead to dismissal. Any employee attending work and suspected of being under the influence of such drugs shall be sent home until such time as they are fit for work. Proof of fitness for work will be the responsibility of the individual employee in the form of a letter from their GP for which they may be required to pay.

This section does not include drugs prescribed by the employees own GP to treat a medical condition on the understanding that the GP has stated that it is safe to attend work (e.g. that the drug will not affect the employees concentration whilst operating machinery etc.).

The consumption of alcohol on Company premises will not be tolerated as it puts employees at unacceptable risk. Any employee found taking alcohol whilst on Company premises would be subject to disciplinary action, which could lead to dismissal. Any employee attending work and suspected of being under the influence of alcohol shall be sent home until such time as they are fit for work.

Any employee found to be **using or supplying illegal drugs** will be reported to the police and will be subject to automatic dismissal.

Any employee suspected or proven to be addicted to drugs or alcohol will be expected to attend counseling at their own expense. Addiction is defined as the consumption of alcohol, drugs or any other substance, which continually or repeatedly has a detrimental effect on any employee's work performance/attendance.

No drugs in any form shall be issued by the Company First Aiders.

Policy Approved: Andy Galvin (Maintenance Manager)	Date:
Signature: <i>A. Galvin</i>	2 nd February 2016

This policy to be reviewed no later than 12 months from date

Appendix 4

EHS Advisor CV

XXXXXXXXXX
Todmorden
Lancashire
UK
OL14 7ER

Home XXXXXXXXXXXXXXXX
Mobile +44 (0)7447 189868
E-mail
rcstrainingconsultants@gmail.com

Richard C. Smith

Personal Profile

- I am an enthusiastic EHS Practitioner, with a proven track record in a variety of industries including aerospace manufacturing and railway construction and maintenance. I am NEBOSH Diploma qualified and have won multiple awards for my achievements, improving EHS performance in all of my EHS roles to date. I am now looking to work as a freelance EHS consultant providing EHS Advice, training and auditing services UK wide.
- Experience working with UK regulatory authorities including UK Health & Safety Executive, UK Environment Agency, Water Authorities, Local Authority (Air), UK Health Protection Agency, HM Fire Inspectors and HM Railway Inspectorate.
- Good interpersonal skills and an ability to communicate with staff at all levels of the organisation. Proven training / teaching background with ability to influence people.

Experience

RCS Training and Consultancy Ltd

Feb 2013 -

Freelance Environmental, Health and Safety Trainer / REC First Aid Instructor

- Delivering CCNSG Passport to Safety, IOSH Managing Safely and IOSH Working Safely, CIEH H&S, Fire Safety and Manual Handling for Training 2000, Oldham Training Centre, Burnley College & Calderdale Adult Learning
- 1st Aid Trainer – Paediatric / Emergency 1st aid for White Lee first aid training.
- REC Approved Outdoor Instructor – Delivering Outdoor 1st Aid qualifications for Scouting UK, DofE, Outdoor Centres and Calder Valley SRT Supporters group.
- EHS Consultancy Work – Oldham Training Centre / Elantra Investment / Training 2000.

GE Aviation Wales – Nantgarw, Cardiff

Feb 2012 – Dec 2012 – EHS, Maintenance, Facilities and Security Manager

Responsible for Management of EHS, Site Maintenance (Infrastructure and Production equipment), Fire Safety, Facilities and Site Security.

- Responsible for managing a 1,500,000 ft² aircraft engine repair facility. Specialising in the repair of Rolls Royce RB211, CFM56, GE90 and GP7000 Jet Engines for worldwide airline customers.
- Managing a team of 10 direct reports and 80 Facilities and Maintenance Staff.
- Implementation of new Crane Safety Program – management of 240 overhead cranes.
- Managed all phases of a new build construction project, to build an additional 3000m² Fan Case Centre of Excellence Manufacturing Facility. Built on time, on cost and with zero safety breaches or incidents.
- Implementation of Safety Improvements to the Aircraft Engine Test Cell Control Rooms, following small computer server fire.
- Management of land remediation project – to clean up legacy kerosene pollution from the site.

- Improved the on-site processes for the management and control of Asbestos containing materials.
- Improved the Fire Safety controls on site.
- Showcased EHS on BBC Breakfast TV – with a live outside broadcast to 7 million UK viewers. Business Correspondent Stephanie McGovern presented the business news from the Engine Test Facility, I managed PPE compliance, to ensure the correct safety image was presented on National TV.
- Management of the Global Star Safety System and implementation of a “Back to Basics” safety campaign to re-focus employees on the importance of safety, during their day-to-day activities.
- Attended the GE Aviation World EHS Summit – including delivering 2 presentations, to worldwide EHS Professional audience.

GE Aviation - Unison Engine Components – Burnley, Lancashire

2005 – Jan 2012 – Compliance Officer - Environment, Health and Safety

Responsibility for Management of EHS for Burnley Site (Fabrications and Repair) and Nelson Site (Fuel Injectors).

- Responsible for managing the implementation of GE Health and Safety and E-Frameworks.
- Managing the Trade Effluent Upgrade works in compliance with Environmental Requirements, and managing non-compliance issues with Waste water Regulator – now successfully resolved.
- Managing £300,000 Machine Guarding projects on both sites to achieve full compliance with Corporate and UK regulatory requirements.
- Managing upgrade work to High Risk Chemical Process Plant.
- Assisting with recruitment and compliance issues at UEC Tyseley (Birmingham), and UEC Poland – duties have included UK Regulatory Compliance Audit at UEC Tyseley prior to the GE Acquisition and providing technical EHS input and mentoring at the Dzierzoniow, Poland factory.
- Implementing the use of GE Gensuite system on the Burnley site.
- REACH – Managing the compliance requirements for the Burnley Businesses.
- Requested by HQ in Cincinnati USA to undertake Machine Guarding Audit at GE Aviation – Wolverhampton.
- Selected as one of the two European GE Aviation EHS Representatives to attend the Management Development Training course in Lisbon Portugal.
- Managing and maintaining ISO14001 Accredited Environmental Management System.

Prior to the GE Acquisition of Smiths Aerospace

- I regained the ISO14001 Environmental Management System accreditation for the business.
- Introduced and developed a thorough EHS Induction Program for all new starters to the business.
- Arranged for external UK Health and Safety Compliance audit to be undertaken on the business.
- Developed and Implemented a Health and Safety Management System based around the Health and Safety Executives HSG65 Model.
- Developed and delivered in house EHS training courses.
- Introduced Proactive Safety initiatives – safety tours, poster campaigns, tool box talks, housekeeping tours.
- Improved Reactive measurements – so company could monitor Accident Frequency Rates etc. This has led to a continuous reduction in Accident and Injury Rates over the last 5 years.
- Retrained employees in Risk Assessment techniques and implemented a Risk Assessment Programme across the business, the programme had not been reviewed for 5 years when I joined the business.
- I developed and maintained professional network contacts within the Aerospace Industry.
- Developed and maintained 4 business level Health & Safety committees with employee and management membership to manage safety and

environmental issues each month. Set up and managed main EHS committee and ensure full Executive attendance at these meetings to ensure EHS is kept as a business priority.

- Ensured compliance system was introduced to meet new UK Fire Legislation – including conducting Fire Risk Assessments for both businesses.
- Arranged for Dangerous Substances and Explosive Atmospheres Risk Assessment to be undertaken in Kerosene Calibration at Nelson Site, and redesigned all the fuel rigs, so that they met ATEX Zone 1 and 2 Requirements and installed fire suppression equipment.
- Influenced management to make £250,000 upgrade in LEV systems at both sites to provide greater Industrial Hygiene protection to workforce and to reduce Fire Risk.

Health, Safety and Environment Manager (UK)

2004 – 2005 PWME Limited (Charing, Kent)

Worked on several major Railway Engineering projects on the £10Billion - West Coast Route Modernisation Project for major companies including AMEC, First Engineering, Mott MacDonald and Network Rail

Other Duties included

- Putting tenders together for Channel Tunnel Rail Line Link Phase 2 and Network Rail Labour contracts.
- Preparation of Construction Health and Safety Plans for several projects undertaken by PWME Limited.
- Updating documentation to achieve ISO9001 (Quality Management) and ISO14001 (Environmental Management), as well as Link-Up approval.
- Safety and Environmental Tours on all PWME major projects.
- Developing all the Environmental Management Systems for PWME.
- Preparing and organising the data for Safety and Environmental KPIs
- Introducing and undertaking Alcohol Testing Program using Lion Alcometer.
- Consultancy Work for several companies including UK Rail Services (Portsmouth) , Norex Plant Hire (Staffs) Shovlin Plant Hire (Manchester)
- Awarded 2 Network Rail Safety Awards for contributions to Safety Management on Route 7 and Stockport Renewals Blockades.

Science Teacher

2001 – 2003 Wardle High School - Rochdale

1999-2001 Springhill High School - Rochdale

Direct Sales Representative

1997 – 1998 Headcount Field Marketing - East Midlands

Sales Administration

1997 Headcount Field Marketing - Nottingham

Education

NEBOSH Diploma In Occupational Health and Safety

Awarded in 2010 with Distinction

IEMA Certificate in Environmental Management

Awarded in 2005 Associate Membership gained by Examination

NEBOSH National General Certificate in Occupational Health and Safety

Awarded in 2003 with Credit

Post Graduate Certificate in Education (PGCE)

1998 University of Nottingham

Completed 3 school placements successfully and qualified as a teacher of science up to A – level standard.

BSc 2:1 Honours Degree in Biology

1994 – 1997 University of York

Studied Ecology, environmental biodegradation of industrial waste, land reclamation after heavy metal contamination from coal mining, marine ecology.

Awarded runner-up certificate by Shell for the Environmental Student of the Year for my project on plant physiology.

Additional Qualifications

Safety

- Graduate Member of the Institution of Occupational Health and Safety (IOSH) currently completing my IPD to achieve Chartered Membership status.
- UK Health Protection Agency - 1 day - Radiation Safety for Safety Managers
- Various GE Health and Safety Training Courses
- Lion Alcometer Training Certificate for random Alcohol Breath Testing
- Railway – Personal Track Safety (PTS) and Individual Working Alone (IWA)
- IATA Shipping Dangerous Goods by Air Certification
- ADR Shipping Dangerous Goods by Road Certification

First aid

- HSE First Aid at Work (3 day Certificate) Valid until June 2017
- REC Advanced 1st Aid Level 4
- REC 1st Aid Level 6 Instructor
- Instructor of Emergency 1st Aid at Work, Paediatric 1st Aid, HSW Refresher

Outdoor Pursuits

- UK MLTE Mountain Leader (Summer) Award
- 14 Years Mountain Rescue Experience with Calder Valley Search & Rescue Team – currently Equipment Officer.
- Rescue 3 International Swift Water Rescue Technician

Held position of Probationary Training Officer for 2 Years, and I am Casualty Care qualified.

Driving

- Full UK Driving Licence (Clean)
- ROSPA Defensive Driving 1 Day Course

- 4x4 Off road driving (British Military Instruction via Mountain Rescue)

Safety & Environmental Awards

- 2011 EMEA EHS Excellence Award - GE Aviation Global EHS Awards
- 2009 Most Improved Site Environmental - GE Aviation Global EHS Awards
- 2009 EHS Hero Award - GE Aviation Global EHS Awards
- 2007 Embracing GE Change Award - GE Aviation Global EHS Awards
- 2004 Network Rail Route Safe Award – Route 7 Blockade Project
- 2004 Network Rail Route Safe Award – SWIM Blockade Project

Interests

- Mountaineering
- Mountain Bike Riding