

**SECTION 1**

**HEALTH & SAFETY**

**POLICY**

# **HEALTH & SAFETY POLICY STATEMENT**

## **1 GENERAL STATEMENT**

The Health and Safety of all our employees, contractors, self-employed associates, visitors, customers, tenants and members of the public who are, or who may be affected by our operations is of paramount importance to us.

Senior Management has reviewed Health, Safety, and Environmental Legislation when considering our responsibilities and setting our Health and Safety Policy objectives.

## **2 COMPANY RESPONSIBILITIES**

We will ensure, so far as is reasonably practicable, the health, safety and welfare at work of all employees. We will manage our business in such a way, and so far as is reasonably practicable, that the safety and welfare of persons not employed by us are not exposed to risks.

This policy document explains in broad terms what must be done by everyone within SPM Print Limited to achieve these objectives. The aim is to provide a sound basis for co-operation between management and employees and is intended to encourage continuous improvement of our Health, Safety and Environmental performance.

## **3 OBJECTIVES AND COMMITMENT**

### **3.1 Our objectives are to:**

- \* Risk reduction, prevention of injury and loss due to damage.
- \* Identify health and safety hazards and manage those hazards so that the risks are effectively controlled.
- \* Work to safety standards which satisfy our statutory requirements and reflect good industry working practices.
- \* Review and develop these standards continuously. Revise them accordingly when changes in legislation, industry practice or technology occur.

### **3.2 We are committed to consult with employees on health, safety and welfare issues by:**

- \* Ensuring that our employees are trained to understand and carry out their responsibilities. This will involve, but will not be limited to, selection, training, re-training and continuous assessment of employee performance.
- \* Continually monitoring this policy by auditing and reviewing its effectiveness in the workplace.

#### **4 LEGAL OBLIGATIONS**

We recognise the legal obligations placed on us by the Health & Safety at Work etc. Act 1974 and other Statutory Legislation as may be applicable to our undertaking.

Our Health and Safety documentation and records will be made freely accessible to employees, contractors, self-employed associates, visitors, customers, tenants and members of the public who may be affected by our operations.

Employees will be made aware of this facility and are obliged to familiarise themselves with the contents of this Manual as it contains essential information for their health, safety and welfare. Should any employee have any questions on any health and safety related matter they must raise it with their immediate supervisor.

#### **5 HEALTH & SAFETY ADVISORY SERVICE**

In order to assist us in our undertaking we have appointed **NatWest Mentor Services** Health & Safety Service to provide competent advice and guidance, to which we will duly adhere.

Name: Mr. Phil Yardley

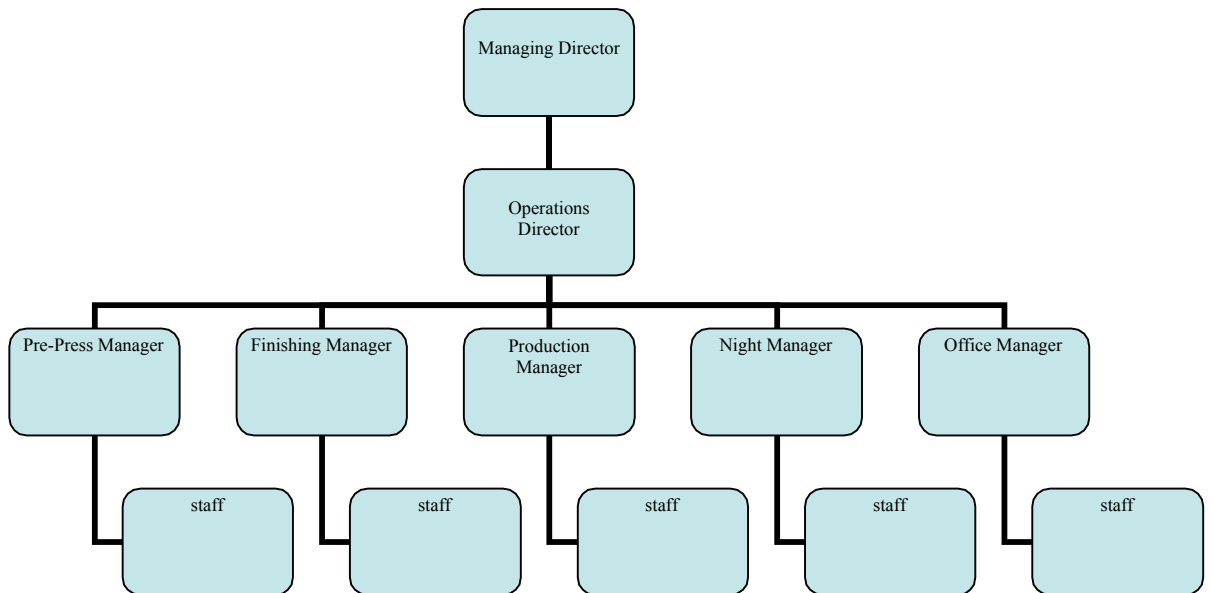
Position: Managing Director

# **SECTION 2**

# **HEALTH & SAFETY RESPONSIBILITIES**

# SPM PRINT LIMITED

## HEALTH & SAFETY ORGANISATION STRUCTURE



# HEALTH & SAFETY RESPONSIBILITIES

## 1 GENERAL

- 1.1 There are various levels of responsibility for persons employed within this organisation. These are defined by Health and Safety Legislation

The following responsibilities have been allocated to employees within our organisational structure.

- 1.2 Management will retain the overall responsibility to ensure that employees fully understand and comply with their duties under health and safety legislation. The main responsibilities contained within the Health and Safety at Work etc Act 1974 (HSWA 1974) are stated below.

- 1.3 The Director has the primary responsibility to ensure the Health and Safety of all our employees whilst they are at work.

- 1.4 We accept this principle and will manage our activities accordingly.

- 1.5 Section 2(3) of the (HSWA 1974) places a legal duty on us to ***“have in place a written statement of general policy”***.

This document states the arrangements that we have in place to ensure the Health and Safety at Work of all our employees, as well as others who may be affected by our activities.

- 1.6 It is the responsibility of the Director to ensure that this Policy is regularly reviewed and updated whenever changes occur in our operations and/or activities. Notwithstanding, the Policy shall be reviewed at least annually.

- 1.7 Our employees will be made aware of this policy document when they first join the organisation. Changes and/or amendments to supporting Health and Safety information will also be brought to their attention.

## **2 SPECIFIC RESPONSIBILITIES**

- 2.1 Section 2(2)a of the HSWA 1974 requires that we have ***“plant and systems of work that are, so far as is reasonably practicable, safe and without risks to health”***.

The Director has the responsibility to ensure that tools, equipment, plant and systems of work are safe, and that individuals required to use or operate the equipment, systems of work etc. are suitably trained and competent to do so.

Elements of this function are further delegated to the Managers.

- 2.2 Section 2(2)b requires that we have ***“arrangements for ensuring, so far as is reasonably practicable, absence of risks to health in connection with the use, handling, storage and transport of articles and substances”***.

The Director has the responsibility to ensure that those employees who are required to use, handle, store or transport, articles and/or substances in connection with their daily employment have been properly trained in these activities.

Elements of this function are further delegated to the Managers.

- 2.3 Section 2(2)c requires that we provide ***“such information, instruction, training and supervision as is necessary to ensure, so far as is reasonably practicable, the health and safety at work of his employees”***.

The Director has the responsibility to ensure that employees carry out their work in the correct and most appropriate way as is detailed in any safe systems of work developed for that purpose.

Where appropriate, this responsibility will include the issue of personal protective equipment (PPE). We supply PPE to aid employee safety and insist that such items be worn when necessary.

Elements of this function are further delegated to the Managers.

- 2.4 The management responsibility for co-ordinating our training activities has been allocated to the Director who will organise training as and when required.

- 2.5 Section 6 of the Health and Safety at Work etc Act 1974 covering ‘duties of Designers, Suppliers, Installers’ is not considered to be applicable to our organisation.

### **3 MANAGEMENT OF HEALTH & SAFETY AT WORK REGULATIONS 1999**

- 3.1 We have a duty to make a suitable and sufficient assessment of risks to the health and safety at work of our employees under Regulation 3(1) of the above.

The significant findings from risk assessments will be recorded in writing and our employees notified of those findings.

- 3.2 Our management is responsible for taking appropriate action to reduce any significant risks to health and safety identified by risk assessments. Risks shall be reduced by elimination where reasonably practicable.

Where this is not reasonably practicable, suitable risk reduction measures shall be implemented. These measures include suitable design; guarding; safe systems of work; the use of personal protective equipment; information, instruction and training etc.

- 3.3 It is responsibility of the Director to ensure that risk assessments are conducted.

Some of these duties have been further delegated to the Managers.

- 3.4 Regulation 6 requires the provision of appropriate health surveillance as necessary.

- 3.5 Regulation 8 requires that we establish effective procedures to follow in the event of serious and/or imminent danger to persons working in our undertaking and others who may be affected by any such event/emergency.

- 3.6 The Fire Precautions (Workplace) Regulations 1997, requires that we undertake a “fire risk assessment” of the workplace and work activities. The responsibility for this function has been allocated to the Director, although elements of this may be further delegated as and when required.

- 3.7 The Office Manager has been allocated the responsibility to ensure that accident and/or injury records are regularly reviewed and statistics updated. Where applicable, any adverse trends are to be brought to the attention of the respective members of Management.

It is the responsibility of the Office Manager to report certain injuries, diseases and dangerous occurrences to the relevant authority. Reportable ‘incidents’ are detailed in the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR ‘95).

- 3.8 Young Persons – We will not employ any young person under 18 without first reviewing relevant risk assessments. This will determine the particular risks that may affect them in the light of their relative immaturity, lack of experience and unfamiliarity with the workplace. We will take account of the fitting and layout of the workplace relating to the machines, plant and equipment in use. In addition, we will consider the amount of training they need to receive before the commencement of their employment with us.

The responsibility to undertake risk assessments in relation to young persons has been allocated to the Director/Manager.

- 3.9 New or Expectant Mothers - A general risk assessment will be carried out for new or expectant mothers. Such an assessment will take account of the type of work in which they are involved and their working environment. Consideration will be given to hazards such as noise, cold, heat, chemicals, biological agents, etc.

The responsibility to undertake risk assessments in relation to the health and safety of new and expectant mothers has been allocated to the Director/Manager.

#### **4 EMPLOYEES RESPONSIBILITIES**

Employees have several duties under health and safety legislation as detailed below.

The Head of Safety has the responsibility to ensure that our employees are informed of these duties and, under section 2(2)c of the Health and Safety at Work etc Act 1974, to provide them with sufficient information, instruction, training and supervision to ensure their safety.

##### **4.1 HEALTH AND SAFETY AT WORK ETC. ACT 1974**

###### ***Section 7***

“To take reasonable care for the health and safety of himself and of other persons who may be affected by his acts or omissions at work”.

“As regards any duty or requirement imposed on his employer or any other person by or under any of the relevant statutory provisions, to co-operate with him so far as is necessary to enable that duty or requirement to be performed or complied with”.

###### ***Section 8***

“Not to intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety or welfare in pursuance of any of the relevant statutory provisions”.

##### **4.2 MANAGEMENT OF HEALTH & SAFETY AT WORK REGULATIONS 1999**

###### ***Regulation 14***

Employees have a duty;

“To use everything provided for his use, and/or his health & safety, in accordance with any training or instructions received.”

“To inform his employer, or another employee (e.g. their supervisor), of anything which he reasonably believes to represent a serious and immediate danger to health and safety.”

“To inform his employer, or another employee (e.g. their supervisor), of anything which he reasonably believes to be a shortcoming in respect of the protection arrangements for health and safety.”

#### **4.3 PERSONAL PROTECTIVE EQUIPMENT AT WORK REGULATIONS 1992**

##### ***Regulation 10(2)***

Employees shall use the personal protective equipment provided to them in accordance with the training and/or instruction that is provided.

##### ***Regulation 10(4)***

Every employee who is provided with personal protective equipment shall take reasonable care of it and return it to the appropriate accommodation provided when finished with.

##### ***Regulation 11***

Every employee provided with personal protective equipment shall report to his employer/senior any loss or obvious defect in that equipment.

#### **4.4 MANUAL HANDLING OPERATIONS REGULATIONS 1992**

##### ***Regulation 5***

Each employee whilst at work shall make full and proper use of any safe system of work provided for his/her use in compliance with these regulations.

#### **4.5 SOCIAL SECURITY (CLAIMS AND PAYMENTS) REGULATIONS 1979**

Any person incurring an injury or ill-health effect whilst at work no matter how small must ensure that an appropriate and accurate record is made in the accident/incident report book (BI 510 or similar).

#### **4.6 CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH REGULATIONS 2002**

##### ***Regulation 8(2)***

Every employee shall make full and proper use of any control measure, personal protective equipment or other facility provided for his use in compliance with these Regulations.

Every employee shall take all reasonable steps to ensure any control measure, personal protective equipment or other facility provided for his use is returned after use to any accommodation provided for it. If he discovers any defect he shall report it without delay to his employer

Every employee shall report forthwith to his employer (or any other employee with specific responsibility for the health and safety of his fellow employees) any accident or incident which has or may have resulted in the release of a biological agent which could cause severe human disease.

#### **4.7 WORK AT HEIGHT REGULATIONS 2005**

##### ***Regulation 14***

Every person [including every employee] shall, where working under the control of another person, report to that person any activity or defect relating to work at height which he knows is likely to endanger the safety of himself or another person.

**EVERY PERSON SHALL USE ANY WORK EQUIPMENT OR SAFETY DEVICE PROVIDED TO HIM FOR WORK AT HEIGHT BY**

**HIS EMPLOYER OR BY A PERSON UNDER WHOSE CONTROL HE WORKS, IN ACCORDANCE WITH - ANY TRAINING IN THE USE OF THE WORK EQUIPMENT OR DEVICE CONCERNED WHICH HAVE BEEN RECEIVED BY HIM AND THE INSTRUCTIONS THAT HAVE BEEN GIVEN RESPECTING ITS USE**

## **5. HEALTH AND SAFETY POLICY ARRANGEMENTS OUTLINE:**

### **5.1 REQUIREMENT FOR HEALTH AND SAFETY POLICY**

Section 2(3) of the Health and Safety at Work etc Act 1974 requires us to produce a written policy with respect to the health and safety of persons connected with our operations. This includes the arrangements currently in place for carrying out that policy.

This Policy document will be updated and amended as and when changes in Legislation and/or in our working practices demand.

### **5.2 HEALTH SURVEILLANCE**

There are currently no operations or processes within this organisation that require health surveillance to be undertaken as a matter of course.

Should this situation change, appropriate measures will be introduced by management.

### **5.3 INFORMATION, INSTRUCTION AND TRAINING**

It is the practice of this organisation to give as much information, instruction and training as possible to our employees in order to ensure that they are properly equipped to carry out their tasks in a safe and proper manner.

Our employees will receive instruction in the safety aspects of situations that they may encounter in their daily work. They will be advised of the actions that they are expected to take should they encounter a health and safety hazard or risk to themselves and/or anyone else.

### **5.3.1 INDUCTION TRAINING**

The Health and Safety Policy and associated documentation form the initial part of our induction training for employees.

All new employees will receive training on our Health and Safety Policy within their first few hours with us.

Employee induction training will cover the operational and welfare arrangements of the tasks that employees are expected to carry out with particular emphasis on health and safety practices.

All aspects of our fire arrangements will be explained including the fire procedure and relevant fire precautions. Specific fire arrangements relevant to the employees' place of work will be covered.

Training and instruction will be given in the operation and use of fire extinguishers and any other fire fighting equipment that is available. This training will include the means of raising the alarm in addition to the procedures that they will be expected to adopt in order to evacuate their workplace to a suitable place of safety.

### **5.3.2 REFRESHER TRAINING**

All of our employees will undergo periodic refresher training in the content and the requirements of our Health and Safety Policy and supporting arrangements.

### **5.3.3 SUPERVISION**

It is our practice to supervise our employees adequately and to take whatever action is required to ensure compliance with the requirements of relevant Legislation, Approved Codes of Practice and Guidance.

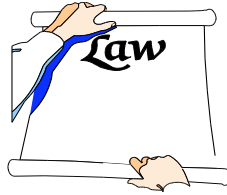
### **5.3.4 EMPLOYEE NOTIFICATION AND CONSULTATION**

Our employees will be made aware of any amendments to our Health and Safety Policy and/or associated documentation.

Acknowledgement will be required from all employees to identify that they have been made aware of changes.

We will inform our employees of any matters affecting their health, safety and/or welfare. Such information will be passed on by direct communication and/or through their workplace representatives as appropriate.

Should an employee wish to raise an item for discussion at our Health and Safety Committee meeting, they must ensure that the Committee Chairperson is notified well in advance as to the nature of the topic. This should ensure that appropriate resources and/or expertise are made available.



## **6 ENFORCEMENT NOTICES, PENALTIES AND INTERNAL DISCIPLINARY PROCEDURES**

### **6.1 ISSUE OF ENFORCEMENT NOTICE(S)**

Serving of Enforcement Notices by the authorities must be brought to the immediate attention of the Director who will then take appropriate action to comply with that notice.

### **6.2 LEGAL PENALTIES**

The Body Corporate accepts its responsibility, under section 37 of the Health and Safety at Work etc. Act 1974, in that it has a duty to take action should it become aware of **ANY** health and safety problems, even if it is not directly responsible for that particular work, area or process.

**ALL** members of management and employees are at risk of prosecution by the enforcing authorities for failing in their statutory health and safety responsibilities – these have been previously outlined.

Magistrate Courts (or Sheriff Courts in Scotland) may impose fines on summary conviction of up to £20,000 for breaches of the ‘General Duties’ being sections 2 to 6 of the Health and Safety at Work etc. Act 1974, and £5,000 for breaches under any of the other statutory provisions.

Offences tried on indictment (Solemn Procedure in Scotland) in the Crown Court (or Sheriff Court in Scotland) may attract unlimited fines.

Contravention of an Improvement notice or Prohibition Notice, or of a remedy order made by the court, may lead on summary conviction to a maximum £20,000 fine and/or 6 months imprisonment. On indictment, the maximum penalty is two years imprisonment and/or an unlimited fine.

### **6.3 POTENTIAL OUTCOMES**

The consequences from a breakdown in our safety management may result in the injury and possible death of employees, contractors, self-employed associates, visitors, customers, tenants and members of the public.

This may involve us and our employees in criminal and civil litigation, adverse publicity, increased insurance costs and/or other associated losses arising from the situation. These require due consideration when considering the various aims and objectives of our Policy.

### **6.4 DISCIPLINARY PROCEDURES**

It is our policy to discipline those who do not fulfil their health and safety responsibilities adequately. All employees will be given comprehensible information, instruction and training to ensure that they are fully aware of their duties.

We will not hesitate to instigate disciplinary procedures against any employee at any level who fail in their responsibilities in respect of health and safety.

This will occur even if they have been injured as a result of an accident caused by their own carelessness.