

# Policy: Health and Safety Policy Statement

**Date: 10<sup>th</sup> January 2022**

**Policy No: 1**

**Issue: E**

## Introduction

This Health and Safety Policy is produced in accordance with the requirements of Section 2 (3) of the Health and Safety at Work etc. Act 1974. The Health and Safety policy consist of three parts:

**Part 1:** The Statement of Intent and policy objectives;

**Part 2:** How responsibilities are assigned for achieving the objectives set out in part one;

**Part 3:** Related policies and procedures for implementing the Health and Safety Policy; and arrangements for measuring, monitoring and reviewing the company's performance in relation to Health and Safety.

## 1. Statement of intent & Policy objectives

The objectives and principles of the Health and Safety Policy are:

- To maintain an Health and Safety Management System which satisfies the requirements of ISO 45001:2018, all applicable statutory and regulatory requirements, industry best practice and any other Client specific requirements.
- To continue to satisfy the requirements of Avetta and Constructionline Safety Schemes in Procurement (SSiP) registrations
- To maintain workplaces to ensure that they are safe and without health risks, including means of access and egress, with adequate facilities and arrangements for employees' welfare.
- To provide and maintain working environments and safe systems of work for employees that are safe and free from health risks.
- To provide and maintain plant and equipment and operational controls that prevents injury and ill health.
- To ensure safety and absence of health risks in connection with the use, handling and storage of articles and substances.
- To consult with employees on issues relating to health and safety.
- To promote and encourage a positive health and safety culture throughout the organisation through the provision of information, training, instruction and supervision.
- To provide sufficient information, instruction, training and supervision to enable employees to avoid hazards and to contribute positively to the health and safety of themselves and others whilst at work.
- To establish effective arrangements to draw the Health and Safety Management

# Health and Safety Policy statement

System to the attention of employees so that they are aware of their obligations and carry out communication so it is understood and implemented by all employees.

- To ensure all employees are aware of their individual Health and Safety obligations under the Health and Safety at Work etc. Act. Management shall seek the support and co-operation of employees with respect to health and safety.
- To operate a 'balanced blame' culture based on behavioural safety, whereby employees are openly encouraged to report hazards, including near misses, without fear of reprisal to ensure the root causes of accidents are identified thus enabling measures to be put in place to eliminate recurrence.
- To ensure sufficient financial and physical resources are available to meet the objectives of the Health and Safety Management System, as well as all applicable statutory and regulatory requirements.
- To ensure health and safety objectives are set, monitored and reviewed at regular intervals.
- To maintain continual improvement of health and safety management and performance by regularly monitoring and reviewing the Health and Safety Management System to ensure its effectiveness.
- To update Company management in response to advances in technology, changes to industry best practice and new understanding in health and safety.
- To ensure that risk assessments are being carried out on an on-going basis, with employees participating in the risk assessment process. Assessments will cover undertakings and will assist in the identification of hazards and the setting of prioritised objectives for elimination and reduction of risk.
- To have access to competent advice regarding health and safety compliance
- To arrange for the effective planning, organisation, control, monitoring and review of preventative and protective measures.
- To maintain records as objective evidence to show compliance with the Health and Safety Management System.

Signed:



Print: N Thomas (Managing Director)

## Part 2 – Responsibilities

The company's senior management team considers health and safety to be an integral part of the management function and has assigned health and safety responsibilities as follows:

### 2.1. The Managing Director

The Managing Director has the overall responsibility for the Health and Safety Policy and Health and Safety Management System including formulation; development; implementation and encouraging commitment by personnel at all levels of the Company. The Managing Director maintains operational responsibility to ensure that arrangements are in place to implement the Company's Health and Safety Policy.

The Managing Director will:

- a) endorse and sign the Company's Health and Safety Policy and any revisions agreed by the HSEQ review group; and
- b) Seek the advice of the Company's senior managers through the HSEQ review group as appropriate to ensure that health and safety issues are considered and incorporated into the general planning, provision of resources and co-ordination of the Company's operations.

### 2.2 Depot managers & Office Manager

Local depot managers & the office manager will be responsible for co-ordinating the health and safety arrangements within their respective depots or departments and will be the focal point for receiving and disseminating health and safety information. They are responsible for the day to day implementation of the policy in each of the individual locations by:

- Disseminating the safety policy statement, fire safety information and other relevant health and safety information to staff, including temporary and visiting staff in their department;
- Receiving notifications from staff, visitors and others of accidents, incidents and unsafe situations that occur in their department or depot location, and taking any steps that may be necessary to implement remedial action e.g. notifying the HSEQ Manager;
- Liaising with the HSEQ Manager to ensure that staff within their unit receive appropriate health and safety training and keeping records of training undertaken;
- Seeking advice from the HSEQ Manager;
- Briefing the HSEQ Manager of a company Director on health and safety issues affecting their relevant department; and
- Ensuring there are sufficient numbers of fire wardens and first aiders for the areas occupied by their department.
- Ensuring that all training needs are monitored and advised to the HSEQ Manager as necessary.

## 2.3 Workshop Supervisors

Workshop supervisors are expected to co-operate with their Depot Manager to ensure that the Company's health and safety policies and procedures are implemented in the activities they manage.

As Line managers and supervisors of activities that may give rise to significant risks they must ensure that suitable and sufficient risk assessments are undertaken of these activities by those undertaking them to identify hazards and implement appropriate measures to control the risk and ensure that information on the control measures to be taken is communicated to all personnel involved in the task.

The workshop supervisor must review the risk assessments at appropriate intervals to ensure that the control measures are working as planned and the conclusions from the risk assessment remain valid.

Line managers and supervisors will, where appropriate and in conjunction with the depot manager or the company HSEQ Manager, develop safe working procedures for the activities they manage to ensure that any hazards arising from the activities are adequately controlled. They will ensure that all safe working procedures are understood and followed by the individuals undertaking the work.

Workshop supervisors will ensure that persons they supervise receive appropriate supervision, instruction, information and training to enable them to be competent to undertake safely the tasks assigned to them.

Workshop supervisors will co-operate with the Company's efforts to promote the wellbeing of its employees and minimise and avoid wherever possible potential stressors, by:

- Treating individuals reporting to them with consideration and dignity and promoting a culture of mutual respect in the teams they manage;
- Ensuring there is good communication within their team and there are opportunities for individuals to raise concerns about their work. Managers and their staff should seek advice from Human Resources business partner and the HSEQ Manager where appropriate;

Workshop supervisors will consult with the depot staff on health and safety issues arising from the activities they manage including outcome of risk assessments, changes in working practices or equipment and findings of either internal safety inspections, audits or statutory inspections.

## 2.4 Employees

All employees, regardless of their position within the School, have the following legal responsibilities under 'The Health and Safety at Work etc. Act 1974' and 'The Management of Health and Safety at Work Regulations 1999':

- To take reasonable care for the safety of themselves and others at work who may be affected by their acts or omissions;
- To co-operate with their employer and others in fulfilling statutory responsibilities;
- To notify their employer immediately of any situation which they have reason to believe might present a serious and imminent danger to their own or others' safety (in the context of the Company this means notifying the HSEQ Manger as soon as possible on 07960 014979); and
- To notify their employer of any shortcomings or perceived shortcomings in their health and safety arrangements, even when no immediate danger exists, so that appropriate remedial action can be taken (this will be done by notifying their line manager, workshop supervisor, or the Company's HSEQ Manager).

The Company requires all employees to fulfil the legal responsibilities set out above by cooperating in all matters concerning health and safety by:

- Adhering to the Company's arrangements and procedures for fire and other preventive and protective measures put in place to control and manage risks to the health and safety of employees and visitors;
- Reporting any accident, incident of verbal or physical abuse, near miss or equipment damage immediately to their line manager or workshop supervisor or the Company HSEQ Manager so that appropriate remedial action may be taken;
- Notifying their line manager or supervisor if they experience ill health that they have reason to suspect may be work-related, e.g. musculoskeletal problems as a result of using a computer or lifting, dermatitis from using cleaning chemicals etc.;
- Carrying out, as appropriate, regular visual checks of equipment before use, to identify any obvious defects. After taking any remedial steps they themselves can safely take, employees should report any defect in equipment, plant etc. to their line manager or HSEQ Manager or where appropriate the Technical Manager or Technical Director, who will be responsible for taking the necessary steps to ensure that the equipment is removed and or repaired;
- Using any equipment or items provided for work correctly and in accordance with manufacturers' or suppliers' instructions and any training received; and
- Treating fellow colleagues and other persons with whom they interact during the course of their work with consideration, respect and dignity. It is important that employees appreciate that their own actions and performance could be the source of stress to their colleagues.

## 2.5 The HSEQ Manager

The Company HSEQ Manager was appointed under the provisions of regulation 7 of the Management of Health and Safety at Work Regulations 1999 which require the Company to appoint one or more competent persons to advise and assist them with measures to comply with health and safety legislation.

The HSEQ Manager is responsible for providing advice on strategic and operational health and safety issues and developing and recommending policies, procedures and compliance strategies in line with best practice to ensure that the Company complies with its obligations under health and safety legislation.

The HSEQ Manager is responsible for:

- Reviewing and updating arrangements for implementing the Health and Safety Policy including monitoring compliance with the requirements for all safety policies and maintaining a central database of policy statements.
- Disseminating safety related information throughout the Company's depot network by producing and sharing safety alerts or bulletins.
- Providing advice and support to Depot and department managers and supervisors on day-to-day health and safety issues, assisting with the production of policy statements, and risk assessments,
- Acting as Adviser and Secretary to the Company's HSEQ review Group.
- liaising with and be the Company's point of contact with the Health and Safety Executive and Emergency Planning Authority's and other relevant organisations on health and safety matters.
- Conducting depot and department safety tours, inspections and audits
- Assisting in the implementation of any controls or changes required highlighted in inspections
- Procuring or developing and delivering safety related training
- Facilitating external audits of the Company's health and safety management systems
- Representing the Company at customer or supplier safety initiatives
- Assisting depot and or department managers in conduction investigations of disciplinary matters
- Maintaining the Company's ISO45001 accreditation
- Reviewing the requirements of the Company's engagement to SSiP registered third parties and ensuring on going compliance
- Ensuring the that adequate Personal Protective Equipment is available through selected business partners, providing
- Monitoring and reviewing the Company's safety related key performance indicators.

## 2.6 The HSEQ review Group

The HSEQ review Group is chaired by the Managing Director. The group's membership includes Company Directors and senior managers from all the main operational service areas.

The HSEQ Review Group will act as the main forum for planning, implementing, monitoring and reviewing arrangements to deliver the objectives of the health and safety policy, and is responsible for reviewing and updating the Company's health and safety policy.

The HSEQ review group meeting dates are published internally on the Company HSEQ Manager's calendar, any safety related issues highlighted during safety tours or inspections, or any incident or near miss reports are discussed during the meeting to ensure the Company's health and safety management system remains robust.

All employees are encouraged to highlight areas of concern, as is their duty highlighted in section 2.4 above. Any such issues are discussed during the review meetings and where necessary appropriate arrangements are decided upon at senior management level prior to necessary consultation.

## Part 3 – Arrangements for Health and Safety

The Company recognises the social and economic importance of protecting the health and safety of its employees and those others who may be affected by its operations and is committed to leading by example in promoting health and safety in the day to day working activities including work-related driving activities. Health and safety should never be compromised for any other objective.

### 3.1 Management of Health and Safety at work

**Key Regulations** The Management Of Health & Safety At Work Regulations 1999

The system used to manage Health & Safety within the company is centred on the company's ISO45001:2018 Health & Safety Manual.

This working document clearly identifies:

- The key risks and Hazards associated with the companies work activities
- The Procedures adopted by the company to control the risks
- The procedures for providing information to and consulting with employees
- The reporting of incidents and accidents, and the results of monitoring
- Incidents and accidents.

The procedures for monitoring and auditing of the company's performance in relation to Health & Safety as well as the results of such exercises.

The principal policy arrangements are identified in the following sections.

### 3.2 Safe Place of Work

It is both the companies and the employee's responsibility to ensure that a safe place of work exists at all times and as such the following rules shall apply at all times:

- All plant and tools must at all times be kept in a safe and tidy manner.
- All waste and rubbish must be cleared away from all working areas, walkways and Fire Exits.
- Waste and rubbish must be properly stored and contained.
- Anything provided in the interests of health and safety must be properly used and maintained.
- All employees shall co-operate with the Company in the pursuit of health and safety compliance



### 3.3 Risk assessment

The company has in place a suite of generic risk assessments for various tasks and specific hazards, these risk assessments are provided to all employees during their induction process and forms part of their occupational specific handbooks.

The company also has a policy in place that all generic risk assessments are supplemented where applicable by a task specific point of work risk assessment which takes account of dynamic risks

The content of risk assessments is relayed to all applicable members of staff.

There is a policy and procedure in place to review all risk assessments at least annually or when there is a change in circumstances which necessitate a change due to changing working practices, legislative changes or new equipment.

All risk assessments are necessarily reviewed during investigations in to incidents and, or near miss events, to ensure the correct control measures are in place to mitigate further risk exposure.

### 3.4 Method Statements

Whilst not a legal requirement, for non-repetitive work activities method statements shall be produced prior to the work activity-taking place and issued formally to the persons employed in that work activity.

Method statements will be produced with due regard to information provided by the persons undertaking the work activity.

It is the employee's responsibility to work in accordance with the method statement once issued

### 3.5 Safe Systems of Work

Having identified the risks the company shall, in consultation with it employees develop and operate safe systems of work.

All planned and reactive procedures and processes will be performed without prejudice to the health and safety of those undertaking the operations involved.

There will be a regular review of written systems of work.

All persons using new machinery will be fully instructed in any hazards prior to its use.

No person will operate any type of plant, or machinery, unless for they have completed basic machine familiarisation training and that training has been signed off by both the supervisor and the individual. All such records are maintained in the personnel file of the individuals and updated on to the depot competence matrix.

## 3.6 Personal Protective Equipment

**Key Regulations:** Personal Protective Equipment At Work Regulations 1992

The Company has a separate specific Provision of PPE policy in place which details the minimum PPE requirements for those attending to customer site locations.

Further PPE is provided if as a result of a risk assessment personal protective equipment is identified as a control measure.

All employees must ensure that they use PPE as they are trained to use it.

No person should misuse PPE, it is an offence to interfere with or misuse anything provided in the interests of safety.

The Depot Manager is responsible for ensuring that employees receive the required personal protective equipment and that employees are given instruction and training in its use.

## 3.7 Work Equipment

**Key Regulations:** The Provision And Use Of Work Equipment Regulations 1998  
The Supply Of Machinery (Safety) Regulations 1992

The company has a separately produced policy on Work Equipment which is provided at each depot location.

The Company shall ensure that all Work Equipment whether purchased new or second hand, hired or leased shall be suitable for the intended purpose.

All new plant items for the hire fleet undergo a PUWER inspection by the senior management team prior to being incorporated into the Company's fleet.

Risk assessments will be carried out on all work equipment to identify the hazards they exhibit during use and identify control measures required.

The employees shall ensure that all work equipment is operated in accordance with operating procedures provided by the company produced following the risk assessment.

The company shall ensure that all work equipment shall be maintained in good working order

by the provision of a planned maintenance system as detailed in the Company ISO9001:2018 Quality Management system.

Records of maintenance checks and inspections of safety devices shall be kept.

The company shall ensure that all employees are provided with sufficient information and training for the safe use of the work equipment supplied, particularly where the work equipment exhibits unusual or exceptional hazards or require special training (e.g. abrasive wheels).

Each location Manager in conjunction with the HSEQ Manager shall be responsible for ensuring workers are provided with information and training.

The employees shall ensure that any precautions, fencing and guards must be in place when the item is in use or in motion.

The employees shall ensure that any personal protective equipment that provided by the company to ensure a safe working system is in place must be used when the item is in use or in motion.

## 3.8 Lifting Equipment

**Key Regulations:** The Lifting Operations And Lifting Equipment Regulations 1998

The company shall ensure that all Lifting Equipment whether purchased new or second hand, hired or leased shall be of adequate strength and stability and suitable for the intended use.

The Company shall ensure that all Lifting Equipment is thoroughly inspected for defects prior to being put into use for the first time or where obtained from a third party documentary evidence of the same shall be obtained.

The Company shall ensure that all Lifting Equipment shall be clearly marked with the safe working load.

The Company shall employ the services of a third party organisation to undertake all thorough examinations required under the regulations. All examinations shall be conducted under a written schedule.

Where required the company shall ensure that for lifting equipment for lifting people a thorough examination shall be undertaken every six months.

Where required the company shall ensure that for all other lifting a thorough examination shall be undertaken every twelve months, and all lifting accessories are thoroughly examined every six months.

The Company has in place procedures in the ISO9001:2018 Manual to ensure that all items of the hire fleet are thoroughly examined prior to being hired out, and customers are provided

with a copy of the current thorough examination record.

The Company shall ensure that all Lifting Equipment shall be maintained in good working order by the provision of a planned maintenance system.

The company shall ensure that a "Competent Person" shall properly plan all Lifting Operations.

## 3.9 Manual Handling

**Key Regulations:** The Manual Handling Operations Regulations 1992 (Amended 2002)

Due to the companies work activities the Directors have identified manual handling as a key constituent to providing a safe working environment.

To this end the company will undertake manual handling risk assessments and provide the results to their employees.

The company shall wherever practicable remove the requirement for manual handling in its work activities and where this is not practicable mechanical methods of movement will be employed.

The company shall provide manual handling training to all employees.

The employees will ensure that they work in accordance with the control measures identified in the risk assessments and the training provided.

## 3.10 Noise

**Key Regulations:** The Control Of Noise At Work Regulations 2005

Noise Monitoring is undertaken by the HSEQ Manager during depot safety inspections

All work activities which are noisy in themselves or which take place in a noisy environment will be the subject of a noise risk assessment.

Control measures will be put in place to reduce the exposure of the employees to the levels identified within the regulations.

Employees will be advised of the findings and where hearing protection is required it will be suitable for purpose and the employee will be trained in its correct use.

## 3.11 Hazardous Substances

**Key Regulations:** The Control of Substances Hazardous To Health Regulations 2002

The company will assess the risks to health from all hazardous substances used in or created by the workplace activities before use or exposure.

The company shall wherever practicable prevent their employees from being exposed to all hazardous substances by way of elimination, or substitution.

Where preventing exposure is not reasonably practicable, then the company will adequately control it to meet or improve on prescribed workplace exposure limits (WEL's).

The company shall ensure that control measures are communicated to employees by means of information and training, and ensure that control measures identified are used and maintained properly and that safety procedures are followed.

The company will, where applicable, carry out appropriate health surveillance/fitness for work medicals as required and identified by risk assessment.

## 3.11 Vibration

**Key Regulations:** The Control of Vibration At Work Regulations 2005

Work activities which produce vibration will be the subject of a risk assessment.

Control measures will be put in place to reduce the exposure of the employees to the levels identified within the regulations.

Employees will be advised of the findings and where control measures are required it will be suitable for purpose and the employee will be trained accordingly.

## 3.11 Emergencies (including Fire)

**Key Regulations:** The Regulatory Reform (Fire Safety) Order 2005

The company has in place a separate Fire Safety Management Policy document in which it commits to undertake a full and detailed risk assessment of the premises as required by the above order.

The Managing Director shall ensure that relevant duty holder(s) are appointed.

Each company depot location has an up to date fire risk assessment in place as well as a

location specific emergency evacuation plan and procedure and provides written procedures for evacuation in the event of an emergency which will be communicated to employees and visitors at induction.

The company shall also provide such information and training to employees and duty holders as identified in the fire risk assessment.

We ensure that there are sufficient numbers of fire Wardens at each location to manage the safe evacuation of all staff and visitors during an emergency evacuation.

All personnel will familiarise themselves with the fire precautions, fire alarms, means of escape and any emergency evacuation procedures that exist which will be displayed in a prominent position around the workplace.

Before leaving the premises personnel shall make sure that all naked flames or ignition sources are extinguished and where practical all electrical apparatus are turned off.

All fire exits, doors and firefighting equipment is routinely checked and recorded in the locations fire safety log book. All emergency evacuation routes are maintained clear of obstructions at all times and routine fire evacuation drill are conducted in line with the fire safety management policy and procedure.

## 3.12 Working at Height

**Key Regulations:** The Work at Height Regulations 2005 (Amended 2007)

The company has identified that working at height is a high-risk work activity and as such will reduce the need to work at height to a minimum.

Where working at height is unavoidable the company shall ensure that risk assessments are undertaken which will clearly identify the control measures required for that work activity.

The employees will ensure that they work in accordance with the control measures identified in the risk assessments.

## 3.13 First Aid & Welfare

**Key Regulations:** The Health & Safety (First Aid) Regulations 1981  
The Workplace (Health, Safety And Welfare) Regulations 1992

The company has undertaken a risk assessment to identify the type and quantity of First Aid Equipment that is required as a result of the work activity and undertakes to provide:

- First aid facilities that are sufficient to cater for the number of employees and the work

activity in accordance with published guidance

- Sufficient welfare facilities including adequate lighting, temperature, ventilation, changing and washing provisions.
- And ensure that all employees will be made aware of any such arrangements.

The Managing Director shall be responsible for ensuring that adequate welfare provision is made.

The Managing Director shall also be responsible for ensuring that duty holders are appointed for first aid and that they are given suitable and sufficient information, training and resources to carry out their duties.

### 3.14 Accidents, Incidents and Dangerous occurrences

**Key Regulations:** Reporting of Injuries, Diseases And Dangerous Occurrence Regulations 2013

It is the responsibility of the company to report certain accidents, incidents or dangerous occurrences to the Health & Safety Executive.

All accidents, whether there is injury or not, are to be reported to the supervisor as soon as possible using the companies reporting procedure and entered in the accident book.

Any notifiable accident or dangerous occurrence is to be reported by the Company HSEQ Manager to the Health & Safety Executive on the prescribed form within fifteen days not counting day of accident.

For example, under the Reporting of Injuries, Diseases and Dangerous Occurrence Regulations 2013, the following Injuries should be reported:

- Death of a person as a result of a work related accident
- Over seven day injuries
- Fractures, other than to fingers, thumbs and toes
- Amputation of an arm, hand, finger, thumb, leg, foot or toe
- Any injury likely to lead to permanent loss of sight or reduction in sight in one or both eyes
- Any crush injury to the head or torso, causing damage to the brain or internal organs
- Any burn injury (including scalding) which:
  - covers more than 10% of the whole body's total surface area or
  - causes significant damage to the eyes, respiratory system or other vital organs
- Any degree of scalping requiring hospital treatment
- Any loss of consciousness caused by head injury or asphyxia
- Any other injury arising from working in an enclosed space which:
  - leads to hypothermia or heat-induced illness or
  - requires resuscitation or admittance to hospital for more than 24 hours

The following incidents or dangerous occurrences should for example be reported:

- The collapse, overturning or failure of any load-bearing part of any lifting equipment, other than an accessory for lifting.
- Any plant or equipment unintentionally coming into:
  - contact with an uninsulated overhead electric line in which the voltage exceeds 200 volts; or
  - Close proximity with such an electric line, such that it causes an electrical discharge.

## 3.15 Provision of information

**Key Regulations:** The Health & Safety (Information For Employees) Regulations 2009

Information is provided to the company's employees by the provision of an on-going training programme operated by the company.

Upon joining the company each employee participates in a formal induction course, which covers the following key elements.

An introduction to the company and the companies work activities.

- The Health & Safety at work Act 1974
- The company's Health & Safety Policy
- The reporting of incidents and accidents
- The areas of risk associated with the companies work activities
- Risk Assessments undertaken by the company
- Control measures used to reduce the exposure to the risks including:
  - Safe Systems of work
  - Method Statements
  - Personal Protection Equipment
  - COSHH Data

Other specific information required by virtue of the employees specific work activity

- Lone working arrangements
- Construction site rules
- Young Persons
- Expectant and New Mothers



## 3.16 Training

All employees are given training appropriate to their responsibilities in accordance with the Management of Health and Safety at Work Regulations 1999

The Company provides health and safety induction training to all employees at the commencement of their employment relevant to their specific role.

The company's current training programme includes:

- Work at height training
- Machine familiarisation training
- Fork lift truck operator training
- Overhead pendant controlled crane operator training
- Abrasive wheels training including the correct storage, inspection, selection, fitting and use
- FORS Safety e-learning
- 16 life saver rules induction training
- Manual handling training
- Construction plant maintenance apprenticeship training
- Driver loading and securing of construction plant equipment
- Safe access and egress from roadworks on high speed dual carriage ways
- Conducting point of work risk assessments
- Use and storage of chemicals for the cleaning of construction plant equipment
- Emergency evacuation
- First aid at work
- Fire warden training

We provide all necessary personal protective equipment and ensure there are arrangements in place to ensure the safety of those working remotely.

Any training provided by the company will be formally recorded with a hard copy kept on file.

A programme of refresher training will be undertaken to keep employees up to date with legislation and industry best practice.

## 3.17 Consultation

**Key Regulations:** The Health And Safety (Consultation With Employees) Regulations 1996

In order to meet the legal requirements of the Health and Safety (Consultation with Employees) Regulations, the Company routinely consults with employees through a number of different forums. Consultation is regularly conducted through:

- In formal conversations between employees and managers of the company

- Employee input to the HSEQ Review Group meetings
- Formal review processes of new and reviewed risk assessments and the necessary risk mitigation controls
- Employee feedback provided on new policy statements
- Employee notifications of matters concerning health and safety arrangements

## 3.18 Performance and monitoring and reviewing of the Health and safety policy

### 3.18.1 Performance standards

The HSEQ Review Group will agree appropriate performance standards against which the Company will measure the effectiveness of its health and safety management system.

Current performance standards cover:

- Safety policies and associated policy statements
- Health and safety information and training given to staff, visitors and contractors
- Risk assessments
- Stress management and well-being
- Accident statistics
- Accident Frequency Rate
- Accident Incident Rates
- The number or near miss reports

### 3.18.2 Monitoring and Reviewing the Health and Safety Policy and related procedures

The Health and Safety Policy will be reviewed annually by the HSEQ Manager in conjunction with the HSEQ Review Group. It will be amended as appropriate and will be supplemented by further statements, policies or procedures as necessary.

The HSEQ Manager will make arrangements for an annual audit of all depots or departments to assess compliance with the Company's health and safety policies and procedures, and the findings of the audit will be reported to Managing Director and the HSEQ Review Group, with any recommendations for improvements.

## 3.19 Communication

This Health and Safety Policy is communicated to all employees, contractors and visitors. A copy is displayed on HSEQ notice boards at each office location and provided in employee handbooks.

All employees are encouraged to read it and communicate any queries to the Company HSEQ Manager.