

SECOM
Health and Safety
Policy
2024

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15	Amendments made to the CDM regulations (2015)	D Booth	Jan 2016
16	Health Surveillance & Lone Working added to the policy	D Booth	Jan 2017
18	Mental Health added and some changes within sections 2.2 and 3.8 of the policy	D Booth	Jan 2019
19	Several amendments have been made throughout the document	D Booth	Jan 2020
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21	Removed quality assurance manager position & replaced with training manager & head of compliance	D Booth	Jan 2022
22	Removed key response section, removed logistics officer section, other minor amendments made throughout the policy	D Booth	Jan 2023
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SECTION 1 POLICY STATEMENT

It is the SECOM Plc's policy that its operations shall be conducted in such a way as to ensure; so far as is reasonably practicable, the Health, Safety and Welfare of its employees and of any other person who may be affected by its operations are carried out safely.

The Managing Director has overall responsibility for Health, Safety and Welfare and will actively pursue the objectives of the policy in-conjunction with fellow Directors, General Manager/Regional Operations/Sales Managers, Department Managers and Line Management and Safety Advisors. Each Regional Operations Manager / Department Manager / Regional Sales Manager is accountable to their Line Director for the overall implementation of the policy.

The Company requires that a high standard of Safety, Health and Welfare shall be achieved and consistently maintained at all its places of work and offices.

The Company acknowledges the fact that safety and operational efficiency are complementary and that the use of safe working practices and accident prevention techniques are a most important responsibility of Management. The company will commit adequate financial and physical resource in order to continually improve our health and safety performance.

The requirements of the Health and Safety at Work, etc. Act 1974, and all legislation relevant thereto shall be regarded as the minimum standard of Health, Safety and Welfare to be achieved. Where Safety Representatives are appointed under the provisions of the Health and Safety at Work etc. Act 1974 they will be required to conform to the statutory regulations governing the function and to assist Management in obtaining the maximum benefit in Health, Safety and Welfare matters to be derived from joint consultation.


Protective clothing and equipment shall be provided and shall be used by all employees when the nature of the work being carried out requires the use of such protective gear in the interests of safety and accident prevention. All employees shall be encouraged to submit suggestions and ideas for improving the general standards of Health, Safety and Welfare at places of work and offices.

Employees have a duty under Section 7 of the Health and Safety at Work, etc. Act 1974 to take reasonable care for their own safety and the safety of any other person who may be affected by their acts or omissions and to co-operate with the Company in its arrangements to perform or comply with statutory safety obligations which include adherence to the Company Safety Policy.

Any employees, regardless of status, found to be deliberately and / or consistently negligent in the performance of the Company Policy on Health, Safety and Welfare shall be subject to disciplinary procedures.

The Health and Safety Policy will be communicated to all new employees and amendments to existing policy will also be communicated to all existing employees.

Formal review of the Health and Safety Policy will occur once a year unless deemed necessary by changes in legislation and / or need due to improved practices.



Satoru Awano

Satoru Awano
Managing Director
SECOM PLC
Revised January 2024

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SECTION 2 ORGANISATION

2.1 THE COMPANY SAFETY POLICY

2.1.1 The Company Safety Policy has been designed to achieve the following: -

2.1.1.1 The prevention of injury to all persons affected by Company operations, damage to property and loss.

2.1.1.2 The observance of the requirements of the Health and Safety at Work, etc., 1974, and all obligations under those acts and any regulations published under those Acts.

2.1.1.3 To ensure that all levels of staff receive adequate training.

2.1.1.4 To insist that staff always observe safe working practices, by reference to any relevant Code of Practice.

2.1.1.5 To reduce wherever practicable, injuries and damage to zero.

2.2 THE COMPANY STRUCTURE

2.2.1 The company is divided into Head Office, Regional Centres, a Physical Division, Area Office, and Satellite Offices

Note: When the Executive Management Team is stated, this includes the following positions: - Managing Director, Financial Director, Commercial/Sales & Marketing Director, Operations Director, and the Health and Safety Manager.

2.2.2 The Managing Director is responsible for the activities of the Financial Director, Commercial/Sales & Marketing Director, Operations Director, Health, and Safety Manager.

2.2.3 The Commercial/Sales & Marketing Director is responsible for the activities of the Regional Sales Managers and sales operation of the Physical Division, General Manager and Department Manager. Regional Sales Manager and sales operation of the Physical Division Manager, General Manager and Regional Manager is responsible locally for the Health and Safety of those based at and working for sales operation in the regional centres, satellite offices, physical division office or area office. Regional Sales Manager and sales operation of the Physical Division Manager, General Manager (Sales Operation) and Regional Manager will report on health and safety matters to the Sales & Marketing Director.

2.2.4 The Commercial/Sales & Marketing Director, Operations Director, Finance Director, General Managers, Regional Managers and Department Manager are responsible for the activities of regional centres, satellite offices or area offices. Each General Manager, Regional Manager or Department Manager is responsible locally for the Health and Safety of those based at and working for regional centres or area offices and satellite offices. The General Manager (operational issues), Regional Manager or Department Manager will report on health and safety matters to Commercial/Sales & Marketing Director/Operations Director.

2.2.4.1 The General Managers, Regional Managers or Department Manager will maintain the day-to-day standards of health and safety by the provision of such tools, equipment, and supervision as are necessary to ensure the health and safety of employees. They will be

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assisted by Installation/Service/Engineering Managers/Supervisors who will maintain healthy and safe conditions at the workplace.

2.2.5 The Commercial/Sales & Marketing Director is responsible for the activities of the National Accounts department and responsible locally for the Health and Safety of those based at and working for National Accounts department located in the national account's offices, regional centres, satellite offices, physical division office or area office. The line managers under the control of the Sales & Marketing Director will report on health and safety matters to the Sales & Marketing Director.

2.2.6 The physical Division Manager is responsible for the activities of the Physical Division. The Physical Division Manager is responsible locally for the Health and Safety of those based at or working for Physical Division. The Physical Division Manager will report on operational health and safety matters to the Commercial/Sales & Marketing Director.

2.2.6.1 The Physical Division Manager will maintain the day-to-day standards of health and safety by the provision of such tools, equipment, and supervision as are necessary to ensure the health and safety of employees. They will be assisted by workshop foreman who will maintain healthy and safe conditions at the workplace.

2.2.7 The Control & Command Centre Manager is responsible for the activities of the Control & Command Centre. The Control & Command Centre Manager is responsible locally for the Health and Safety of those based at or working for Control & Command Centre. The Control & Command Centre Manager will report on health and safety matters to the Commercial/Sales & Marketing Director/Operations Director.

2.2.7.1 The Control & Command Centre Manager will maintain the day-to-day standards of health and safety by the provision of safe working environment, workstations, and supervision as are necessary to ensure the health and safety of employees. They will be assisted by shift supervisors who will maintain healthy and safe conditions at the workplace.

2.2.8 The Training Manager is responsible for the activities of the training department. The Training Manager is responsible locally for the Health and Safety of those based within training department. The Training Manager will report on health and safety matters to the Commercial/Sales & Marketing Director.

2.2.8.1 The Training Manager will maintain the day-to-day standards of health and safety by the provision of safe working environment, workstations, and supervision as are necessary to ensure the health and safety of employees.

2.2.9 The Product Manager is responsible for the activities of the central stores. The Product Manager is responsible locally for the Health and Safety of those based within central stores. The Product Manager will report on health and safety matters to the Finance Director.

2.2.9.1 The Product Manager will maintain the day-to-day standards of health and safety by the provision of safe working environment, workstations, and supervision as are necessary to ensure the health and safety of employees.

2.2.10 The IT System and Infrastructure Manager is responsible for the activities of the IT department. The IT System and Infrastructure Manager is responsible locally for the Health and

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Safety of those based within IT department. The IT System and Infrastructure Manager will report on health and safety matters to the Finance Director.

2.2.10.1 The IT System and Infrastructure Manager will maintain the day-to-day standards of health and safety by the provision of safe working environment, workstations, and supervision as are necessary to ensure the health and safety of employees.

2.2.11 The Health and Safety Manager is responsible for the activities of the northern compliance assistant. The compliance department is located within SECOM Plc offices these premises are controlled by others and who are responsible for maintaining a safe working environment, except under the responsibilities for employees of the company or unless stated elsewhere within this document.

2.2.12 All levels of staff and management will have access to competent safety advice. Managers and supervisors will in general terms maintain a supervisory role by advising employees in safe working practices.

2.3 HEALTH AND SAFETY ASSISTANCE

2.3.1 Competent persons have been appointed to assist in meeting obligations under Health and Safety legislation. These persons have sufficient knowledge and information to ensure that the safety policy is being adhered to.

2.3.2 In addition it is recognised that where specialist advice is necessary this will be sought from competent external advisers.

2.4 TRAINING

2.4.1 The Directors recognise their responsibility for the training of company employees. Safety awareness training will be provided by experienced trained staff from within SECOM Plc or commercial training providers.

2.5 JOINT CONSULTATION

2.5.1 The Directors recognise the importance of Joint Consultation with recognised Trade Union Representatives and will provide facilities for safety representative and safety committees when requested.

2.6 SITE HEALTH AND SAFETY SUPERVISION

2.6.1 Site health and safety supervision will be undertaken by Project Managers, Installation / Service / Engineering Managers and Supervisors implementing the Company Health and Safety Policy. Project Managers, Installation / Service / Engineering Managers and Supervisors will be given training in all aspects of health and safety to enable them to carry out their duties. Engineers shall also be provided with health and safety training to enable them to undertake their work without risks to those working for them or others who may be affected by the work.

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SECTION 3 RESPONSIBILITIES

3.1 DIRECTOR RESPONSIBLE FOR HEALTH AND SAFETY

3.1.1 The Managing Director accepts overall responsibility for all matters, including those regarding health safety and welfare. The Managing Director will: -

3.1.1.1 Administer and interpret the effective implementation of the Company Health and Safety Policy.

3.1.1.2 Understand the application of the Health and Safety at Work etc. Act 1974, and other legislation relevant to the company's business.

3.1.1.3 Arrange for adequate financial and physical resource to meet the requirements of the Health and Safety Policy and in order to continually improve our health and safety performance.

3.1.1.4 Discipline any member of staff failing to comply with the requirements of the Health and Safety Policy.

3.1.1.5 Review and recommend health and safety training requirements for all levels of employees in company.

3.1.1.6 Ensure the company has competent person/s appointed to assist in meeting obligations under Health and Safety legislation. These person/s to have sufficient knowledge and information to ensure that the safety policy is being adhered to.

3.1.1.7 Liaise with Health and Safety Manager and, as appropriate any, Health and Safety Advisor, over the full range of their duties and responsibilities, with respect to inspections, audits, reports, recommendations, changes in legislation and advice obtained from other parties.

3.1.1.8 Ensure that there are adequate means of distributing and communicating health, safety and welfare information obtained from the HSE, safety organisations, Trade Associations and the Health and Safety Advisor, regarding new methods of accident prevention, new legislation requirements and codes of practice.

3.1.1.9 Ensure that there are adequate means of receiving suggestions or consulting with employees regarding health and safety issues or concerns.

3.1.1.10 Ensure that if a request for a safety committee is made by at least 2 employees within the company, that a safety committee would be formed within 3 months of the request.

3.1.1.11 Set a personal example at all times with respect to health and safety

3.2 HEALTH AND SAFETY MANAGER

3.2.1 The Health and Safety Manager will: -

3.2.1.1 Have an understanding and knowledge of the applications of the Health and Safety at Work etc. Act 1974, and other legislation relevant to the company's business.

3.2.1.2 Carry out regular audits of the Company's operations regarding health and safety.

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- 3.2.1.3 Report any matters concerning health and safety to the Managing Director.
- 3.2.1.4 Receive information from Managing Director and other sources, e.g., the HSE, journals, Trade Associations, regarding new methods of accident prevention, new legislation requirements and code of practices.
- 3.2.1.5 Review information as in 3.2.1.4 also, with guidance of the Managing Director and Executive Management Team formulate company procedures for implementation by the line management.
- 3.2.1.6 Support line management with advice and assistance in the following areas but not limited to: - incident/accident investigation, risk assessments, selection of Personal Protective Equipment, selection of access equipment, training needs.
- 3.2.1.7 Report to the HSE all incidents or accidents as required by RIDDOR.
- 3.2.1.8 Record and hold records of: - Incident/Accidents, generic risk assessments for installation of equipment, office risk assessments, portable appliance testing, electrical installation tests.
- 3.2.1.9 Inform line management of periodic inspections required on portable appliances, electrical installations tests, Personal Protective Equipment checks, access equipment checks and tests where applicable.
- 3.2.1.10 Establish a method of communicating the health and safety message to ALL employees.
- 3.2.1.11 In-conjunction with other employees in the company compile Toolbox Talks and control issue to the relevant locations. Also hold records to whom toolbox talks have been given.
- 3.2.1.12 Issue Accident Bulletins as and when required. Also hold records to whom accident bulletins have been given.
- 3.2.1.13 Ensure risk assessments are carried out for the risk of fire within all locations occupied by the company. If any proposals to carry out material alterations to the premises, these to be assessed as to the effect of current fire precautions and arrange for the implementation of any modifications.
- 3.2.1.14 Set a personal example at all times with respect to health and safety.

3.3 HEAD OF COMPLIANCE AND TRAINING

3.3.1 The Head of Compliance and Training Manager will: -

- 3.3.1.1 Procedures and reporting for Legislative standards. (H&S, Equality Diversity, and Inclusion, GDPR, etc.)
- 3.3.1.2 Adherence and evidence for Business and industry standards. (NSI, BSEN, BAFE, ISO:9001, 14001, 27001, ESFA, and OFSTED)

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3.3.1.3 Monitor and support to all employees to maintain Accreditations and Awards achieved by SECOM Plc. (Chas, Achilles, Safe Contractor, Construction line, Trustpilot, ROATP, FESS, and ROSPA)

3.3.1.4 Develop knowledge skills and behaviours, to ensure SECOM deliver a quality service provision to all their customers.

3.3.1.5 Train and develop multi skilled engineers with recognised qualifications and skills to meet their customers' needs.

3.3.1.6 Provision of Report to the Board of Directors, on performance, adherence and quality improvement suggestions and results.

3.3.1.7 Provide support and guidance to all employees on issues, complaints, activities and near misses; to maintain safe working procedures, communications, and suitable evidence of adherence.

3.4 HEALTH AND SAFETY INSPECTOR / AUDITOR

3.4.1 The Health and Safety Inspector / Auditor will: -

3.4.1.1 Deputise the activities of the Health & Safety Manager in their absence.

3.4.1.2 Carry out ladder step ladder and leaning ladder inspections at least on an annual basis in the region that they cover.

3.4.1.3 Carry out PPE inspections and audits on engineers and record the findings.

3.4.1.4 Completing product audits on Installations for intruder, CCTV and Access control.

3.4.1.5 Follow up any corrective actions required on audits or inspections to ensure they are completed.

3.4.1.6 Ensure master meter is maintained and within its calibration period.

3.4.1.7 PAT testing of engineers work equipment.

3.4.1.8 NSI Technical audits to coordinate and complete with NSI inspectors.

3.4.1.9 NSI QA audits to attend when required.

3.4.1.10 Complete Health and Safety engineer site audits.

3.4.1.11 Support compliance team with any third-party audits.

3.4.1.12 Support the Health and Safety team with accident investigations as required.

3.4.1.13 Attend regional QA meetings as required.

3.4.1.14 Meter calibration checks for install and service engineers and update the registers.

3.5 EXECUTIVE MANAGEMENT TEAM

3.5.1 The Executive Management Team members will: -

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- 3.5.1.1 Administer and interpret the effective implementation of the company Safety Policy.
- 3.5.1.2 Understand the application of the Health and Safety at Work etc. Act 1974, and other legislation relevant to the company's business.
- 3.5.1.3 Discipline any member of staff failing to comply with the requirements of the Health and Safety Policy.
- 3.5.1.4 Liaise with Managing Director over the full range of their individual responsibilities, with respect to complying with the standards relevant to the company products, reports, recommendations, changes in legislation and company policy.
- 3.5.1.5 Ensure that all relevant health, safety welfare information obtained from the compliance department regarding new methods of accident prevention, new legislation requirements and codes of practice is acted upon.
- 3.5.1.6 Ensure that all information relevant to Health and Safety is effectively communicated to all their employees and anyone else who may be affected by our works.
- 3.5.1.7 Ensure that the responsibilities contained in relevant sections below are delegated to the relevant line manager and acted upon.
- 3.5.1.8 Assess the training needs of persons under their control and ensure that health and safety protective equipment is available as necessary.
- 3.5.1.9 Ensure induction training is carried out for all new starters.
- 3.5.1.10 Set a personal example at all times with respect to health and safety.

3.6 COMMERCIAL/SALES & MARKETING DIRECTOR

3.6.1 The Commercial/Sales & Marketing Director will: -

- 3.6.1.1 Ensure that the Health and Safety Policy is implemented within the National Accounts department, sales area of Regional Centres, Area Office, Satellite Offices and Physical Division.
- 3.6.1.2 Ensure that due consideration is given to the design of any system being installed regarding avoidance of foreseeable risks to health and safety of the installing persons and other persons present during installation, maintenance, and use of system. Also, the requirements and safe systems of work are discussed at quotation/tender stage.
- 3.6.1.3 Ensure that information on site risk assessments is made available to all parties requiring that information for health & safety plan and health & safety file, i.e., principal contractor, or planning supervisor. Also ensure that there is co-operation between principal contractor, planning supervisor and other contractors.
- 3.6.1.4 Ensure that health and safety information supplied to the company by other parties involved in the site is passed to engineering departments for inclusion in the engineer's pack for that site.

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3.7 OPERATIONS DIRECTOR

3.7.1 The Operations Director will: -

3.7.1.1 Ensure that the Health and Safety Policy is implemented within the operational area of Secom Plc.

3.7.1.2 Ensure that all accepted contracts can be carried out where reasonably practicable without risks to the health and safety of Company staff and any other persons associated with the work.

3.7.1.3 Ensure the periodic inspection of tools and access equipment.

3.7.1.4 Ensure that information on site risk assessments is made available to all parties requiring that information for health & safety plan and health & safety file, i.e., principal contractor or planning supervisor. Also ensure that there is co-operation between principal contractor, planning supervisor and other contractors.

3.7.1.5 Ensure that health and safety information supplied to the company by other parties involved in the site is passed to engineering departments for inclusion in the engineer's pack for that site:

3.7.1.6 Ensure all products selected for use in the installation and maintenance of systems are where reasonably practicable without a foreseeable risk of injury to persons installing, maintaining or user of the products.

3.8 DIVISIONAL OPERATIONAL DIRECTOR

3.8.1 The Divisional Operational Director will: -

3.8.1.1 Ensure that the Health and Safety Policy is implemented within the operational area of Secom HSS Division.

3.8.1.2 Ensure that all accepted contracts can be carried out where reasonably practicable without risks to the health and safety of Company staff and any other persons associated with the work.

3.8.1.3 Ensure the periodic inspection of tools and access equipment.

3.8.1.4 Ensure that information on site risk assessments is made available to all parties requiring that information for health & safety plan and health & safety file, i.e., principal contractor or planning supervisor. Also ensure that there is co-operation between principal contractor, planning supervisor and other contractors.

3.8.1.5 Ensure that health and safety information supplied to the company by other parties involved in the site is passed to engineering departments for inclusion in the engineer's pack for that site:

3.8.1.6 Ensure all products selected for use in the installation and maintenance of systems are where reasonably practicable without a foreseeable risk of injury to persons installing, maintaining or user of the products.

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3.9 FINANCE DIRECTOR

3.9.1 The Finance Director will: -

3.9.1.1 Ensure that the Health and Safety Policy is implemented within the finance, credit control, human resources, IT, and fleet departments of Secom Plc.

3.9.1.2 Ensure that all work carried out in the above-named departments is without risks to the company staff and any other persons associated with the work.

3.9.1.3 Ensure that all the necessary checks on vehicles are carried out by the fleet department prior to them been issued to Secom Plc employees.

3.9.1.4 Ensure the Secom driver intelligence checks are completed annually by all employees who use a vehicle to carry out their role.

3.9.1.5 Have an understanding of the Health & Safety at Work etc. Act 1974 and other legislation relevant to the company's operations.

3.10 GENERAL MANAGERS / REGIONAL MANAGERS / DEPARTMENT MANAGERS

3.10.1 The General Managers, Regional Managers, Department Managers will: -

3.10.1.1 Ensure that the Health and Safety Policy is implemented within the operational area of Regional Centres, Area Office, and Satellite Offices.

3.10.1.2 Ensure that information on site risk assessments is made available to all parties requiring that information for health & safety plan and health & safety file, i.e., principal contractor or planning supervisor. Also ensure that there is co-operation between principal contractor, planning supervisor and other contractors.

3.10.1.3 Ensure that health and safety information supplied to the company by other parties involved in the site is passed to engineering departments for inclusion in the engineer's pack for that site.

3.10.1.4 Organise the department, section, or workplace so that operations or work carried out is to a satisfactory standard of safety, resulting in there being minimal risk to persons, equipment, and materials; where complex operating procedures are involved, they will issue working instructions in writing.

3.10.1.5 Have an understanding of the application of the Health and Safety at Work etc. Act 1974, and other legislation relevant to the company operations.

3.10.1.6 Discipline any member of staff failing to comply with the requirements of the Health and Safety Policy.

3.10.1.7 Ensure that hazards from equipment operations, e.g., COSHH substances, material stacking, etc. are addressed, that the risk from them is understood and that corrective measures are implemented to prevent danger to employees or other persons.

3.10.1.8 Ensure that all accepted contracts can be carried out where reasonably practicable without risks to the health and safety of Company staff and any other persons associated with the work.

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- 3.10.1.9 Ensure that all information relevant to Health and Safety is effectively communicated to all their employees and anyone else who may be affected by our works.
- 3.10.1.10 Plan and maintain a tidy working area, including access to and from the plant/equipment being used.
- 3.10.1.11 Make sure that the control measures in place are always operable and not interfered with and that personal protective equipment, where appropriate, is available and is used.
- 3.10.1.12 Assess the training needs of persons under their control and ensure that health and safety protective equipment is available as necessary.
- 3.10.1.13 Ensure induction training is carried out for all new starters within their area of operation.
- 3.10.1.14 Co-operate with Health and Safety Manager /Advisors during their visits, act on their recommendations and accompany HSE inspectors on their visits.
- 3.10.1.15 Inform the Health and Safety Manager of any HSE inspections.
- 3.10.1.16 Ensure that fire prevention/fighting equipment, e.g., extinguishers, blankets and notices are readily available and visible within the operational area of Regional Centres, Area Office, and Satellite Offices.
- 3.10.1.17 Ensure that firefighting appliances are not misused.
- 3.10.1.18 Ensure that all firefighting equipment, e.g., extinguishers within the operational area of Regional Centres, Area Office and Satellite Offices are periodically checked by competent persons.
- 3.10.1.19 Review operating and work instructions and specific related hazards to employees transferred into the department and or new employees.
- 3.10.1.20 Ensure that first aid equipment and trained personnel are present in sufficient numbers, considering the hazards known to be present within the department, and make their location known to employees.
- 3.10.1.21 Ensure that all accidents are reported to the relevant person so that they may be entered in the accident book also incident report forms are completed and carried out as required.
- 3.10.1.22 Ensure the periodic inspection of tools and access equipment.
- 3.10.1.23 Ensure when advised by the Health and Safety Manager that test is due for locations which the company operates will have all fixed electrical installations tested and certificated by competent persons. Certificate when issued to be held on file at the location and copy to Health and Safety Manager.
- 3.10.1.24 Ensure that when portable appliance tests are due these are then carried out in accordance with Operating Procedure 05.
- 3.10.1.25 Set a personal example at all times with respect to health and safety.

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3.11 REGIONAL SALES MANAGERS / AREA MANAGER

3.11.1 Regional Sales Managers and Area Managers will: -

3.11.1.1 Ensure that the Health and Safety Policy is implemented within their operational area of Regional Centres, Area Office, and Satellite Offices.

3.11.1.2 Discipline any member of staff failing to comply with the requirements of the Health and Safety Policy.

3.11.1.3 Ensure that due consideration is given to the design of the system being installed regarding avoidance of foreseeable risks to health and safety of the installing persons and other persons present during installation, maintenance, and use of system. Also, that the requirements and safe systems of work are discussed at quotation/tender stage.

3.11.1.4 Ensure that information on site risk assessments is made available to all parties requiring that information for health & safety plan and health & safety file, i.e., principal contractor or planning supervisor. Also ensure that there is co-operation between principal contractor, planning supervisor and other contractors.

3.11.1.5 Ensure that health and safety information supplied to the company by other parties involved in the site is passed to engineering departments for inclusion in the engineer's pack for that site.

3.11.1.6 Organise the department, section, or workplace so that operations or work carried out is to a satisfactory standard of safety, resulting in there being minimal risk to persons, equipment, and materials, where complex operating procedures are involved, they will issue working instructions in writing.

3.11.1.7 Have an understanding of the application of the Health and Safety at Work etc. Act 1974, and other legislation relevant to the company's operations.

3.11.1.8 Ensure that consideration is given to all relevant Health and Safety requirements and that safe systems of work are discussed at quotation stage.

3.11.1.9 Ensure that hazards from equipment operations, e.g., COSHH substances, material stacking, etc. are addressed, that the risk from them is understood and that corrective measures are implemented to prevent danger to employees or other persons.

3.11.1.10 Ensure that all information relevant to Health and Safety is effectively communicated to all their employees and anyone else who may be affected by our works.

3.11.1.11 Plan and maintain a tidy working area, including access to and from the plant/equipment being used.

3.11.1.12 Make sure that the control measures in place are always operable and not interfered with and that personal protective equipment, where appropriate, is available and is used.

3.11.1.13 Assess the training needs of persons under their control and ensure that health and safety protective equipment is available as necessary.

3.11.1.14 Ensure induction training is carried out for all new starters within their area of operation.

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- 3.11.1.15 Co-operate with the Health and Safety team during their visits, act on their recommendations and accompany HSE inspectors on their visits.
- 3.11.1.16 Inform the Health and Safety Manager of any HSE inspections.
- 3.11.1.17 Ensure that firefighting appliances are not misused.
- 3.11.1.18 Review operating and work instructions and specific related hazards to employees transferred into the department and or new employees.
- 3.11.1.19 Ensure that first aid equipment and personnel are present in sufficient numbers, considering the hazards known to be present within the department, and make their location known to employees.
- 3.11.1.20 Ensure that all accidents are reported to the relevant person so that they may be entered in the accident book, also incident report forms are completed and carried out as required.
- 3.11.1.21 Set a personal example at all times with respect to health and safety.

3.12 INSTALLATION / SERVICE / ENGINEERING MANAGERS, SUPERVISORS and PROJECT MANAGERS

3.12.1 The Installation / Service / Engineering Managers, Supervisors and Project Managers will: -

- 3.12.1.1 Ensure that the Health and Safety Policy is implemented within their area of operation.
- 3.12.1.2 Discipline any member of staff failing to comply with the requirements of the Health and Safety Policy.
- 3.12.1.3 Ensure that information on site risk assessments is made available to all parties requiring that information for health & safety plan and health & safety file, i.e., principal contractor or planning supervisor. Also ensure that there is co-operation between principal contractor, planning supervisor and other contractors.
- 3.12.1.4 Ensure that health and safety information supplied to the company by other parties involved in the site is passed to engineering departments for inclusion in the engineer's pack for that site.
- 3.12.1.5 Organise the department, section, or workplace so that operations or work carried out is to a satisfactory standard of safety, resulting in there being minimal risk to persons, equipment, and materials, where complex operating procedures are involved, they will issue working instructions in writing.
- 3.12.1.6 Have an understanding of the application of the Health and Safety at Work etc. Act 1974, and other legislation relevant to the company operations.
- 3.12.1.7 Ensure that hazards from equipment operations, e.g., COSHH substances, material stacking, etc. are addressed, that the risk from them is understood and that corrective measures are implemented to prevent danger to employees or other persons.

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3.12.1.8 Ensure that all accepted contracts can be carried out where reasonably practicable without risks to the health and safety of Company staff and any other persons associated with the work.

3.12.1.9 Ensure that all information relevant to Health and Safety is effectively communicated to all their employees and anyone else who may be affected by our works.

3.12.1.10 Plan and maintain a tidy working area, including access to and from the plant/equipment being used.

3.12.1.11 Make sure that the control measures in place are always operable and not interfered with and that personal protective equipment, where appropriate, is available and is used.

3.12.1.12 Assess the training needs of persons under their control and ensure that health and safety protective equipment is available as necessary.

3.12.1.13 Co-operate with the Health and Safety team during their visits, act on their recommendations.

3.12.1.14 Inform their line manager of any HSE inspections.

3.12.1.15 Ensure that firefighting appliances are not misused.

3.12.1.16 Review operating and work instructions and specific related hazards to employees transferred into the department and or new employees.

3.12.1.17 Ensure that first aid equipment and personnel are present in sufficient numbers, considering the hazards known to be present within the department, and make their location known to employees.

3.12.1.18 Ensure that all accidents are reported to the relevant person so that they may be entered in the accident book also incident report forms are completed and carried out as required.

3.12.1.19 Ensure the periodic inspection of tools and access equipment.

3.12.1.20 Carry out regular inspection in respect to health and safety of onsite activities to ensure compliance with company health and safety policy.

3.12.1.21 Set a personal example at all times with respect to health and safety.

3.13 PHYSICAL DIVISION MANAGER

3.13.1 The Physical Division Manager will: -

3.13.1.1 Ensure that the Health and Safety Policy is implemented within the operational area of Physical Division.

3.13.1.2 Discipline any member of staff failing to comply with the requirements of the Health and Safety Policy.

3.13.1.3 Ensure that due consideration is given to the design of the system being installed regarding avoidance of foreseeable risks to health and safety of the installing persons and

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other persons present during installation, maintenance, and use of system. Also, the requirements and safe systems of work are discussed at quotation/tender stage.

3.13.1.4 Ensure that information on site risk assessments is made available to all parties requiring that information for health & safety plan and health & safety file, i.e., principal contractor or planning supervisor. Also, ensure that there is co-operation between principal contractor, planning supervisor and other contractors.

3.13.1.5 Ensure that health and safety information supplied to the company by other parties involved in the site is passed to engineering departments for inclusion in the engineer's pack for that site.

3.13.1.6 Ensure that information on site risk assessments is made available to all parties requiring that information for health & safety plan and health & safety file, i.e., principal contractor or planning supervisor. Also ensure that there is co-operation between principal contractor, planning supervisor and other contractors.

3.13.1.7 Organise the department, section, or workplace so that operations or work carried out is to a satisfactory standard of safety, resulting in there being minimal risk to persons, equipment, and materials, where complex operating procedures are involved, they will issue working instructions in writing.

3.13.1.8 Have an understanding of the application of the Health and Safety at Work etc. Act 1974, and other legislation relevant to the company's operations.

3.13.1.9 Ensure that hazards from equipment operations, e.g., COSHH substances, material stacking, etc., are addressed, that the risk from them is understood and that corrective measures are implemented to prevent danger to employees or other persons.

3.13.1.10 Ensure that consideration is given to all relevant Health and Safety requirements and that safe systems of work are discussed at quotation stage.

3.13.1.11 Ensure that all accepted contracts can be carried out where reasonably practicable without risks to the health and safety of Company staff and any other persons associated with the work.

3.13.1.12 Ensure that all information relevant to Health and Safety is effectively communicated to all their employees and anyone else who may be affected by our works.

3.13.1.13 Plan and maintain a tidy working area, including access to and from the plant/equipment being used.

3.13.1.14 Make sure that the control measures in place are always operable and not interfered with and that personal protective equipment, where appropriate, is available and is used.

3.13.1.15 Assess the training needs of persons under their control and ensure that health and safety protective equipment is available as necessary.

3.13.1.16 Co-operate with the Health and Safety team during their visits, act on their recommendations and accompany HSE inspectors on their visits.

3.13.1.17 Inform the Health and Safety Manager of any HSE inspections.

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- 3.13.1.18 Ensure that fire prevention/fighting equipment, e.g., extinguishers, blankets and notices are readily available and visible within the operational area.
- 3.13.1.19 Ensure that all firefighting equipment, e.g., extinguishers within the operational area are periodically checked by competent persons.
- 3.13.1.20 Ensure that firefighting appliances are not misused.
- 3.13.1.21 Ensure when advised by the Health and Safety Manager that test is due for locations which the company operates will have all fixed electrical installations tested and certificated by competent persons. Certificate when issued to be held on file at the location and copy to Health and Safety Manager.
- 3.13.1.22 Ensure when that when portable appliances test is due these are then carried out in accordance with Operating Procedure 05.
- 3.13.1.23 Review operating and work instructions and specific related hazards to employees transferred into the department and or new employees.
- 3.13.1.24 Ensure that first aid equipment and personnel are present in sufficient numbers, in light of the hazards known to be present within the department, and make their location known to employees.
- 3.13.1.25 Ensure that all accidents are reported to the relevant person so that they may be entered in the accident book also incident report forms are completed and carried out as required.
- 3.13.1.26 Ensure that the periodic inspection of tools and access equipment.
- 3.13.1.27 Ensure when advised by the Health and Safety Manager that tests are due for portable appliances, these are then carried out in accordance with Operating Procedure 05.
- 3.13.1.28 Set a personal example at all times with respect to health and safety.

3.14 SALES EXECUTIVES / NATIONAL ACCOUNT SALES EXECUTIVES

3.14.1 The Sales Executives / National Account Sales Executives will: -

- 3.14.1.1 Ensure that consideration is given to all relevant Health and Safety requirements and safe systems of work are discussed at quotation stage.
- 3.14.1.2 Ensure that you give due consideration to the design of the system being installed regarding avoidance of foreseeable risks to health and safety of the installing persons and other persons present during installation, maintenance, and use of system. Also, ensure you discuss the requirements and safe systems of work at quotation/tender stage.
- 3.14.1.3 Ensure that on completion of system design if the installation was to invoke the full requirements of Construction (Design and Management) Regulations (Current Issue), will advise the client that CDM regulations are being invoked.
- 3.14.1.4 Ensure that information on site risk assessments is made available to all parties requiring that information for health & safety plan and health & safety file, i.e., principal

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contractor or planning supervisor. Also ensure that there is co-operation between principal contractor, planning supervisor and other contractors.

3.14.1.5 Ensure that health and safety information supplied to you on behalf of the company by other parties involved in the site is passed to engineering departments for inclusion in the engineer's pack for that site.

3.15 ENGINEERS

3.15.1 The Engineers will: -

3.15.1.1 Inspect all ladders, steps, other access equipment and portable appliances before use and if found defective, will not use, and shall report it to their line manager.

3.15.1.2 Ensure that any control measures specified by risk assessments or training for carrying out tasks are implemented.

3.15.1.3 Ensure when working on shared sites comply with instructions given regarding health and safety and co-operate with others to ensure a healthy and safe workplace.

3.15.1.4 When driving company vehicles ensure that checks are carried out in line with the company car policy and are in a road worthy condition.

3.15.1.5 Ensure periodic checks are carried out on first aid kits within the company vehicle to check stock levels and condition.

3.16 FIRST AIDERS

3.16.1 The First Aiders will: -

3.16.1.1 Ensure that first aid facilities, equipment, and personnel are readily available.

3.16.1.2 Carry out first aid in accordance with Health and Safety at Work (First Aid) training received.

3.16.1.3 Ensure that all first aid administered is recorded in accident book and first aid treatment book.

3.16.1.4 Ensure periodic checks are carried out on first aid boxes to check stock levels and condition.

3.17 ALL EMPLOYEES

3.17.1 All Employees will: -

3.17.1.1 Only use access equipment supplied by the company or use has been approved by the company.

3.17.1.2 Carry out all operations and work in the prescribed manner.

3.17.1.3 Use the correct tools and equipment for the operation or work, including any relevant personal protective equipment provided.

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- 3.17.1.4 Report any defect in plant or equipment immediately to their line manager.
- 3.17.1.5 Undertake their work with due regard for the health and safety of themselves and others and will conform to the Company Health and Safety Policy.
- 3.17.1.6 Avoid improvising or taking short cuts, which would entail unauthorised and unnecessary risks.
- 3.17.1.7 Inform transferred and new employees of hazards involved in the operation/work of the department.
- 3.17.1.8 In any case of doubt as to the safe procedure to be followed, consult their line manager for advice.
- 3.17.1.9 Report accidents/incidents to their line manager.
- 3.17.1.10 Suggest ways of eliminating hazards.
- 3.17.1.11 Co-operate in the investigation of accidents with the objective of introducing methods to prevent a recurrence.
- 3.17.1.12 Ensure co-operation with the company in matters of health and safety, failure to co-operate may result in disciplinary action.
- 3.17.1.13 Not undertake any work if that work endangers the health or safety of themselves or any other persons.
- 3.17.1.14 Set a personal example at all times with respect to health and safety, especially to young workers or new members of the department.

3.18 SUB-CONTRACTORS

3.18.1 The Sub-Contractors will: -

- 3.18.1.1 Complete a questionnaire and supply support documentation to enable SECOM Plc to assess the competence of the Sub-Contractor regarding health and safety.
- 3.18.1.2 Comply with the Health and Safety at Work etc. Act 1974 and all other regulations, statutory requirements applicable to their works.
- 3.18.1.3 Co-operate with SECOM Plc and other persons on site in relation to Health and Safety matters to ensure the workplace / site is a safe environment.
- 3.18.1.4 Produce Risk Assessments and Method Statements for the work to be carried out to clearly demonstrate the planned avoidance of risks to safety to all persons in the workplace / site.
- 3.18.1.5 Ensure all plant and equipment is maintained in a safe useable condition and is used safely as to not cause risks to health and safety to themselves or other persons in the workplace / site.
- 3.18.1.6 Comply with SECOM Plc Health & Safety Policy.

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3.18.1.7 Ensure any Sub-Contractors employed by the Sub-Contractor are assessed for compliance with the Health and Safety at Work etc. Act 1974 and all other regulations, statutory requirements applicable to their works.

3.18.1.8 Ensure all accidents or incidents related to works carried out on behalf of SECOM Plc are reported as defined by Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (Current Issue), with copies to SECOM Plc.

3.18.1.9 Ensure all their employees or employed Sub-Contractors working in the workplace or site are fully trained and competent persons to carry out the tasks required by them.

SECTION 4 ARRANGEMENTS

4.1 QUOTATION / TENDERING

4.1.1 SECOM Plc principal roles are designer of security system and contractor. The type of work carried out by SECOM Plc as sole contractor on site would not normally invoke the project to become notifiable under The Construction (Design and Management) Regulations (Current Issue). The only requirement invoked on us is the design requirement. Our normal contract work, when a sole contractor on site, is of shorter duration than many other contractors, which does not involve more than 5 persons on site at any one time or last more than 30 days. However, if other contractors are involved, we are normally one of the smaller contractors i.e., job size. Therefore, the role of principle contractor usually falls upon the larger contractor.

4.1.2 If the installation of our product was to invoke the full implementation of The Construction (Design and Management) Regulations (Current Issue) we would advise the client that this project would invoke the full requirements of the CDM regulations. If SECOM Plc was the larger contractor and we are requested to assume the role of principle contractor, we would employ a competent person or company to undertake this role.

4.1.3 Persons undertaking this role will be suitably trained and will review the site requirements. Once the needs have been assessed a schedule of system design will be configured. The client or principal contractor to provide information on site hazards; if any are identified these will be reviewed. Then an assessment will take place to view the foreseeable health and safety risks involved in the installation, maintenance, and use of the system, if any are identified these will be assessed to see if alternatives can be found to eliminate those risks (see section 4.2.5). If elimination is not reasonable and practicable then control measures will be used to reduce the risk. On sites where The Construction (Design and Management) Regulations (Current Issue) are invoked, SECOM Plc will provide the principal contractor, or if not appointed, the planning supervisor with health and safety information for compiling a health and safety plan.

4.1.4 A contractor is anyone who directly employs or engages construction workers or manages construction work. Contractors include sub-contractors, any individual self-employed worker or business that carries out, manages, or controls construction work. They must have the skills, knowledge, experience and, where relevant, the organisational capability to carry out the work safely and without risk to health.

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Contractors and the [workers](#) under their control are most at risk of injury and ill health from construction work. Contractors therefore have an important role in planning, managing, and monitoring their work to ensure any risks are controlled.

Contractors on **all projects** must:

- make sure the [client](#) is aware of the client duties under CDM 2015 before any work starts
- plan, manage and monitor all work carried out by themselves and their workers, taking into account the risks to anyone who might be affected by it (including members of the public) and the measures needed to protect them.
- check that all workers they employ or appoint have the skills, knowledge, training and experience to carry out the work, or are in the process of obtaining them.
- make sure that all workers under their control have a suitable, site-specific induction, unless this has already been provided by the [principal contractor](#)
- provide appropriate supervision, information, and instructions to workers under their control.
- ensure they do not start work on site unless reasonable steps have been taken to prevent unauthorised access
- ensure suitable welfare facilities are provided from the start for workers under their control, and maintain them throughout the work

In addition to the above responsibilities, contractors working on **projects involving more than one contractor** must:

- coordinate their work with the work of others in the project team
- comply with directions given by the [principal designer](#) or principal contractor
- comply with parts of the [construction phase plan \(PDF\)](#) relevant to their work

Where a contractor is **the only contractor working on a project**, they must ensure a [construction phase plan \(PDF\)](#) is drawn up before setting up the site.

When working as the only contractor for a [domestic client](#), the contractor takes on the client duties, as well as their own as contractor. However, this should involve them doing no more than they will normally do to comply with health and safety law.

Where a domestic project involves more than one contractor, the principal contractor normally takes on the client duties and the contractor will work to the principal contractor as 'client'. If the domestic client does not appoint a principal contractor, the role of the principal contractor must be carried out by the contractor as principal contractor and the client duties must be carried out by the contractor in control of the construction phase and the client duties must be carried out by the contractor as principal contractor. Alternatively, the domestic client can ask the principal designer to take on the client duties (although this must be confirmed in a written agreement) and the contractor must work to them as 'client' under CDM 2015.

4.2 RISK ASSESSMENTS

4.2.1 General

4.2.1.1 The Management of Health and Safety at Work Regulations (MHSWR) (Current Issue) requires that all risks to workers and any other persons who may be affected by their undertaking should be assessed. These findings should be recorded. This record should represent an effective statement of hazards and risks which then leads management to take the relevant actions to protect health and safety.

4.2.1.2 The findings should include.

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4.2.1.2.1 The hazards identified in the assessment. That is those hazards with the potential to cause harm to workers or other persons who might be affected by the work activity if they were not properly controlled.

4.2.1.2.2 The existing control measures in place, this need not include the full details if contained in Standard Operating Procedures but could refer to them.

4.2.1.2.3 Who may be affected by the risks or hazards.

4.2.1.3 The risk assessment to cover all our tasks, procedures, plant and so on. It is not an assessment of the person or their ability it is an assessment of the health and safety. When we carry out the assessments the assessors will need to know exactly how the work you are involved in is carried out, even if you think this is not the way it is supposed to be done. This helps the company ensure procedures being reviewed are what is happening in reality and therefore the risks can be correctly assessed.

4.2.1.4 The risk assessments are not a once only process these are to be periodically reviewed, if necessary, modified. The time of reviews is dependent on work practices, if they change the activity should be re-assessed, if incidents or accidents occur these assessments should be reviewed to see what changes have occurred or improvements can be made, if no changes have taken place these should still be reviewed. The company has a plan of scheduled review dates for risk assessments. These reviews do not always include all assessments because some assessments are for one off task which if completed by review date are no longer applicable.

4.2.1.5 If the process or activity has specific legislation that requires a specific risk assessment then these specific requirements will be assessed such as COSHH Regulations (Current Issue) (as amended), then the general requirements under The Management of Health and Safety at Work Regulations (Current Issue) are deemed to have been met. However, should the specific regulation which it was assessed under be removed an assessment is then required to be carried out under The Management of Health and Safety at Work Regulations (Current Issue).

4.2.1.6 Risk Assessments are carried out by competent persons. Competent people are people who have been trained in risk assessments and have the knowledge of the process being assessed.

4.2.2 Office

4.2.2.1 The tasks and hazards found at each company location with the exception of Physical Division are similar and, therefore the assessments produced are generic in nature. A generic assessment is admissible under The Management of Health and Safety at Work Regulations (Current Issue) where this is broadly appropriate to the type of work. Where there are hazards particular to individual offices, these are assessed separately.

4.2.2.2 Competent persons who carry out the assessments in company locations are selected by the experience and knowledge. These persons are co-ordinated by the Health and Safety Manager who may be involved in the assessments.

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4.2.2.3 Assessments are reviewed if task changes, new procedures are introduced, when the office moves to new premises or when a review date is reached.

4.2.2.4 It is the responsibility of the manager responsible for the company location to inform the Health & Safety Manager if they suspect that an assessment requires revision. Any queries regarding the risk assessments should be direct to the Health and Safety Manager.

4.2.2.5 Each company location shall hold copies of the risk assessments which should be made available to employees of the company.

4.2.2.6 Any new person starting employment with the company should be made aware of the risks at their location of work; this is to be done at their induction following the relevant company Safety Operating Procedure for that employee. If the person is under the age of 18 then a young worker's risk assessment will be carried out prior to work commencing.

4.2.3 Assessments by Equipment Used by Engineering

4.2.3.1 The tasks and hazards found in engineering using equipment is similar for each piece of equipment used therefore the assessments produced are generic in nature. A generic assessment is admissible under The Management of Health and Safety at Work Regulations (Current Issue) where this is broadly appropriate to the type of work.

4.2.3.1.1 Examples of some types of equipment assessed but not limited to are as follows:

(i) Ladders, steps, portable appliances (Drills) and mobile platforms motorised and non-motorised.

4.2.3.2 The generic assessments recorded are used as a guide to be carrying risk assessments by task i.e., fitting of movement detectors, control equipment and bell boxes etc.

4.2.3.3 Competent persons who carry out the assessments in equipment used are selected by the experience and knowledge. These persons are co-ordinated by the Health and Safety Manager who may be involved in the assessments.

4.2.3.4 Assessments are reviewed if task changes, new procedures are introduced or when review date is reached.

4.2.3.5 It is the responsibility of the manager responsible for the area of operation to inform the Health & Safety Manager, if they suspect that an assessment requires revision. Any queries regarding the risk assessments should be direct to the Health and Safety Manager.

4.2.3.6 Each company location shall hold copies of the risk assessments which should be made available to employees of the company.

4.2.3.7 Any new person starting employment with the company should be made aware of the risks at their location of work; this is to be done at their induction following the relevant company Safety Operating Procedure for that employee.

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4.2.4 Assessment by Process

4.2.4.1 The tasks and hazards found when generally installing or a maintaining the security product is similar for each type of product installed or maintained therefore the assessments produced are generic in nature. A generic assessment is admissible under The Management of Health and Safety at Work Regulations (Current Issue) where this is broadly appropriate to the type of work.

4.2.4.2 Examples of some types of products or processes are assessed but not limited to, are as follows:

(i) Installing movement sensors internally, drilling through walls, running cables, and fitting bell boxes.

4.2.4.2.1 The above involve combination of equipment (plant) to carry out the process this is why the generic assessments are used as a guide.

4.2.4.3 Competent persons who carry out the assessments of the processes are selected by the experience and knowledge. These persons are co-ordinated by the Health and Safety Manager who may be involved in the assessments.

4.2.4.4 Assessments are reviewed if task changes, new procedures are introduced or when review date is reached.

4.2.4.5 It is the responsibility of the manager responsible for the area of operation to inform the Health & Safety Manager, if they suspect that an assessment requires revision. Any queries regarding the risk assessments should be direct to the Health and Safety Manager.

4.2.4.6 Each company location shall hold copies of the risk assessments which should be made available to employees of the company.

4.2.4.7 Any new person starting employment with the company should be made aware of the risk at their location of work; this is to be done at their induction following the relevant company Safety Operating Procedure for that employee.

4.2.5 Risk Assessment when working on Customer Premises

4.2.5.1 The risk assessment in the first instance is carried out by the Sales Executive using the generic assessments for the various processes, i.e., installing movement sensors internally, drilling through walls, running cables, and fitting bell boxes.

4.2.5.2 The assessment is carried out at the time of survey of the premises. The Sales Executive will request of the customer information about hazards on the premises as to allow a full assessment of the risk to take place. If these are done from drawing supplied by the client, the assessment will be carried out from the information supplied by the client. The Sales Executive will record that the assessment has been done "site unseen".

4.2.5.3 If customer fails to identify all the hazards on site which affect our employees, and this is discovered and quotation the company reserves the right to discuss with the customer additional precautions required and in agreement with the customer charge for additional cost for the precautions required.

4.2.5.4 If no additional risks or hazards have been identified this is recorded on the Front Sales Order Summary (SOS). However, if additional risk, hazards, or abnormal hazards are

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identified mark EPS yes abnormal hazards. Those risks, hazards or abnormal hazards will need to be assessed. The Sales Executive will carry out the assessment and record finding and attach to SOS. If Sales Executive does not have the time or the hazards are such a more in-depth assessment is required mark SOS No to assessment attached. The Sales Executive then will arrange a further visit to site with another competent person, usually the Installation Manager or Engineering Manager to complete the assessment.

4.2.5.5 If additional control measures are required for the additional risk or abnormal hazard, the cost of these control measures are to be included in the quote.

4.3 MONITORING OF HEALTH AND SAFETY PRACTICES

4.3.1 The Management of Health and Safety at Work Regulations (Current Issue), regulation requires the employer to monitor and review the preventative and protective measures. This is carried out within SECOM Plc by carrying out Safety Audits and Safety Inspections.

4.3.2 The Management of Health and Safety at Work Regulations (Current Issue) regulation 6 requires the employer to provide his employees with health surveillance as appropriate with regard to risks to their health and safety which has been identified by the assessments.

4.3.2.1 This surveillance will be carried out by SECOM Plc when identified by the risks. These shall include Noise, Hand-arm vibration as these elements are involved in some of our work practices.

4.3.2.2 The need for health and safety surveillance will be reviewed during risk assessments, safety audits and safety inspections.

4.3.2.3 The surveillance will include but not limited to self-checking by employee, monitoring concerns of employee ailments, monitoring sickness, technical test if required such as hearing.

4.3.3 Safety Audits

4.3.3.1 The health and safety system audit are carried out as required by the company audit plan. The whole of the system audit will take place at various times during a two-year cycle. Some aspects will be audit quarterly, half yearly once a year or once every two years depending on the section being reviewed.

4.3.3.2 The company safety audit plan details areas to be audited and when.

4.3.3.3 The system audit will cover as minimum the following items.

4.3.3.3.1 Does the company have adequate procedures for identifying specific health and safety requirements which apply to its undertakings.

4.3.3.3.2 Are the procedures followed and are responsibilities set out clearly and understood.

4.3.3.3.3 Does the company's health and safety policy documentation include adequate procedures for identifying hazards which exist at the workplace, and for regularly assessing the risks to employees and others affected by the workplace and

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workplace activities in order to identify the measures needed to avoid their exposure to risks of harm.

4.3.3.3.4 Are adequate risk assessment procedures also set out for hazards of products and/or services supplied by the company in order to identify the measures needed to avoid risks of harm to people such as distributors, customers, end-users, and members of the public.

4.3.3.3.5 Are the procedures in section 4.3.3.3.3 and section 4.3.3.3.4 followed, and are responsibilities set out clearly and understood.

4.3.3.3.6 Does the company have adequate procedures for setting, reviewing, and revising as necessary its health and safety standards for meeting specific health and safety requirements and for meeting its general duties to protect employees and others from risks identified in the company's risk assessments.

4.3.3.3.7 Do the procedures for setting company standards include the identification of measurable targets which can be audited to monitor the level of compliance with company standards.

4.3.3.3.8 Are the procedures in section 4.3.3.3.5 and section 4.3.3.3.6 followed and are responsibilities set out clearly and understood.

4.3.3.3.9 Does the company have adequate procedures for planning, implementing, controlling, monitoring, and reviewing the measures identified in section 4.3.3.3.3 and section 4.3.3.3.4.

4.3.3.3.10 Does the company have adequate procedures for carrying out health and safety audits to check that the procedures in section 4.3.3.3.9 are followed and that the measures in section 4.3.3.3.3 and section 4.3.3.3.4 are effective?

4.3.4 Safety Inspections

4.3.4.1 Safety inspections are carried out by competent persons. Areas covered by safety inspections (walk around's) are carried out by General Managers, Regional Managers, Operations Managers, Department Managers, Regional Sales Manager, Installation Managers, Service Managers, Engineering Managers and Supervisors.

4.3.4.2 The safety inspections are carried out by the above personnel covering their area of operation i.e., Installation Engineers would be inspected by their line supervisor or manager.

4.3.4.3 The safety inspections are carried out in office, customer's premises, or area of operation.

4.3.4.4 The Compliance Department personnel will select at random areas of safety inspections which they will carry out. This may involve auditing areas already inspected by others.

4.3.5 Project Reviews

4.3.5.1 Due to the nature of the majority of our work being short duration contracts it is not reasonably practicable to review the safety record of each contract undertaken. However, this is covered by monitoring incidents, safety audits and safety inspections.

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4.4 TRAINING

- 4.4.1 All employees, including Directors and Executive Management, receive training on Health & Safety.
- 4.4.2 All new staff are given an instruction in Health and Safety matters during Induction Training, delivered by competent person and controlled by the Quality System BS EN ISO 9001 for which we are certificated by our regulatory body NSI.
- 4.4.3 Training needs may be identified by the line managers, by employee request, or by others. This is achieved by regular auditing, annual performance reviews, monitoring of employee's work and consideration of changes within work practices or regulations.
- 4.4.4 All training is recorded and controlled by the Quality System BS EN ISO 9001.
- 4.4.5 Line manager's co-ordinator training needs and arrange the relevant training by the approved method; this could be completed by internal training or external training providers.
- 4.4.6 All General Managers, Regional Managers, Branch Managers, Installation / Service Managers and Project Managers, attend the external training course "Managing Safely" which is approved and validated by the Institute of Occupational Safety & Health.
- 4.4.7 All Supervisors, will receive appropriate training.
- 4.4.8 Sales Executives attend training courses, which deals with hazard spotting, risk assessment and their responsibilities as designers.
- 4.4.9 Updating and refresher training is carried out on an ongoing basis, the common tool used is an E-Learning system and Accident Bulletins as and when necessary. These are normally carried out at the employee's workplace.

4.5 ENGAGEMENT OF NEW EMPLOYEES

- 4.5.1 The engagement of employee's procedure is controlled by our Quality System BS EN ISO 9001, which is audited internally by the company and externally by an assessment body. The procedures that cover this area are Operating Procedure 02 and TWIN 2.1 & 2.2 which includes the requirement of all new starters to the company completing induction training as already covered.

4.6 PROVISION OF INFORMATION

4.6.1 Reference Information

- 4.6.1.1 Up to date reference information is held and is available via the Health and Safety Manager.

4.6.2 Communication of information.

- 4.6.2.1 Health and Safety Manager will develop Toolbox Talks and Accident Bulletins, also will issue to executive management team and relevant offices for delivery to relevant employees.

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4.6.2.2 All information supplied to the company regarding hazards and risks on site will be forwarded to engineering department for onward transmission to the engineers working on that site.

4.6.2.3 Information will be supplied to principal contractor or planning supervisor of the hazards and risks involved in our work when working on their sites. This will be supplied primarily by the Sales Executive working on quotation / tender, this could also be supplied by the project manager of the site, if appointed, at the quotation / tender stage or acting as a support to the Sales Executive.

4.6.2.4 All company locations display the following: - Health and Safety Law poster, the company Health and Safety Policy and valid Employers Liability Insurance Certificate.

4.7 CONSULTATION

4.7.1 We have not been approached by any Trade Union for the setting up of a safety committee; therefore, no safety committee has been set up. However, should the need arise, and a written request received by the Managing Director from a recognised Trade Union, a safety committee would be formed.

4.7.1.1 If a written request came from the employees which are not part of a Trade Union for a safety committee, this would be reviewed by the Executive Management Team and in normal circumstances would be agreed. A request would be forwarded to employees of the company to nominate persons for this position. When people have been selected a committee would be formed, and a record of the meeting will be recorded.

4.7.2 Consultation with employees with no trade union or formal request for safety committee is carried out by local, regional, and national consultative staff meetings with selected/nominated/elected employees present or by submitting changes in practices that affects their health and safety with sufficient information to allow them to evaluate the impact and raised concerns they have about the changes or affects.

4.7.3 Where reasonably practicable consultation will take part at quotation / tender stage between the client and Sales Executive to ensure that the client was aware of the possible hazards we would bring to their site and the hazards our employees would expect to find on our client's premises. If additional safety precautions were required these would be documented and forwarded to those concerned.

4.8 ACCIDENT REPORTING and INVESTIGATION

4.8.1 All incidents are to be reported to Regional Centres or Area Office and are then recorded in the accident book held at each office. Each accident or incident that occurs will have an Incident Form completed and forwarded to the next person on the circulation listing with a copy to the Health and Safety Manager. In the case of serious injury or death of an employee, or sub-contractor working for the Company, the facts shall be reported to the General Manager or Branch Manager without delay. The General Manager will immediately inform the Regional Manager, Operations Director and Health & Safety Manager who will ensure the appropriate action is taken.

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4.8.2 All accidents and incidents will be investigated. The level of investigation will depend on the severity of the accident or incident. All investigations will be recorded; the amount of documentation completed will depend on the severity of the accident or incident.

4.8.3 After the investigation is complete, a review will take place to establish the immediate cause(s) of the accident or incident and to implement short term and long-term corrective action to stop recurrence of the same or similar accidents or incidents. A further review will take place after implementation to review the effectiveness of the corrective action.

4.8.4 All serious accidents and dangerous occurrences that are reportable to the Health and Safety Executive will be reported by the Health and Safety Manager, if not available Operations Director or Regional Manager will report to HSE with copy to Health and Safety Manager.

4.8.5 The company will hold accident/incident records and statistical information which will be used in review and audit process.

4.9 FIRST AID

4.9.1 Kits

4.9.1.1 All first aid kits are periodically checked for correct stock levels and condition.

4.9.2 Office

4.9.2.1 All Regional Centres have first aid boxes provided to cover the number of staff employed at that location and a minimum of one qualified first aider present at all times. It is the Company's objective to have two qualified first aiders at each regional centre to cover holiday and sickness.

4.9.2.2 Physical Division has two qualified first aiders, one of whom is always present.

4.9.2.3 A notice is displayed in all company locations to identify the qualified first aiders and their location.

4.9.3 Engineers

4.9.3.1 First aid kits are provided for each engineer's vehicle. In addition, all temporary site buildings used as office accommodation will be provided with a first aid kit and report forms.

4.9.4 Customers Premises or Site

4.9.4.1 When working on customers premises or sites it is normally agreed that we may have access to their qualified personnel with regard to first aid facilities due to our engineers working on their own.

4.10 WELFARE

4.10.1 All company occupied premises does provide and maintains suitable welfare facilities including providing of adequate ventilation, lighting levels, sufficient workspace, washing facilities this has hot and cold water, reasonable temperatures within the working environment, clean environment, sanitary conveniences, clean areas to eat food, provision for drinking water / refreshment facilities.

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4.10.2 The work undertaken by SECOM Plc is of short duration and normally on occupied premises where the client has already got the welfare facilities in place. It is custom practice for our engineer to use these facilities. If the site was under construction and these welfare facilities are normally provided by the principal contractor. However, if we are the sole contractor and no facilities are available then SECOM Plc would provide our staff with the required welfare facilities for the work being done (this is very rare in our type of work of installing security systems).

4.11 CONTROL OF VISITORS

4.11.1 All visitors attending the company wishing to enter premises unless delivering goods must report to reception.

4.11.2 All delivery personnel will always be accompanied while on the premises.

4.11.3 All visitors staying on premises will be required to be booked in; this is completed at the reception. If not a company employee, the person will be issued with a visits badge to identify them.

4.11.4 All visitors upon leaving the premises will be required to book out and return their identity badge.

4.12 EMERGENCY PROCEDURES

4.12.1 All company locations will: -

4.12.1.1 Display notices giving fire action notices.

4.12.1.2 Display fire exit signs.

4.12.2 All persons present in company locations will in event of emergency evacuation leave the building by the nearest fire exit and assemble at the fire assembly point.

4.12.3 In response to a fire the fire wardens / roll call coordinators will take with them when evacuating the building the register of persons in attendance to allow for a roll call.

4.12.4 No person is allowed to return to the building until advised to by the attending emergency service or if not in attendance by the senior management at the site at the time.

4.12.5 All fire exits are to be kept clear at all times.

4.12.6 If fire alarm system is used at the company location the daily, weekly, and monthly checks should be carried out. The details of the checks required should be located adjacent to the control equipment. Please remember if the system is connected to a signalling system to a Control & Command Centre, they should be informed before the test is made.

4.12.7 All engineers will receive as part of their induction "What to do if an emergency was to occur on the premises or site to which they are working". When the induction is completed, the participants will receive a copy of the documentation.

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4.13 FIRE PREVENTION

4.13.1 The company will carry out a fire risk assessment identifying possible dangers and risks within the locations occupied by them and adjacent premises, these will be recorded. The fire risks are reviewed to eliminate or reduce the risk from fire as far as is reasonably possible. Also, to provide general fire precautions (including fire detection and fire alarms, if appropriate) to deal with any possible risk left.

4.13.2 All company locations will have portable fire extinguishers of the correct type for the risks within those locations and allocated where the risks more likely to occur. These will be periodically maintained by competent persons.

4.14 PRODUCT PURCHASING

4.14.1 All products selected for use on customers premises are assessed for the risk to health and safety in relation to those at risk by installation, maintenance, and the end user of the product.

4.15 SUB-CONTRACTORS

4.15.1 The Company assesses all Sub-Contractors for their competence on Health and Safety matters. Sub-Contractors will complete a questionnaire and supply support documentation, which is reviewed. If the Sub-Contractor is accepted, they will be included on the Approved Sub-Contractors Register. This procedure is controlled by our Quality System BS EN ISO 9001, which is audited internally by the company and externally by an assessment body.

4.16 HAZARDOUS SUBSTANCES

4.16.1 All hazardous substances required for the installation and maintenance process will be assessed for hazards and risk to health, safety, and welfare of the user of the product as well as those working in the area of the product being used.

4.16.2 Product data sheets will be held at each Regional Centre and Area Office to ensure up to date information is available.

4.16.3 Any substance having characteristics or being used in such a way that it could be hazardous to health will only be used as directed. Appropriate precautions will also be taken to reduce the risk to their own health and others around them who may be affected so far as is reasonably practicable. If any accident spillage should occur this shall be cleaned up as quickly and safely as reasonably practicable. Should the spillage be of a serious nature this will be reported to their line manager and recorded on Incident report form and forwarded as directed by the form.

4.17 PERSONAL PROTECTIVE EQUIPMENT (PPE)

4.17.1 Personal Protective Equipment at Work Regulations (Current Issue) covers all personal protective equipment (including clothing affording protection against the weather) which is intended to be worn or held by person at work and which protects them against one or more risks to their health and safety, and any additional or accessory designed to meet that objective. Regulation 3 states that if the following regulations apply: -

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4.17.1.1 The control of Lead at Work Regulations (Current Issue).

4.17.1.2 The Ionising Radiations Regulations (Current Issue).

4.17.1.3 The Control of Asbestos Regulations (Current Issue).

4.17.1.4 The control of noise at Work Regulations (Current Issue).

4.17.1.5 Then regulations 4 and 6 to 12 of the Personal Protective Equipment at Work Regulations (Current Issue), shall not apply, but the above regulations will.

4.17.2 Personal Protective Equipment at Work Regulations (Current Issue), regulation 6 requires an assessment be carried out if the need for PPE has been identified under The Management of Health and Safety at Work Regulations (Current Issue) to ensure that the correct PPE is selected for the particular risks involved and for circumstances of its use.

4.17.2.1 This is carried out by the Health and Safety Manager or by Department Head in conjunction with Health and Safety Manager. The findings are recorded and used for future reviews.

4.17.3 The purchase by the company of PPE is controlled and a preferred list of PPE products is drawn up and used when ordering PPE products.

4.17.4 Each Regional Centre, Area Office and Physical Division holds supplies of PPE or equipment is available on request. Each Engineer and Sales Executive is issued with standard kit of PPE depending on the job function see form H5104 or W0415. The issue of PPE to the individual is recorded on form H5104 or W0415 or W0065.

4.17.5 Personal Protective Equipment at Work Regulations (Current Issue), regulation 9 requires the employer where PPE has been provided, to provide the employee with information, instruction, and training.

4.17.6 The departmental heads carry out inspection procedures on induction of new employees. If PPE is being issued to the employee for the first-time training is also carried out using induction training procedures. If procedures are amended on correct use or inspection of PPE this is also communicated or training given to the employees who use the PPE being amended.

4.17.7 Personal Protective Equipment at Work Regulations (Current Issue) regulation 7 requires that maintenance in an effective state, and in efficient working order. Therefore, periodical inspections are carried out on PPE.

4.17.7.1 PPE will be inspected before issue by the line manager who has arranged issue of the PPE to ensure, it is good state of repair, if not in good state of repair it shall not be issued, it shall be repaired by approved supply or if not economical to repair it shall dispose of in line with manufacturer's instructions.

4.17.7.2 The person who is going to use the PPE will carry out inspection before each use as per manufacturers / company instructions given at the time of issue or during training in correct use and inspection of PPE.

4.17.7.3 Formal documented inspections will take place, and this is be carried out by line managers and recorded on form H5105. If after inspection and a replacement is required,

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these are taken from stock, if no stock available these are ordered (see section 4.17.9) and users are instructed to check before use.

4.17.7.4 Where the PPE is required to have routine maintenance carried out the manufacturer's instructions will be followed.

4.17.8 Personal Protective Equipment at Work Regulations (Current Issue), regulation 8 requires the employer to provide appropriate accommodation for the storage of PPE when not being used.

4.17.8.1 The employee is provided a company vehicle which is to be used to store PPE when not in use.

4.17.9 Personal Protective Equipment at Work Regulations (Current Issue), regulation 10 requires: -

4.17.9.1 Every employee to use any personal protective equipment provided to them in accordance with any instruction or training given, this includes following manufacturer's instructions.

4.17.9.2 PPE should only be used by the employee if trained in the correct use of personal protective equipment.

4.17.9.3 PPE when not being used should be returned to its storage location, this normally for engineers being the company vehicle provided. However, if the PPE is required to be used or worn intermittently, safety glasses for example, need only be returned at the end of the working period.

4.17.9.3.1 Failing to store or look after PPE correctly could result in the user being asked to pay for the replacement of damaged PPE.

4.17.9.4 If PPE should become faulty or require replacement, they will contact their line manager who will arrange for replacement to be issued. If no stock is available, the line manager to arrange for an order to be placed using the relevant order forms.

4.17.9.5 All PPE which requires replacement through fair wear and tear or beyond its useful life will be replaced at the company expense.

4.18 MANUAL HANDLING

4.18.1 Manual Handling Operations Regulations (Current Issue) (as amended), regulation 2 states manual handling operations means any transporting or supporting of a load (including the lifting, putting down, pushing, carrying, or moving thereof) by hand or bodily force.

4.18.2 Manual Handling Operations Regulations (Current Issue) (as amended), regulation 4 requires the employer so far as reasonably practicable, avoid the need for his employees to undertake any manual handling operations at work which involve a risk of being injured. Where it is not reasonably practicable to avoid any manual handling by the employees, the employer will carry out a risk assessment on such manual handling operations. The employer will take appropriate steps to reduce the risk of injury to those employees who carry out manual handling operations to the lowest level reasonably practicable.

4.18.2.1 Risk assessment will be carried out by Health and Safety Manager or Department Heads in-conjunction with the Health and Safety Manager.

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4.18.2.2 The assessment will be recorded and used for later reviews.

4.18.2.3 Where reasonably practicable as identified by the assessments control measures will be introduced, possible measures are: -

4.18.2.3.1 Reducing load weight.

4.18.2.3.2 Mechanical aids.

4.18.2.3.3 Two-person lifts.

4.18.2.3.4 Training of kinetic lifting techniques etc.

4.18.2.3.5 These are some of the controlled measures, details of the correct measures to be taken when carrying out manual handling operations are detailed within company safety procedures.

4.19 DISPLAY SCREEN EQUIPMENT

4.19.1 The company will determine the persons who are classed as display screen users. A Risk Assessment will then be carried out on each person and workstation classed as display screen users; this information will be documented. Risk Assessment will involve discussions with the user but not limited to: - the amount of display screen work including duration, workloads, alternative work and breaks of display work, also cover display screen equipment the furniture, the working environment, and the worker etc.

4.19.2 On completion of Risk Assessments, the users will be advised of the findings and should a foreseeable risk of injury be identified, and if reasonably practicable, elimination will be implemented. However, due to nature of display screen work, the possible hazards cannot always be reasonably eliminated therefore control measures will be introduced. Possible control measures will include but not limited to: - replacing non-complying workstation equipment or poorly suited equipment, position workstation and equipment to suit the individual needs, adjust lighting levels, change work patterns to give breaks in routine etc.

4.19.3 The company will give sufficient information, instruction, and training as is necessary to ensure the health and safety of users of display screen equipment.

4.19.4 The company will pay for eyesight tests every 2 years (or 1 year if the optician has advised that an annual test is needed) providing the employees are classed specifically as a display screen equipment user and has requested for such test and the test is carried out by a recognised optician. Should the test results show glasses are required for display screen equipment use specifically, the company will contribute up to a limit set by them from time to time, the standard cost of frames and lenses providing the cost have been agreed with the company before purchase. If the person requires purchasing more expensive model of glasses of their own choosing the company will still contribute the standard costs. To reiterate this is only for glasses specifically prescribed for VDU use.

4.19.5 The employee is responsible for the safe keeping of these glasses, if they become damaged through neglect the employee could be asked to pay for the replacement of the glasses. However, should their visual requirements change, provided section 4.19.4 is followed the company will meet the costs in section 4.19.4.

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4.20 ELECTRICAL

4.20.1 All locations from which the company operates will have all fixed electrical installations tested and certificated by competent persons. Any non-conformity found will be documented and rectified. Re-tests will take place every 5 years or sooner if deemed necessary.

4.20.2 All portable appliances whether used within the office, Physical Division or at our customers premises will be formally inspected and electrically tested for conformity as required by the quality Operating Procedure OP5 Inspection, Measuring and Test Equipment.

4.20.3 All engineers using any portable electrical appliance or extension cable will carry out a visual inspection to ensure it is safe to use, if found to be defective will report this to their line manager and will not use until the defect has been repaired by a competent person.

4.20.4 Electrical portable appliances used on construction sites will be 110-volt AC centre tapped earth type, or lower voltage i.e. 24-volt DC.

4.20.5 All trailing leads from electrical portable appliances must be kept to a minimum and clear of walkways. If trailing leads have to be within walkways these should be laid in such a way not to cause risk to other persons on the site. If a foreseeable risk is still present, then if reasonably practicable signs or segregation should be placed to eliminate or reduce the risk.

4.20.6 All electrical installation work is to be carried out by competent persons and will comply with Electricity at Work Regulations, the current edition of the Institute of Electrical Engineers Wiring Regulations and relevant British Standard Code of Practice.

4.20.7 Work on, or adjacent to, live circuits or equipment shall not be carried out, unless it is unreasonable in all the circumstances for it to be made dead.

4.20.8 Only competent person shall carry out electrical isolations, before any isolation is carried out the competent shall ensure consideration is given to the effects of the electrical isolation will have on our employees, clients, other contractors, and the public prior to the isolation. Electrical isolation shall follow the isolation procedure.

4.20.9 Equipment shall be isolated a "lock off" procedure will be adopted to stop accidental switching back before completion of work.

4.20.10 Working near live overhead power lines should be avoided, if reasonably practicable; these should be isolated before work commences. If not, a safe system of work should be invoked. Great care should also be taken when carrying metal ladders beneath overhead power lines.

4.21 WORKING IN OCCUPIED PREMISES OR GENERAL PUBLIC AREA'S

4.21.1 Working practices will consider the hazards work may cause when working in occupied premises or areas where the general public has access to.

4.21.2 When working in these areas all operatives will ensure that any risks to the other persons are assessed and where reasonably practicable precautions shall be taken to eliminate or reduce the risks. The following methods are ways of reducing the risks to the occupied or public areas, providing signs, partitioning off the area, working when the areas are not occupied, or public have access to or other reasonable means.

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4.22 ASBESTOS

4.22.1 The company is not licensed to carry out work on asbestos as laid down by the Control of Asbestos Regulations (Current Issue) and if such work has to be carried out, this work would be done by qualified licensed asbestos workers.

4.22.2 All engineering staff will receive as part of the induction to the company, information, and asbestos awareness training and what to do if asbestos material is suspected of being present in the area the engineer is to work. Asbestos awareness refresher training is carried out annually.

4.22.3 No company employees, contractors or Sub-Contractors will knowingly work with asbestos products; asbestos insulation material or equipment containing such materials unless qualified to do so. All such work with asbestos will be carefully assessed by the Installation / Service Manager / Engineering Managers in consultation with Regional Operations Manager and Health and Safety Manager or appointed external safety advisers in compliance with the Control of Asbestos Regulations (Current Issue).

4.22.4 The most likely asbestos containing product to be encountered is asbestos insulation products and ceiling tiles. The detailed procedures for the handling of these products are available from the Health and Safety Manager or external safety advisers. The precautions to be taken are a cautionary policy and the standards applied are such as to ensure, so far as is reasonably practicable, that the exposure is minimal. It is therefore considered that the exposure of the Company's employees and contractors / Sub-Contractors will not be significant.

4.23 DUST

4.23.1 Dust movement can be caused by the fan of a drill or removing of ceiling tiles, working in roof voids, therefore engineers are provided with the appropriate PPE / RPE.

4.24 NOISE

4.24.1 Assessments will be carried out by competent persons on all noise related activities, to identify the level of exposure to employees and others within the area of work. Methods of reducing the noise level will be investigated and where reasonably practicable noise reduction will be implemented.

4.24.2 If the exposure reaches first action level of daily personal noise exposure of 80db (A) employees will be informed and PPE issued. If second action level of daily personal noise exposure of 85db (A) employees will be informed and distances specified in which hearing protection should be worn. If peak sound pressure action level is reached of 140db employees will be informed that these operations will need PPE to be worn at all time during that operation.

4.24.3 The common exposure to noise of the company employees is drilling hard surfaces and testing of sounders when within 1 metre of the sounding device. All engineers are to wear ear protection when these conditions are present. Currently in normal conditions, other persons working in the area of the work being done, are outside the action levels.

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4.25 WORK EQUIPMENT

4.25.1 The Provision and Use of Work Equipment Regulations (Current Issue) primary objective is to ensure the provision of safe work equipment and its safe use. Work equipment should not give rise to risks to health and safety, irrespective of its age or place of origin.

4.25.1.1 Work equipment is any equipment used by any of the employees to carry out their duties, this includes equipment (employees own equipment or loaned) not owned by SECOM Plc.

4.25.2 Work equipment is selected by the task and environment to which it is to be used. The equipment must also comply with the current legislation implementing the relevant EC Directive. Where appropriate the equipment shall be checked for the CE mark. Risk assessment will be carried out on the use of work equipment in accordance with The Management of Health and Safety at Work Regulations (Current Issue).

4.25.3 The selection of work equipment is carried out by the Health and Safety Manager or Department Managers in-conjunction with Operations Director \ Logistics Officer \ Health and Safety Manager or from the already assessed and selected preferred work equipment listing.

4.25.4 The person or persons selecting the work equipment shall check that the equipment meets the requirements laid down by the Provision and Use of Work Equipment Regulations (PUWER) (Current Issue) and another relevant legislation if unsure that the work equipment meets the above criteria contact the Health and Safety Manager.

4.25.5 Assessments will be carried out on all work equipment where there is a foreseeable risk of injury to the operative. This is to be carried by the Health and Safety Manager or Department Managers in-conjunction with Operations Director \ Logistics Officer \ Health and Safety Manager. On completion of risk assessment should a risk of injury be foreseeable, possible ways of eliminating the risks will be evaluated and if reasonably practicable the elimination will be implemented. However, if not reasonably practicable control measures will be introduced.

4.25.6 All persons who going to use the work equipment must be provided with adequate training in the safe use of the work equipment and any risk which such use may entail and precautions to be taken.

4.25.7 The department heads are to ensure that all persons under their control have received the adequate training before they are allowed to use the work equipment. If training is required, you are contact training provider identified within the approved supplier register W6960 or if not listed or specified contact the Health and Safety Manager.

4.25.8 All work equipment is to be maintained in accordance with manufacturer's instructions. No equipment shall be used if it's not in good state of repair.

4.25.9 All line managers are responsible for periodic checks of work equipment used in the workplace. If the checks are required to be undertaken by specialist line managers are responsible for ensuring the checks are carried out and if require logged in the equipment logbook.

4.25.9.1 If the work equipment is classed as a portable electrical appliance this will carried out as required by BS EN ISO 9001 Quality Work Instruction 5.2

4.25.9.2 If the work equipment is classed as access equipment (ladders, steps, motorised platforms, etc) this will carry out as required by BS EN ISO 9001 Quality Work Instruction 5.3

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4.25.9.3 All operatives using work equipment shall carry out the checks required by the manufacturers / company instructions before use of such equipment. If you are in any doubt about the correct checks to be carried out, you are to contact your line manager.

4.26 BURIED SERVICES

4.26.1 Excavation of Ground to Lay Cables

4.26.1.1 Before any excavation is undertaken by employees or any contractor/Sub-Contractor working for the Company, plans must be obtained of the buried services. In every case cable locator assisted by hand digging must be used to locate the services. They should then be clearly marked by posts or similar. In any case of doubt the relevant Utility must be contacted.

4.26.2 Drilling Walls

4.26.2.1 Before any drilling work is undertaken engineers must check area for evidence of buried services within the wall, floor or ceiling for electric cables, gas pipes, water pipes and telephone cables etc.

4.27 WORKING AT HEIGHT

4.27.1 All work activities that involve work at height that need to be undertaken will be eliminated wherever it is reasonably practicable to do so. Risks associated with those activities where work at height cannot be eliminated will be evaluated and steps taken to control them.

4.27.2 All operatives who have to undertake work at height are trained and competent to do so.

4.27.3 All operatives will comply with all instruction and training that are provided in work at height activities and take appropriate steps to ensure their own health and safety is not put at risk when working at height. To report any perceived shortcoming in the arrangements for managing the risks associated with working at height.

4.27.4 Suitable information and training will be provided to persons who are required to undertake activities that involve work at height. Refresher training will also be given at reasonable intervals.

4.27.5 All work at height is undertaken to Working at Height Regulations (Current Issue).

4.28 ROOFWORK

4.28.1 Roof work is a high-risk activity; therefore, any roof work must be pre-planned and foreseeable hazards must be identified and assessed so that a safe system of work is established. No engineers will carry out roof work unless they are competent to do so. This is normally done through training. No trainees are to carry out roof work unless this has been agreed in writing for each occasion with line managers, Operations Director and Health and Safety Manager which will include full details of risks and safe systems of work.

4.28.2 If roof work is to be carried out then there must be safe means of access. Common means are by scaffolding, mobile towers, ladders, or internal access. If roof work is carried out within 4 metres of the roof edge on flat roofs and all other roofs, protection is required to ensure the person

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cannot fall over the edge. This can be done with edge protection or for short duration work a safety harness to be worn (belt harness are not permitted to be used) and anchored to a secure structure or anchor point via lanyard or fall arrest device. On fragile or sloping roof purpose made crawling boards or roof ladders must be used. Narrow walkways on fragile roofs must be boarded each side or fitted with safety line to prevent falling though fragile roof. All openings in roofs are to be covered over or guard rails positioned around opening to ensure no person can fall though opening. When working on roof, precautions must be in place to ensure that no objects can fall onto persons below; this can be by barriers at ground level or sheeting / boarding to stop objects reaching the persons below. If using tools these shall have safety straps attached.

4.29 CONFINED SPACES

4.29.1 Confined spaces mean they have limited access and inadequate ventilation which could be potentially dangerous places to work. They could trap hazardous concentrations of toxic or flammable gases or vapour and lead to oxygen deficient areas within. Confined spaces can be tanks, ducts boreholes, silos, manholes, furnaces, pipelines, sewers, and underground chambers. If in doubt whether or not a particular area is classed as confined space, consult the line manager, otherwise treat as confined space. No employee or contractor / Sub-Contractor are to undertake this kind of work unless they are suitably qualified.

4.29.2 Before any work can be carried out in confined spaces the work must be pre-planned and foreseeable hazards must be identified and assessed by a competent person so that a safe system of work is established. Safe system of work to include safety equipment required, procedure to be followed, any lock-offs required, test must be carried out prior to entry and continuous monitoring at the workplace, maintain contact between engineer and attendant in free air who is trained to carry out emergency procedures. Once safe system of work has been agreed a permit to work must be implemented.

4.30 LADDERS and STEPS

4.30.1 Operatives using ladders or steps can use them if suitably trained in the correct use of ladders or steps. Before use of the ladders or steps they should be inspected by the user to ensure fit for purpose, if damaged they are not to be used and line manager is informed.

4.30.2 Operatives must ensure that the ladders are placed at correct angle of one out to four up which is a 75-degree angle. Where reasonably practicable the ladder should be anchored at the bottom or top, ladder aids used or footed by another person to avoid ladder sliding outwards at the base and side wards at the top. On uneven ground never block up ladder to get level bury longer leg or use leg extender. Never use a makeshift ladder or a ladder that is too short or overreach. Beware of overhead power lines you do not need to touch to receive an electric shock. Beware of weather conditions such as ice, rain, and wind as these can all affect your safety when working off ladders or steps outside.

4.30.3 All ladders and steps will be periodically checked for condition and continued suitability.

4.30.4 Fixed ladders to scaffolding must always be tied off.

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4.30.5 Users of fixed vertical ladders, which are always attached to the building, should be aware of any corrosion of rungs, straps, and fixings. Do not use such ladders whether internal or external where safety hoops are not fitted above 2.4 metres.

4.31 SCAFFOLDING

4.31.1 The company does not erect fixed scaffolding; however, we will use fixed scaffolding if available on site and erected.

4.31.2 Fixed scaffolding must not be used until the scaffolding is complete and has passed inspection. Always use correct means of access provided i.e., ladders and walkways never climb the scaffolding.

4.32 MOBILE TOWERS

4.32.1 Mobile towers are to be erected by competent persons and inspected before use. They should be erected on firm ground and, unless the foundation is concrete or other solid material, the load should be spread by timber sole plates. The base to height ratio should always be observed and if used externally weather conditions would need to be considered. There must be a safe access to the platform and never a ladder lent against the tower. Always ensure guardrails and toe boards are fitted where required. Never move the tower with persons on board.

4.33 POWER OPERATED MOBILE WORK PLATFORMS

4.33.1 Power operated mobile work platforms are only used by trained and authorised users. They will carry out daily inspections before use as specified by the manufacturer. If after inspection, the platform is deemed to be unsafe, the platform will not be used. Further inspections will be carried out by authorised persons as specified by the manufacturer, which will be documented. Persons under the age of 18 years of age are not permitted to use power operated mobile work platforms.

4.33.2 When the power operated mobile work platform is used, checks are carried before lifts takes place, these will include but not limited to: - weather conditions when used externally, outriggers placement on firm base and sole plates used where required, the platform is level, the safe working load is not exceeded, platform is properly guarded, and the operation is not taking place near live overhead powers lines. When the power operated mobile work platform is left unattended it shall be immobilised to ensure it is not used by unauthorised persons.

4.34 OCCUPATIONAL HEALTH

4.34.1 The work of this organisation involves the (limited) exposure of employees to some health and safety hazards. Under the Management of Health and Safety at Work Regulations (MHSWR) (Current Issue) and the Control of Substances Hazardous to Health Regulations (COSHH) (Current Issue), health surveillance is required in circumstances where a significant occupational risk to health remains despite control measures. The primary purpose of health surveillance is the early detection of adverse health risks associated with work activity. It allows staff at increased risk to be identified and additional precautions to be taken as necessary. It is also a means of checking the effectiveness of existing control measures.

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4.35 MENTAL HEALTH

4.35.1 This policy outlines the approach of the company towards supporting employees who have mental health related issues.

The company recognises that mental health issues are common in modern society and affect many employees and managers in workplaces. It also recognises that people with mental health issues make valuable contributions to the success of any organisation and that providing them with adequate support not only complies with the law but supports their ongoing health and employment.

In particular the organisation recognises its duties under the Equality Act 2010 to prevent discrimination and to make “reasonable adjustments” for employees with disabilities which remove barriers to their employment. The organisation recognises that disability is defined in the Act as a physical or mental impairment that has a substantial and long-term adverse effect on the individual to carry out normal, day-to-day activities.

4.36 LONE WORKING

4.36.1 The company will ensure, so far as is reasonably practicable, that employees and self-employed contractors who are required to work alone or unsupervised are protected from risks to their health and safety. Measures will also be adopted to protect anyone else affected by solitary working. Solitary working exposes employees and others to certain hazards. The objective from this organisation is either to entirely remove the risks from these hazards or, where complete elimination is not possible, to reduce them to an acceptable level. The person responsible for the implementation of the policy and the co-operation of management and employees is essential to its success.

4.36.2 Assessments of the risks of working alone carried out under the Management of Health and Safety at Work Regulations (MHSWR) (Current Issue) will confirm whether the work can actually be done safely by one unaccompanied person. This will include the identification of hazards from, for example, means of access and/or egress, plant, machinery, goods, substances, and environment, etc. Particular consideration will be given to:

- 4.36.2.1 The remoteness or isolation of workplaces.
- 4.36.2.2 Any problems of communication.
- 4.36.2.3 The possibility of violence or criminal activity from other persons.
- 4.36.2.4 The nature of injury or damage to health and anticipated “worst case” scenario.

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