

Health and Safety Policy Manual

Authorised by:

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1 - Safety Policy Statement

It is the policy of Hackle Security Services Ltd, hereafter referred to as '*The Company*' to ensure the health, safety and welfare of its employees, and that of other persons who could be affected by their undertaking. In accordance with the requirements of the Health and Safety at Work Act, the Management of Health and Safety at Work Regulations, and other applicable legislation, the company will undertake assessments of risks and instigate arrangements that, so far as is reasonably practicable, ensure;

- ✓ Places of work are maintained in a safe condition;
- ✓ Working environments are safe and without risk to health;
- ✓ Work equipment and systems of work are safe and without risk to health;
- ✓ Adequate welfare facilities are provided; and
- ✓ Information, instruction, training and supervision are provided to ensure the health and safety of its employees and that of persons who may be affected by their work activities.

The company places great importance on ensuring the health safety and welfare of its employees. Managers have a key role in maintaining these standards and should regard their Health and Safety responsibilities towards persons under their direction, with equal importance to that of maintaining customer service levels and profitability.

The effective implementation of this policy will require the co-operation of employees at all levels. All employees are reminded that they have specific legal responsibilities to:-

- ✓ Ensure the health and safety of themselves and of any other persons who may be affected by their acts or omissions at work;
- ✓ Use equipment in accordance with the instructions and training provided;
- ✓ Report any work situation, which is considered to pose a serious threat or danger;
- ✓ Co-operate with their employers to comply with any statutory requirement placed upon them;
- ✓ Report any matter where it is considered that the safety arrangements in force fail to reduce risk to an acceptable level.

The Managing Director is ultimately responsible for Health and Safety within the company. He will ensure adequate resources are available to achieve the aims of this policy and monitor its effectiveness. Managers/Line Managers and Supervisors are responsible for the implementation of the arrangements defined in this policy in relation to the areas and activities under their control. The Policy will be reviewed annually and updated as necessary to reflect any changes in the activities undertaken and legislative requirements.

Mark Mathurin
Managing Director

Date: March 2013

2 – Responsibilities for Health and Safety

The Managing Director

The Managing Director is responsible for;

- ✓ Ensuring a health and safety policy is maintained that meets the requirements of the Company Safety Policy,
- ✓ Ensuring resources are made available for the implementation of the policy in all areas of business activity,
- ✓ Monitoring adherence to the safety policy throughout the company;

Operations Manager

The Operations Manager is responsible for the implementation of the safety policy and procedures in relation to the areas and activities under his/her control, including;

- ✓ Ensuring that fire risk assessments are completed;
- ✓ Ensuring emergency arrangements are maintained and practised as appropriate;
- ✓ Reviewing accident investigation/incident reports and reporting accidents via the correct channels;
- ✓ Monitoring the progress of risk assessment programmes during monthly business review meetings;
- ✓ Ensuring that employees are competent and adequately trained to discharge their defined safety responsibilities;
- ✓ Ensuring employees under their control discharge their defined safety responsibilities;
- ✓ Ensuring that they, and all employees under their direction, adhere to the safety policy and procedures;
- ✓ Monitoring the implementation of the policy at their location/place of work by undertaking annual safety reviews;
- ✓ Reporting to the Managing Director, any areas where the effectiveness of the safety policy and procedures could be improved.

Contract Managers

Contract Managers are responsible for the implementation of the safety policy and procedures in relation to the areas and activities under their control, i.e.;

- ✓ Carrying out pre contract site health, safety and welfare assessments;
- ✓ Ensuring risk assessments, welfare arrangements and emergency procedures are defined in assignment instructions;
- ✓ Ensuring employees are provided with information, training and supervision as necessary to work safely;
- ✓ Undertaking site inspections to ensure assignment instructions are being adhered to;
- ✓ Consulting with Security Officers on safety matters;
- ✓ Undertaking accident investigations of all incidents with the potential for serious injury;
- ✓ Meeting monthly with the client's site representative to resolve any safety issues;
- ✓ Ensuring that they and all employees under their direction adhere to the safety policy and procedures; and
- ✓ Reporting to the Operations Manager any areas where the effectiveness of the safety policy and procedures could be improved.

All Hackle Security Services Ltd Employees

All Hackle Security Services Ltd Employees are responsible for;

- ✓ Co-operating in health and safety inspections, risk assessments and accident investigations as required;
- ✓ Attending training courses as and when required;
- ✓ Following the laid down safety procedures;
- ✓ Undertaking their work in a safe manner in accordance with instructions and training provided; and
- ✓ Reporting any unsafe occurrences by notifying their Contract/Line Manager as appropriate.

3 - Accidents

Summary Requirements

All accidents at work must be recorded in an approved accident book and investigated to identify the actions necessary to prevent a recurrence. Specified injuries, diseases and dangerous occurrences must be reported to the appropriate enforcing authority via Hackle Security Services Ltd.

Company Procedure

Recording Accidents

In the event of an accident at work all Hackle employees should seek assistance from a first aider/appointed person and record the accident in the accident book. Security Officers should comply with the client's arrangements for accident recording and investigation and follow company procedures so that the accident can also be recorded in the Hackle Accident Book. Completed accident reports should be removed from the Accident Book and filed confidentially.

Accident and Incident Investigation

Accidents and incident investigation reports should then be passed on to the appropriate Manager, who should record details of the investigation and the action necessary to prevent a recurrence. The form should then be sent to the Operations Manager/Head of Department who will sign off the form, if satisfied with the investigation, or will require further action to be taken. Managers should ensure they have received reports for all incidents entered in the accident book on a regular basis.

Accident Reporting

The Operations Manager and Heads of Department are responsible for reporting all notifiable (RIDDOR) incidents involving their employees to the Managing Director. This includes reportable accidents involving Hackle Security Officers on Clients premises. The accident investigation report and any witness statements or other documentation relating to the investigation should be sent to the Operations Manager (but not the accident book entry, this should remain confidential due to the personal details recorded). A record should be maintained of all reports made to the Operations Manager.

Fatal accidents and those resulting in major injuries must be reported immediately to Hackle Control Room and the Hackle Duty Manager.

- ✓ fracture, other than to the fingers, thumbs or toes, (includes a break, crack or chip).
- ✓ Any amputation (traumatic or surgical).
- ✓ Dislocation of the shoulder, hip, knee or spine.
- ✓ Loss of sight (temporary or permanent).
- ✓ A chemical or hot metal burn or penetrating injury to the eye.
- ✓ Any injury resulting from an electric shock or electrical burn leading to unconsciousness or requiring resuscitation.
- ✓ Acute illness requiring medical treatment after uptake of any substance as a result of inhalation, ingestion, or absorption
- ✓ Any other injury leading to hypothermia, heat induced illness or to unconsciousness, requiring resuscitation, or requiring admittance to hospital for more than 24 hours
- ✓ Work related diseases, dangerous occurrences and accidents resulting in employees being unable to carry out their normal work for more than 3 days.
- ✓ Managers should be advised immediately of any accident or incident that is likely to require reporting to the enforcing authority. In the absence of a Senior Manager the appropriate Line Manager is responsible for reporting.

Record Keeping Requirements

- All accidents involving Hackle employees and those occurring on Hackle premises should be recorded in the accident book and completed records should be removed from the accident book and filed confidentially.
- Copies of completed accident investigation reports should be kept in the relevant Site File.

4 - Asbestos

Summary Requirements

Employers are required to undertake surveys of their workplaces to determine if any asbestos containing materials are present. If asbestos containing materials are identified, the employer must undertake an assessment that takes account of the asbestos type, it's condition and likelihood of disturbance. Based on the findings of this assessment the employer should decide whether the asbestos should be removed or left in situ and managed to prevent fibre release.

Company Procedure

- Managers are responsible for ensuring Type 2 asbestos surveys are undertaken of all materials that are suspected to contain asbestos. Type 2 assessments include the analysis of any suspected asbestos containing materials to positively confirm whether the materials in question contain asbestos and if so what type.
- Managers are responsible for maintaining schedules of the type and location of presumed and confirmed asbestos containing materials (ACM) in the areas under their control. Any materials that cannot be positively identified as being asbestos free should be treated as asbestos.
- Managers are responsible for ensuring the risks from any potential and confirmed asbestos containing materials are assessed and appropriate risk control measures are implemented in accordance with the guidance in the following chart.

Action required to prevent exposure to asbestos containing materials (ACM's)							
		Where practical the material should be labelled.	Provide information to employees.	Provide information to persons likely to disturb ACM's.	Condition of ACM's should be monitored at regular intervals.	The material should be repaired and or encapsulated	Asbestos should be removed by an approved an licensed contractor
Condition of ACM	Good condition	✓	✓	✓	✓		
	Minor damage	✓	✓	✓	✓	✓	
	Poor condition or likely to be disturbed						✓

- Where suspected asbestos containing materials are identified that are in poor condition, or are likely to be disturbed, short-term risk control measures should be implemented to prevent exposure until the materials can be removed.
- Employees should not disturb asbestos containing materials. Any damage to known asbestos containing materials or discovery of materials that may contain asbestos should be reported to their Manager.

Record Keeping Requirements

1. Managers should ensure that asbestos surveys are kept in this section of the safety management file.
2. Managers should enter details of asbestos containing materials identified and the means of preventing the release of asbestos fibres in the asbestos register, assessment and management plan.

5 - Buildings, Services and Equipment

Summary Requirement

Workplaces and work equipment must be suitable for their intended use and be maintained in a safe condition. Work equipment should be operated by competent persons in accordance with the manufacturer's instructions. Maintenance should only be undertaken by competent persons.

Company Procedure

Managers and purchasing staff are responsible for ensuring that buildings and work equipment are suitable for their intended use. All new work equipment should be CE marked to confirm compliance with applicable product safety standards. Managers are responsible for ensuring that buildings, services and work equipment are maintained in a safe condition.

All work equipment should be used in accordance with the manufacturer's instructions. Hazardous work equipment should only be operated by suitably trained and authorised employees. Employees are responsible for undertaking pre-use checks of equipment prior to use. Any defects identified in the building, associated services or equipment, should be brought to the attention of the Operations Manager / Head of Department. Staff must not attempt to effect repairs to or use defective services or equipment.

Managers are responsible for ensuring that appropriately qualified persons are employed to remedy defects that are reported by employees. Managers are responsible for ensuring that equipment that is liable to fail in a dangerous manner is subject to a planned programme of inspection and test by a competent person. Managers should additionally check with their clients to establish who is responsible for the maintenance and testing of equipment and services listed below. Such equipment includes:

- lifts
- lifting equipment
- gas appliances
- electrical appliances
- electrical installations
- fire alarm systems
- fire extinguishers
- pressure vessels and systems
- air conditioning systems
- drinking water dispensers

Where such equipment is provided Contract Managers, should ensure that clients have suitable maintenance arrangements in place. Maintenance schedules and record sheets should be used to ensure maintenance is undertaken as required.

Record Keeping Requirements

- All services and equipment requiring planned maintenance should be identified in the maintenance schedule in a safety management file.
- All maintenance undertaken should be recorded in the maintenance record in the safety management file.
- The provision of information and / or training and authorisation to operate hazardous work equipment should be recorded in the training record in the safety management file.

6 - Consultation

Summary Requirement

Employers are required to consult with their employees regarding health and safety issues in the workplace either directly or via elected representatives.

Company Procedure

Managers are responsible for consulting with their employees on a day to day basis. On contract sites, health and safety issues can be raised directly with the Client or with the Contract Manager. The clients contact for health and safety should be specified in the assignment instructions.

If an employee is not satisfied with the response from their Manager or client representative on a health and safety matter they should raise it with their Contract/Line manager. If necessary, the Contract/Line manager will obtain further advice from the Company Health and Safety advisor.

Record Keeping Requirements

- Security Officers should record any safety concerns or recommendations for improvements in the Daily Occurrence Book (DOB)
- Contract Managers should initial and date the entry during the subsequent site visit to confirm that it has been acknowledged and is being dealt with.

7 - Contractors

Summary Requirement

Employers are responsible for ensuring the health and safety of their employees whilst at work - this includes protecting employees from the hazards associated with contractors activities. Employers are responsible for ensuring the safety of other persons who may be affected by their activities - this includes contractors, who should be informed of any hazards present on the premises before they start work.

Company Procedure

All Activities Carried Out By Contractors

Contract/Line managers are responsible for ensuring that all contractors engaged to undertake work at Hackle premises are competent, e.g. electricians are members of the NICEIC, gas maintenance contractors are members of CORGI and builders are members of a skills certification scheme.

Major Works

If one or more of the following criteria listed below apply to works to be undertaken by a contractor, the Construction, Design and Management Regulations may apply;

- A duration of more than 30 days;
- A duration in excess of 500 person days;
- Five or more people on site at any one time;
- Involves demolition.

In such cases Hackle Security Services Ltd have specific duties which have to be discharged, and Contract/Line managers should contact the Operations Manager for further advice.

Window Cleaning

All windows should be constructed or be provided with appropriate equipment to enable them to be cleaned in safety. Where access is by ladder a firm and level footing should be maintained. Where there is a risk of a window cleaner falling, suitable anchorage points for the attachment of safety harnesses should be provided. If a ladder exceeds 6 metres suitable points for tying it off should be provided. No ladder in excess of 9 metres should be used for window cleaning.

Record Keeping Requirements

- Completed contractor safety questionnaires and records confirming membership of approved bodies should be kept in the safety management file.

8 - Display Screen Equipment

Summary Requirement

Employers are responsible for ensuring that significant users of computers are provided with information regarding the correct use of display screen equipment and that assessments of their workstations are undertaken. Significant users are also entitled to eye tests paid for by the employer and corrective spectacles where the eye test identifies that a different prescription is required solely for computer use. Significant users of display screen equipment are those that use their computers continuously for an hour or more on a daily basis.

Company Procedure

Managers should identify all significant users and ensure they are provided with the HSE guidance 'Working with VDU's' and self assessment questionnaires. Significant users of computer equipment are responsible for reading the guidance, completing the assessment questionnaire and returning it to their Manager. The Manager should ensure questionnaires are returned by significant users and review the completed questionnaires and address any risks identified.

Employees required to use display screen equipment for significant periods are entitled to eye tests paid for by the company. The purpose of the eye test is to determine whether the employee can focus clearly on the display screen image, using their normal spectacles where necessary. If it is found that an employee's existing spectacles are not suitable for use with display screen equipment, the company will provide a suitable pair of basic spectacles. A user may choose more expensive spectacles provided they pay the difference.

Record Keeping Requirements

- The issue of the employee guides should be recorded using the information and training record in the safety management file.
- Completed display screen equipment self assessment questionnaires should be kept in the safety management file.

9 - Enforcement Officers

Summary Requirement

Environmental Health Officers are empowered to monitor and enforce safety legislation in offices, restaurants, distribution centres and retail premises. Health and Safety Executive Inspectors are responsible for monitoring and enforcing safety legislation in factories, laboratories, refineries, chemical works and health care establishments. Enforcement Officers have wide-ranging powers that are detailed in their warrants. Enforcement Officers must produce their warrants on request, without their warrants they have no powers of entry or enforcement. Enforcement Officers are legally empowered to:

- Enter and inspect premises with the assistance of police officers if required;
- Require that plant and equipment is not disturbed following an incident;
- Take measurements and photographs and samples of suspect substances;
- Require tests to be carried out on suspect plant or substances;
- Require the dismantling of plant;
- Require those with possible knowledge relevant to an investigation to give it either verbally or in a written statement;
- Inspect and take copies of books or documents required to be kept by safety legislation or others as necessary as part of an investigation; and
- Require assistance within a person's limits of responsibility.

Company Procedure

All persons should co-operate fully with Enforcement Officers and the most senior member of staff available should accompany them during their inspections. Copies of reports resulting from inspections should be sent to the Company Health and Safety Advisor. Additionally, *any* contact with enforcement agencies should be reported to the Company Health and Safety Advisor.

Record Keeping Requirements

- Reports issued by an Enforcement Officer should be kept in the safety management file.

10 - Fire

Summary Requirement

Employers are required to assess the fire risks in their premises to ensure that the risk of fire is minimised and that appropriate arrangements are provided for the safe evacuation of employees in the event of a fire occurring.

Company Procedure

Risk Assessment

Contract/Line managers are responsible for ensuring a fire risk assessment is carried out for all premises under their control.

Fire risk assessments should be undertaken to ensure the effectiveness of the fire safety arrangements. The fire risk assessment should define the arrangements and requirements for ensuring adequate provision of fire prevention and detection systems, fire fighting equipment, provision of training and information and the maintenance of installations and equipment provided for the purposes of detection and fire fighting. Particular consideration should also be given to issues such as hazardous or dangerous substances and young persons. The arrangements for fire safety on contract sites are reviewed by contract managers during the site risk assessment and specified in the assignment instructions.

The significant findings of the fire risk assessment, along with any specific fire training deemed necessary, should be provided to employees and the provision of such information and training recorded. Records should be signed by the employees to confirm they have received and understood the information and training provided.

Risk assessments should be reviewed prior to any significant changes to ensure such changes will not increase the risks to an unacceptable level. If there are no significant changes the risk assessment should still be reviewed annually to ensure it remains suitable and relevant and the control measures are still the most effective way to manage the risks.

Fire Authorities shall no longer issue or enforce Fire Certificates but will expect to see risk assessments when carrying out site visits.

Fire Evacuation Procedures

Formal fire evacuation procedures should be displayed in all premises occupied by Hackle employees. The procedures should detail the means of raising the alarm, the means of escape from the building and the designated fire assembly point(s).

On discovery of fire staff should raise the alarm and evacuate the danger area. From a position of safety the fire service should be called. Upon hearing the alarm, staff should turn off the equipment they are using and evacuate the building using the quickest available means.

During a fire evacuation no attempt should be made to use a lift. No persons should re-enter the building until told to do so by the Client or Head of Department.

The means of raising the alarm should be tested weekly using a different call point to initiate the alarm on each occasion. Fire alarm systems should be maintained on a quarterly basis. The effectiveness of the fire evacuation procedure should be practised during annual fire drills. Records of audibility tests, fire alarm maintenance and fire drills should be maintained.

Fire Extinguishers

Fire extinguishers provided should be appropriate for the type of risk.

- Water extinguishers (red) should be provided for normal fires, such as paper, wood, fabrics.
- Carbon Dioxide (Black) or Dry Powder (blue) extinguishers should be provided for electrical fires.
- Foam extinguishers (cream) or fire blankets should be provided for flammable liquid fires in kitchen areas.

Note: *All new fire extinguishers are red. The different types of extinguisher are identified by labelling and a small colour coded panel.*

Only persons who have received training in the use of fire extinguishers should attempt to extinguish a fire, and only then if it is safe to do so. All fire extinguishing equipment should be checked, and maintained by an approved contractor on an annual basis.

Record Keeping Requirements

- A copy of the fire risk assessment should be kept in the safety management file.
- Maintenance of fire equipment should be recorded in the maintenance record in the safety management file.
- Maintenance of fire systems, such as alarms, emergency lighting, call points, sprinklers, etc, should be recorded in the maintenance record in the safety management file.
- Fire alarm tests and fire drills should be recorded in the fire log in the safety management file.
- Information and training provided to employees should be recorded in the information and training record in the safety management file.

Note: *Existing fire certificates and all approved amendments to it should be archived.*

11 - First Aid

Summary Requirement

Employers are required to make adequate provision for first aid taking account of the risks associated with the undertaking, the number of employees and the proximity of emergency services.

Company Procedure

Provision for First Aid

First aid supplies should be provided and maintained in all workplaces occupied by Hackle employees. In offices where there are more than 50 employees first aiders should be trained and appointed. In offices where there are less than 50 employees, appointed persons should be designated to take charge in the event of a medical emergency and maintain first aid supplies.

Category of risk	Numbers employed at any location	Suggested number of first-aid Personnel
Lower risk eg shops and offices, libraries	Fewer than 50 50-100	At least one appointed person At least one first aider
Medium risk eg light engineering and assembly work, food processing, warehousing	Fewer than 20 20-100 More than 100	At least one appointed person At least one first aider for every 50 employed (or part thereof) One additional first aider for every 100 employed
Higher risk eg most construction, slaughterhouses, chemical manufacture, extensive work with dangerous machinery or sharp instruments	Fewer than 5 5-50 More than 50	At least one appointed person At least one first aider One additional first aider for every 50 employed

It is recommended that all appointed persons attend emergency aid training courses. Appointed persons must not provide first aid unless they have been trained to do so. Planned absence of appointed persons and first aiders should be co-ordinated to ensure adequate provision remains available. The names and contact details of first aiders or appointed persons should be displayed on notice boards.

The arrangements for the provision of first aid and supplies on contract sites are considered by Contract Managers during site risk assessment and requirements are specified in the assignment instructions.

Treatment Records

Records of all first aid treatment should be maintained and should include the name of the injured party, date, time and details of the incident, injury and treatment. These details should be recorded in Part 1 of the company's accident investigation report form – see earlier section regarding accidents.

Record Keeping Requirements

- The names and contact details for first aiders should be recorded and displayed on notice boards.
- First aider and appointed person training should be recorded in the information and training record in the safety management file.
- First aiders should record all treatment provided on the accident investigation report form – see earlier section regarding accidents.

12 - Hazardous Substances

Summary Requirement

Employers should avoid the need to use hazardous substances wherever possible. Where the use of hazardous substances cannot be avoided, employers are required to undertake assessments to ensure controls are provided that maintain employee exposure at safe levels.

Company Procedure

Managers are responsible for ensuring that all hazardous substances used by their employees or at locations under their control are identified and entered onto a register. Managers are also responsible for ensuring COSHH registers are maintained, safety data sheets are obtained from manufacturers / suppliers and local COSHH assessments are undertaken for all hazardous substances listed on the register.

The information contained on safety data sheets should be used when undertaking assessments of the exposure of employees when using substances identified on the COSHH register. Assistance when undertaking COSHH assessments is available via the Company Health and Safety Advisor. Managers are responsible for ensuring that the precautions deemed necessary by the COSHH assessment are brought to the attention of employees and are adhered to at all times.

Record Keeping Requirements

- All hazardous substances in use should be recorded in the COSHH register in the safety management file.
- Safety data sheets should be obtained for all substances identified on the COSHH register which should be kept in the safety management file.
- Copies of COSHH assessments should be kept in the safety management file.
- Information issued to employees regarding the safe use of hazardous substances should be recorded in the information and training record in the safety management file.

13 - Information

Summary Requirement

Employers must provide employees with information regarding the health and safety requirements and health and safety arrangements in force at work.

Company Procedure

The following information should be displayed at all Hackle premises:

- health and safety policy statement;
- employers liability insurance certificate;
- fire evacuation procedures; and
- first aid arrangements.

It is recommended that all employees are issued with handbooks that contain summary versions of the safety policy and significant findings of generic risk assessments applicable to their work. The assignment instructions at contract sites are to contain site specific assessments and contact details for the customer's representative for health and safety matters. The following information should also be provided at contract sites:

- site specific fire evacuation procedures;
- site specific first aid arrangements;
- site specific welfare arrangements;
- site specific accident investigation procedures; and
- health and safety law leaflet.

Record Keeping Requirements

- The issue of employee health and safety handbooks should be recorded in the information and training record in the safety management file.

14 - Manual Handling

Summary Requirement

Employers should avoid the manual handling of loads where possible. Where manual handling can not be avoided assessments of the task should be undertaken to ensure appropriate precautions have been taken to prevent injury.

Company Procedure

Managers are responsible for ensuring that, where possible, the need to manually handle heavy loads on a regular basis is avoided. Where it is not possible to avoid manual handling of heavy loads on a regular basis Managers are responsible for ensuring manual handling assessments are undertaken. Assistance in undertaking manual handling assessments is available via the Company Health and Safety Advisor.

Managers are responsible for ensuring that any precautions deemed necessary by the manual handling assessment are implemented, and persons required to manually handle heavy loads are provided with appropriate safety training.

Regardless of the weight, all manual handling activities have the potential to cause harm. The following procedure should be observed when lifting any load:

- Plan the lift before you start, how will you grip it, where have you got to take it, what route will you take, is the route free of obstructions, where and how will you put it down;
- Stand close to the load, place the feet apart with leading leg forward for balance;
- When lifting items from below waist height bend the legs, not the back;
- Get a firm grip, keep your arms inside the boundary formed by the legs;
- Evaluate the weight of the load and the centre of gravity;
- Only continue with the lift if you are sure that you can lift, carry and lower the load safely;
- Lift slowly using your leg muscles to stand and keep the load close to your body;
- Do not jerk or twist the body whilst lifting, carrying or lowering the load;
- Put the load down slowly, using your leg muscles if the load is to be lowered; and
- Adjust the load only after you have put it down.

Seek assistance if a load is too heavy or bulky to lift safely on your own - do not attempt to lift a load on your own if you feel it is not within your capability to do so safely.

Record Keeping Requirements

- Completed manual handling assessments should be kept in the safety management file.
- Manual handling training provided to employees should be recorded in the information and training record in the safety management file.

15 - Monitoring

Summary Requirement

Employers are required to monitor the effectiveness of their protective and preventative measures for the management of health and safety.

Company Procedure

All Managers, Heads of Department and Line Managers are responsible for implementing the requirements of the policy and monitoring adherence to systems of work and assignment instructions, in respect of the areas and activities under their control. Each year, Contract Managers / Line Managers should undertake internal audits of the implementation of the defined safety arrangements at all regional centres and offices, using a checklist to record the findings. The checklist is sent to and reviewed by the Company Health and Safety Advisor on an annual basis. Senior Managers should complete a Senior Managers Safety Observation Report form when visiting sites. In the event of problems being observed, these should be reported to the Health and Safety Manager.

The Company Health and Safety Advisor monitors the implementation of the health and safety policy by reviewing the contents of safety management files during the two annual QA audits randomly selected locations.

The findings of the inspections and audits are copied to the Company Health and Safety Advisor, Managing Director, Quality Manager and Line Managers and copies are displayed on notice boards as appropriate.

The Company Health and Safety Advisor / Quality Manager are responsible for advising the Managing Director as to where amendments are required in the safety policy to ensure continued compliance with legislation. Our safety consultants periodically review the safety policy to ensure the general safety arrangements are in compliance with relevant safety legislation.

Record Keeping Requirements

- Copies of completed internal audits should be kept in the safety management file.
- Copies of audits carried out by the Quality Manager should be kept in the safety management file.

16 - New and Expectant Mothers

Summary Requirement

Employers must assess the risks to which new and expectant mothers are exposed whilst carrying out their work activities. Adequate facilities and arrangements for rest breaks should be provided and where necessary changes should be made to working conditions or alternative work should be offered. The employee should be suspended on full pay where there is no suitable alternative work.

Company Procedure

On notification of pregnancy Managers are responsible for:

- Reviewing the work undertaken and assessing hazards that may be of increased risk to new and expectant mothers; and
- Ensuring appropriate arrangements are made for access to rest facilities and rest breaks.

The risk assessment must be carried out with the participation of the mother, recorded and held in the employees personnel file.

The assessments should be reviewed as the pregnancy progresses and particularly following any recommendations from the mother's General Practitioner or Midwife. The risk assessment should also be reviewed prior to the mothers return to work to ensure the continued protection of the mother and her new baby. The risk assessment should continue to be reviewed until the mother is fully recovered (particularly following a caesarean section or birth complications including still birth) or on the cessation of breast feeding.

Assistance in undertaking risk assessments is available from the Company Health and Safety Advisor.

Record Keeping Requirements

- Completed risk assessments for new and expectant mothers should be filed in the employees personnel file.

17 - Noise at Work

Summary Requirement

High noise levels can permanently damage hearing. The danger depends on how loud the noise is and exposure period. The damage builds up gradually and employees may not notice changes from one day to another, but once the damage is done there is no cure. The Noise at Work Regulations require employers to:

- Introduce a purchasing policy that specifies maximum noise levels emitted by new work equipment;
- Maintain up to date noise assessments;
- Reduce noise exposure as far as is reasonably practicable by means other than hearing protection;
- Make employees aware of the risk of noise induced hearing loss and make available appropriate hearing protection where noise levels are between the first and second action levels (80dBA and 85dBA);
- Designate mandatory hearing protection zones and enforce the use of hearing protection where noise levels are at or above the second action level; and
- Provide adequate information and training to employees regarding the use of noise control equipment, where and when to use hearing protection, how to look after it and what to do if they find anything wrong with the equipment.

Company Procedure

Managers / Line Managers should ensure noise assessments are carried out for areas under their control and that noise levels produced by new work equipment is below the first action level wherever possible. Contract Managers are responsible for ensuring exposure to noise is considered during development of the site specific risk assessments and, if noise is identified as a hazard, the noise risk assessment and control measures should be included in the assignment instructions. Assistance with noise assessments can be obtained through the Company Health and Safety Advisor.

Where risk assessment identifies a requirement for the issue and wearing of hearing protection Hackle shall issue the equipment, or ensure the customer supplies it where such an agreement exists. Employees shall be advised of the hearing protection zones at their work locations and any other significant findings from the risk assessment.

Employees required to work in noisy areas should be provided with information and/or training regarding noise induced hearing loss and how it can be avoided.

Record Keeping Requirements

- Completed risk assessments for Hackle premises should be retained in the safety management file or, for contract sites, in the assignment instructions.
- Provision of information and training to employees should be recorded in the information and training record in the safety management file.
- The provision of hearing protection equipment should be recorded in the PPE record in the safety management file.

18 – Occupational Driving

Statement

Management of Occupational Road Risk (MORR) Policy

Hackle Security Services Limited (HSS) is committed to safeguarding the health, safety and welfare of its employees and other persons who may be at risk from, or come into contact with, any of the company's business activities by achieving a cycle of continuous improvement in road safety performance.

This approach is underpinned by a proactive and positive road safety culture lead by senior management with the full support of the workforce, in an environment of continuous improvement. Management, employees and those working on behalf of the Company are reminded that they have a duty and responsibility to manage their own work activities in line with this policy.

HSS will manage work related road safety by:

- Ensuring that it is compliant with all relevant, applicable legislation and other requirements pertaining to the management of work related road safety.
- Gathering and analysing key safety and risk data on our vehicles, journeys, driver's crashes, causes and costs.
- Setting and communicating clear company road safety objectives.
- Introducing targeted safety measures, based on suitable risk assessment.
- Ensuring that road safety is considered in any projects and investment decisions.
- Monitoring performance, learning from accidents and incidents, and reporting all significant accidents and incidents to the Board.
- Carrying out periodic performance reviews in order to feedback lessons learned and ensure continual improvement.

The Managing Director / Quality Manager will make certain that the Company's Management of Occupational Road Risk Policy and the associated arrangements are fully implemented and communicated to all employees and other persons working for or on behalf of the Company.

Signed:

Mark Mathurin
Managing Director

March 2013

19 - Personal Protective Equipment (PPE)

Summary Requirement

Employers are required to provide employees with personal protective equipment (PPE) where it is not possible to reduce the risk by other means. Personal protective equipment provided to protect against a specified risk must be provided free of charge. Employers must ensure that the protective equipment provided is suitable for its intended use and that employees are provided with any information regarding its safe use, storage, maintenance and replacement.

Company Procedure

Employees are provided with personal protective equipment appropriate to the general hazards associated with their work activities. Security Officers are issued with high visibility clothing and waterproof jacket and trousers to provide protection from bad weather where appropriate.

Additional PPE is provided where a risk assessment shows it is necessary to reduce a specified risk to an acceptable level. Where provided to protect against a specified risk, PPE is provided free of charge. The risk assessment should identify the appropriate type and any safety critical information regarding the storage, maintenance and use of the PPE.

Employees are required to co-operate by wearing, storing and maintaining their PPE in accordance with the information and instruction provided and for reporting any defects with equipment to enable timely replacement or repair.

The type and specification of PPE should be detailed on the PPE schedule along with a description of the hazard it is issued to protect against. The issue of PPE should be recorded on the PPE issue record or the Hackle uniform issue form. Employees are required to sign to the appropriate record form to confirm receipt of the PPE issued.

Record Keeping Requirements

- Completed PPE schedules should be kept in the safety management file.
- Records of PPE issue should be kept in the safety management file.

20 - Risk Assessment: Hackle Office Premises

Summary Requirement

The Management of Health and Safety at Work Regulations require all employers to assess risks to staff and others arising from their undertakings. The assessment should:

- Identify the hazards present;
- Identify persons at risk;
- Identify any groups of persons at special risk (including pregnant and nursing mothers and young persons); and
- Evaluate the risk, taking account of existing control measures.

The purpose of the assessment is to identify the measures that should be taken to ensure the safety of those at risk and confirm compliance with applicable statutory requirements. It should ignore trivial risks and should not be obscured by excess information. The significant findings of assessments should be recorded and provided to appropriate employees.

Company Procedure

Generic risk assessments have been undertaken of the foreseeable hazards associated with office activities and summaries of the assessments are included in the handbook issued to office based employees. The generic assessments for office work cover:

- Slips trips and falls;
- Use of electrical appliances;
- Access to high level shelving;
- Occupational driving;
- Use of filing cabinets; and
- Use of photocopiers.

Managers / Line Managers are responsible for ensuring that the generic risk assessments are amended to make them effective in identifying and reducing the risks associated with the areas and activities under their control and for undertaking site specific assessments of any hazards not covered by the generic risk assessments.

Managers are responsible for ensuring that the safe systems of work defined in risk assessments are brought to the attention of all office based employees and for monitoring employees to ensure they are adhere to the requirements on a day to day basis.

Risk Assessments - Specific Hazards

Specific regulations and guidance have been produced by the HSC which require detailed assessments of the following:

- Substances Hazardous to Health;
- Manual Handling Operations;
- Display Screen Equipment; and
- Fire Safety in Buildings.

Managers are responsible for assessing the hazards associated with the areas or activities under their control and where a significant risk from any of the above hazards is identified reference should be made to the specific arrangements detailed in the safety management file.

Record Keeping Requirements

- Amended and / or site specific risk assessments for office premises should be kept in the safety management file.
- The provision of information relating to amended or site specific assessments should be recorded in the information and training record form in the safety management file.

21 - Risk Assessment: Customers Premises

Summary Requirement

The Management of Health and Safety at Work Regulations require all employers to assess risks to staff and others arising from their undertakings. The assessment should:

- Identify the hazards present;
- Identify persons at risk;
- Identify any groups of persons at special risk (including pregnant and nursing mothers and young persons); and
- Evaluate the risk taking account of existing control measures.

The purpose of the assessment is to identify the measures that should be taken to ensure the safety of those at risk and confirm compliance with applicable statutory requirements. It should ignore trivial risks and should not be obscured by excess information. The significant findings of the assessment should be recorded.

As such Hackle are responsible for assessing the risks associated with the services that are provided by Security Officers on client's sites, and clients should provide Hackle with assessments of the risks arising from their business activities that could affect Hackle Security Officers whilst they are working on site.

The Health, Safety and Welfare Regulations require employers to provide adequate welfare facilities for their employees whilst at work. These facilities include:

- Sanitary conveniences;
- Washing facilities;
- A supply of wholesome drinking water;
- Accommodation for clothing;
- Facilities for changing into / out of special clothing;
- Facilities for preparing / obtaining hot food and drinks; and
- Facilities to rest and to eat meals.

To ensure these requirements can be complied with where employees work on customer sites, the Management of Health and Safety at Work Regulations require employers to co-operate and co-ordinate their health and safety activities to ensure that health and safety requirements are complied with and adequate welfare facilities provided.

Company Procedure

Hackle Security Services are legally responsible for ensuring the health and safety of all their employees wherever they are employed to work. This responsibility includes protecting employees from the risks arising from the activities that they are employed to undertake and ensuring that adequate precautions are taken to protect employees from the risks arising from the activities undertaken by clients on contract sites. Our clients also have a legal responsibility to ensure the risks from their businesses do not harm Hackle employees.

Generic risk assessments have been undertaken of the foreseeable hazards associated with guarding activities. The assessments have been used to develop generic safe systems of work that are included in the health and safety handbooks issued to Security Officers. The assessments and safe systems of work cover:

- Verbal and / or physical assault;
- Driving of company vehicles;
- Work near moving vehicles;
- Use of electrical appliances;
- Dealing with suspect packages; and
- Slips, trips and falls.

Contract Managers are responsible for undertaking site specific assessments to ensure the arrangements necessary for the health, safety and welfare of Security Officers are provided on contract sites.

Contract Managers should refer to the generic assessments of the risks associated with guarding activities, and obtain relevant information from the customer regarding the significant risks, emergency arrangements and welfare facilities on site when undertaking risk assessments.

Contract Managers must work with clients to ensure short term actions are taken to reduce any risks identified in the assessments to an acceptable level before Security Officers are deployed on contract sites.

Copies of the completed health, safety and welfare assessments should be issued to the client and be included with the assignment instructions for the site. An additional copy should be kept in the Site-File at the operational office of Hackle Security.

Contract Managers are responsible for monitoring compliance with the assignment instructions during site visits and raising any issues relating to the hazards from the business activities on the site with the client during monthly meetings, or sooner dependent on the level of risk.

The Operations Manager is responsible for reviewing the progress of site specific assessments and the implementation of resulting recommendations with Contract Managers during monthly business review meetings.

Risk Assessments - Specific Hazards

Specific regulations and guidance have been produced by the HSC which require detailed assessments of the following:

- Substances Hazardous to Health;
- Manual Handling Operations;
- Display Screen Equipment; and
- Fire Safety in Buildings.

Where an assessment identifies a significant risk from any of the above hazards, reference should be made to the specific arrangements detailed in the safety management file.

Record Keeping Requirements

- Site specific safety and welfare assessments for contract sites should be included in the relevant customer file and the assignment instructions.

22 - Smoking

Summary Requirement

Smoking is prohibited in all enclosed workplaces and company vehicles in the United Kingdom.

Company Procedure

In accordance with current legal requirements smoking is prohibited in all enclosed Hackle premises or vehicle. This prohibition applies at all times, including outside normal working hours.

Smokers may smoke outside the premises at times, and in places, previously agreed with their line manager.

All visitors, temporary staff, contractors and customers will be expected to abide by the terms of the smoking policy.

Appropriate signs will be displayed at all entrances to premises and employees should tactfully remind visitors of the policy, if necessary.

Security Officers should observe the clients local arrangements for smoking whilst on site.

Record Keeping Requirements

- None.

23 - Stress

Summary Requirement

Employers are responsible for ensuring the health of their employees whilst at work. This includes the mental health of employees and ensuring that employees are not unnecessarily exposed to high levels or extended periods of stress at work.

Company Procedure

Excessive levels of stress can lead to mental and physical ill health including depression and nervous breakdown. It is the Company's policy to minimise work related stress so far as is reasonably practicable. Employees who are suffering from work related stress resulting from pressure of work or following a traumatic experience at work should advise their manager. Managers at all levels are responsible for:

- Monitoring the hours worked by the employees under their direction;
- Monitoring Hackle Security Officers who have been involved in traumatic incidents;
- Monitoring employees for signs of stress; and
- Reviewing how employees are managing work related stress during annual appraisals.

Managers should consider the causes of work related stress and implement measures to prevent employees suffering stress whilst at work.

Where causes of work related stress are identified in the workplace Managers should take appropriate action to remedy the causes. Where exposure to stressful / traumatic situations are unavoidable stress management training / counselling should be provided as necessary.

Record Keeping Requirements

- Records of stress management training and / or counselling are confidential and should be kept in the employee's personnel file. They should not be kept in the safety management file.

24 - Training

Summary Requirement

Employers must provide their employees with information and training to enable them to work safely and to discharge their defined safety responsibilities.

Company Procedure

All new starters, promoted and transferred employees are provided with information and training appropriate to their responsibilities as defined in the Hackle safety policy and the risks to which they may be exposed during their work.

Security Officers are provided with a two day on-site induction and training in accordance with the British Security Industry Association requirements. This training covers the Hackle health and safety policy, generic risk assessments and arrangements for providing site specific health and safety information.

All officers are provided with local induction training by the Managers / Line Managers. This training covers the Hackle safety policy, the local emergency arrangements and risk assessments applicable to their place of work.

In addition the following training is provided to enable specific safety responsibilities to be discharged:

- All Site Managers, Supervisors and Officers are provided with module awareness training and assessment. This training covers the main requirements of criminal and civil law for health and safety, the operation and implementation of the Hackle safety policy.
- Contract Managers are provided with general risk assessment training. This training provides Managers with the skills they need to identify hazards, quantify risk and introduce control measures necessary to reduce risks to an acceptable level.

Training is conducted at appropriate intervals throughout the year and always following the installation of new equipment or significant alteration to the existing systems of work. The provision of all information and training should be recorded to confirm that it has been provided and understood. In addition all officers receive "Site Specific Training" on all matters relevant to the site to which they are assigned.

Record Keeping Requirements

- Induction training for all employees must be recorded using the induction training checklist copies of which should be kept in the employees personnel file.
- Security Officer training should also be recorded on the Officer's general Training and Performance Record.

25– Work at Height

Summary Requirement

Employers are responsible for ensuring the need to work at height is avoided where possible. Where it is not possible to avoid the need to work at height, employers must undertake assessments to ensure the access equipment is suitable for its intended use, employees are trained to use it and it is maintained in a safe condition. Employers are also required to take precautions to prevent injury from persons falling through fragile roof materials and to prevent persons from being injured from falling objects.

Company Procedure

Where possible the need to work at height should be avoided.

Managers shall undertake a general risk assessment where the need to work at height cannot be avoided.

The assessment should ensure that:

- access equipment to be used is suitable for its intended use
- access equipment is maintained in safe condition and regularly inspected by competent persons
- employees using access equipment are trained in its use
- precautions are taken to protect access equipment from being struck by moving vehicles
- edge protection is provided for work places where persons could fall and suffer injury
- precautions are taken to prevent persons falling through fragile roofs or roof lights
- precautions are taken to minimise the effect of someone falling
- precautions are taken to protect persons below from falling materials

Assistance in undertaking work at height assessments is available from the Hackle Security Safety Advisor.

Employees may only use access equipment if they have been trained and authorised to do so.

Employees authorised to use access equipment should undertake pre-use checks to ensure it is safe for use.

Defective access equipment should be reported and withdrawn from use immediately.

Record Keeping Requirements

- Assessments of work at height activities should be kept in the appropriate general risk assessment section of this safety management file.
- Information and training provided to employees regarding the use of access equipment should be recorded in the information and training sections with employees personnel file.