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HEALTH and SAFETY POLICY MANUAL

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Forward

The aim of Merco Facilities Services Limited is to manage health and safety with the same degree of expertise and to the same standards as other core business activities, and to effectively control risks and prevent harm to people. The Company acknowledges the guidance on good practice in health and safety management contained in HSG65.

To summarise, our objectives with reference to HSG65 are to have -

- An effective health and safety policy which sets a clear direction for the organisation to follow.
- An effective management structure and arrangements in place for delivering the policy.
- A planned and systematic approach to implementing the health and safety policy through an effective health and safety management system.
- Performance analysed to reveal when and where improvement is needed.
- Learnt from all relevant experiences and apply the lessons.

The aims of the Company are to manage health and safety with the same degree of expertise and to the same standards as other core business activities.

We will effectively control risks and prevent harm to people by adopting the plan, do, check, act approach.

Simon Dresdner
Managing Director

Introduction

Merco Facilities Services Limited provides premier cleaning services to commercial and industrial clients. The Company is committed to providing the highest quality of product, service and performance.

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The Company's commitment to health and safety is disseminated to all levels of personnel within the Company. In complying with the Health and Safety at Work etc Act 1974 all employees will have read and be familiar with the contents of this Health and Safety Policy Manual. They are expected to effect the Policy by performing work safely, correctly and without risk to themselves or others who may be affected by their acts or omissions.

The aim of this Health and Safety Policy Manual is to provide full, accurate and up-to-date safety information to all Company employees. In order to achieve this purpose, copies of the manual will be available for reference to all personnel. It is hoped that this manual will provide sufficient information to enable employees to take up their duties in a safe manner and be fully aware of all safety aspects and procedures. It is essential that employees make use of the information included in the manual. As with any document of this size, improvements can always be made and therefore the Company warmly welcomes any suggestions of how this Health and Safety Policy Manual may be improved. Suggestions should ideally be submitted in writing, or if appropriate, verbally to Neil Fagleman.

All employees have, or will on appointment, undergo suitable instruction and education to facilitate and promote a good working knowledge and understanding of health and safety matters. If any employee is unable to understand the requirements laid down within this manual he or she, should seek assistance from his or her supervisor.

Revision and Amendments

This manual will be reviewed where appropriate to ensure that it contains accurate and up-to-date information. Amendments will be made when necessary in order to take in to account and portray current relevant legal requirements, codes of practice and any Company safety standards, procedures and rules. Management have the responsibility to ensure that this Health and Safety Policy Manual and the Company's General Statement of Policy are updated as required, bringing to the attention of all employees under their control, the revisions and amendments made.

General Statement of Policy

Merco Facilities Services Limited (the Company) recognises and accepts its responsibilities as an employer to provide safe and healthy working conditions for all its employees. This policy statement reflects the Company's commitment towards the health, safety and welfare of all employees. The Company will take all necessary steps, so far as is reasonably practicable, to meet these responsibilities. To this end, the Company will integrate their health and safety arrangements into the management system for all other aspects of their activities.

The Company is responsible for:

- A safe place of work, with safe means of access and egress.
- A safe working environment.
- Safe plant and systems of work.
- The provision of any necessary information, instruction, training and supervision.
- The safe use, handling, storage and transport of articles and substances.

The promotion of health and safety at work is regarded as a mutually beneficial objective for management and employees at all levels. Employees have a legal responsibility to co-operate with the Company in fulfilling its own obligations, take reasonable care of themselves and others, and co-operate in the implementation of this policy as far as is practicable.

The policy will be kept up to date, particularly as the business changes in nature and size. To ensure this, the policy and the way in which it has operated will be reviewed from time to time, and employees advised of any changes.

Simon Dresdner

Managing Director

Date: 30th January 2019

Individual Responsibilities

Without prejudice to the more particular nature of individual duties, the following are to be taken as general responsibilities.

MANAGING DIRECTOR

The Managing Director Simon Dresdner accepts ultimate responsibility for the implementation of this Health and Safety Policy, for compliance with the Health and Safety at Work etc Act 1974 and regulations made there under and for any policy decisions, which may affect the health, safety and welfare of employees of the Company. He has the authority to ensure the implementation of the Safety Policy in its entirety and will ensure that an authorized and effective Company policy for occupational health and safety is maintained, and that the means for implementing the Policy are available within the Company.

OPERATIONS MANAGER

The Operations Manager Neil Fagleman reports directly to Simon Dresdner the Managing Director. He will assume responsibility for the implementation of this policy on activities or projects under his control.

AREA MANAGERS

Area Managers report directly to Operations Manager Neil Fagleman. They will ensure that the health, safety and welfare of individuals under their control is not compromised for the Company's commercial gain.

CLEANING SUPERVISORS

Cleaning Supervisors report directly to their relevant Area Manager and will assume responsibility for the implementation of this policy on activities under their control, fulfilling their duty to provide supervision.

CLEANERS

Cleaners are to ensure that they are conversant with this Health and Safety Policy Manual and that they work at all times in a safe manner. They have a responsibility for those they work with and for third parties who may be affected by what they do, or do not do, for property and equipment, as well as for themselves.

ADMINISTRATIVE STAFF

Administrative staff have amongst other responsibilities to ensure the safety of visitors to the Head Office. All administrative staff shall consult with Neil Fagleman regarding any health and safety concerns they may have.

HEALTH SAFETY AND ENVIRONMENTAL ISSUES

All staff will seek advice on the above from their immediate line manager as detailed in the Health and Safety Line of Responsibility organogram on the following page. The Company has access to competent external health and safety advice as and when required.

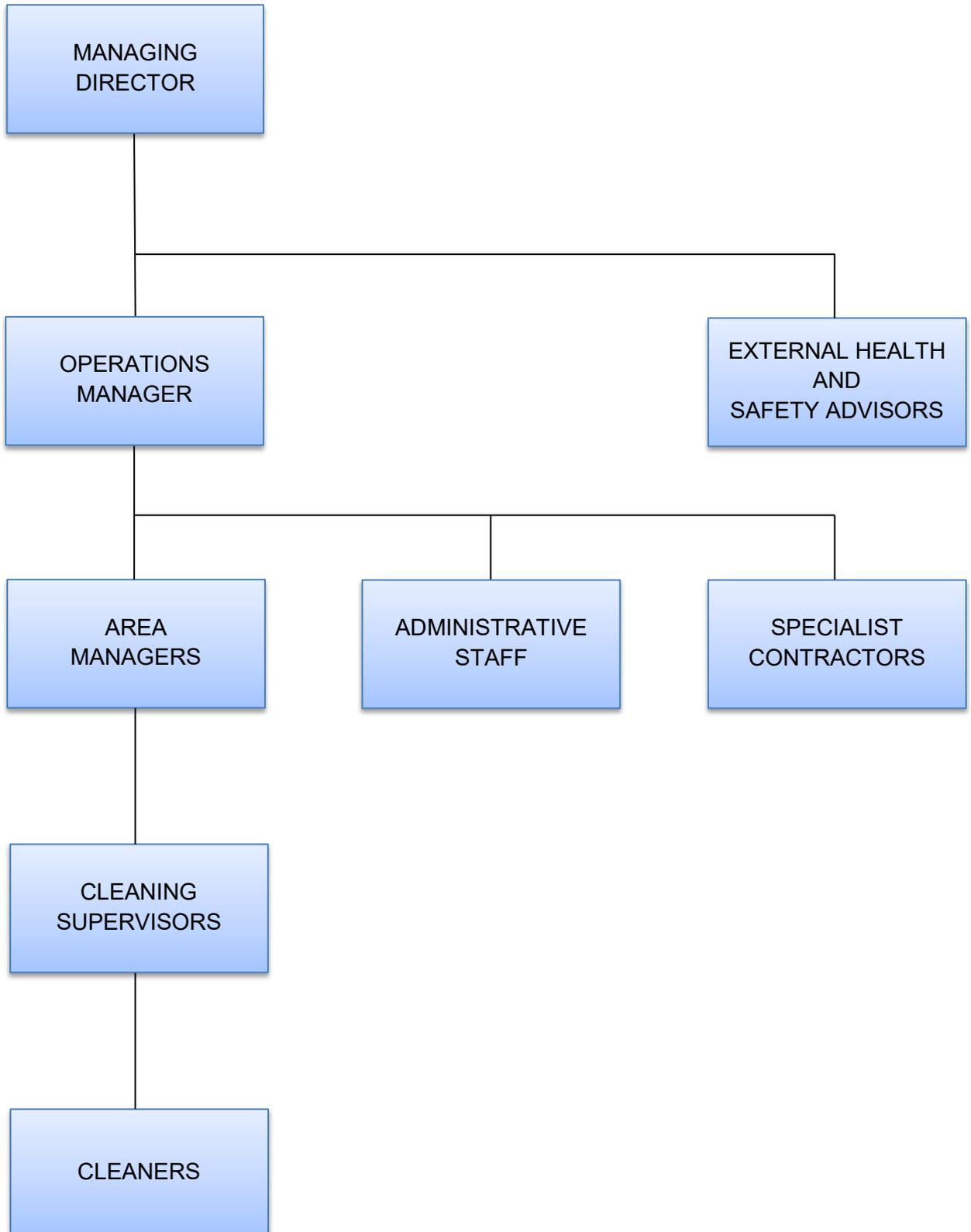
Details regarding health and safety matters are contained in this Company Health and Safety Policy Manual, for the information of all employed persons. All employees will sign to confirm they have understood the Company Health and Safety Policy statement, and the organisation and the arrangements in place for managing occupational health and safety.

It is a fundamental of the Company Policy to encourage employees to develop measures which improve their health and safety at work. To this end, the Company will ensure that all employees receive the appropriate and comprehensive training to enable them to achieve this. All employees will have attended a Health and Safety Induction and will sign to confirm they have understood the organisation and the arrangements in place for managing occupational health and safety in Merco Facilities Services Limited.

All employees and are required to co-operate in implementing the requirements of all health and safety legislation, and related approved code of practice, guidance and best practice. They must refrain from doing anything, which constitutes a danger to themselves and/or others.

It is an important part of this policy that any of the persons named within it, who in the course of their duties discover contravention of the policy, take appropriate action within the scope of their duties and at the earliest practicable opportunity to rectify the contravention.

HEALTH and SAFETY LINE OF RESPONSIBILITY



Organisation and Responsibilities

Managing Director

Simon Dresdner will give full support to all those who endeavour to implement and carry out the Company's policy. He will promote within the Company an understanding that injury prevention and damage control are an integral part of business and operational efficiency, and will ensure that health, safety and environmental issues receive the appropriate level of resources to enable compliance with the relevant legislation.

The main responsibilities of Simon are to ensure:

- he sets a personal example;
- the necessary appointments are made in the Company to fulfil the requirements of this Health and Safety Policy Manual and that adequate resources are available to ensure compliance with Health and Safety standards;
- professional safety advice is available as required;
- the Safety Policy requirements are adequately monitored, and effective action taken to correct deficiencies found;
- the Company Health and Safety Policy Manual is updated and revised, in accordance with new legislation or guidance, and communicated to all employees;
- that all employees have attended the Company Health and Safety induction;
- that all statutory requirements with regards to the testing and inspection of workplace equipment is undertaken;
- safety inspections and audits are undertaken, their findings analysed and any necessary actions taken to make improvements to the company's management of SHE issues;
- Company Safety alerts are issued where necessary;
- that all incidents involving injury, near misses and/or plant damage are recorded, investigated within 24 hours, and any corrective measures necessary are implemented;
- the HSE are informed of accidents and incidents that are reportable under RIDDOR and where appropriate insurance providers are informed.

Operations Manager

Neil Fagleman will assume responsibility for the implementation of this policy on activities/projects under his control and will give his full support to all those who endeavour to implement and carry out the Company's policy.

The main responsibilities of Neil are to ensure:

- he sets a personal example, and discusses health, safety and environmental matters, with all persons under his control. Where appropriate he will consult and discuss the issue with Simon Dresdner before responding;
- he arranges for the inspection and maintenance of equipment as per the manufacturers guidelines and the relevant statutory duty;
- records of inspection and maintenance are maintained, and all site registers, records and reports relating to Health and Safety, are properly filed;
- that safe systems of work are devised for all planned works;
- specialist contractors are assessed with regards to their competency prior to them undertaking work on the Company's behalf;
- that contractors systems of work are assessed and their performance on site is monitored to ensure they are following agreed methods of working and the identified control measures from task specific Risk Assessments are being adhered to;
- he manages health, safety and environmental matters at the Head Office;
- assessments relating to office based tasks and equipment are undertaken, recorded and reviewed in compliance with the relevant regulations.
- that all incidents involving injury, near misses and/or plant damage are investigated within 24 hours, and any corrective measures necessary are implemented.

Area Managers

Area Managers will ensure that the health, safety and welfare of individuals under their control is not compromised for the Company's commercial gain.

The main responsibilities of the Company's Area Managers are to ensure:

- that all cleaning staff under their control have been provided with a Safety, Health and Environmental (SHE) induction prior to commencing work;
- clear and precise instruction is given and being followed in relation to methods of working;
- they monitor cleaning staff to ensure that the identified control measures from task specific Risk and COSHH Assessments are being adhered to;
- site specific hazards are assessed, recorded and suitable and sufficient control measures are implemented;

- defective equipment is repaired or replaced;
- all accidents, incidents and near misses are recorded and in addition reported to Neil Fagleman.

Cleaning Supervisors

Cleaning Supervisors report directly to their relevant Area Manager.

The main responsibilities of Supervisors are to ensure:

- their own safety, and that of others who could be affected by their acts or omissions;
- that clear and precise instruction is given in relation to health and safety;
- the identified control measures from task specific Risk and COSHH Assessments are being adhered to;
- defective equipment is quarantined to prevent its use, labelled as such and they notify their Area Manager as soon as is practicable;
- that all site registers, records and reports relating to health and safety are properly filed and readily available;
- that all accidents, incidents and near misses are recorded, and reported to their Area Manager.

Cleaners

Cleaners will report directly to their supervisor regarding health, safety, and environmental matters. When this is not possible they will liaise directly with their Area Manager.

The main responsibilities of cleaners are to ensure:

- their own safety, and that of others who could be affected by their acts or omissions;
- all site and safety rules are observed and they only operate equipment or undertake tasks for which they have been authorised to do so;
- defined methods of working are being followed and the control measures for the associated risk and where applicable COSHH assessments are being adhered to;
- if there is any doubt that the hazards have not been eliminated or risks reduced so far as is reasonably practicable, then they are to consult with their supervisor;
- they visually inspect equipment prior to its use for any obvious faults or defects. They shall not use equipment they know to be faulty. They shall notify their Supervisor of any defective equipment as soon as is practicable and it shall be quarantined until such time as it can be repaired or replaced;
- that if within their authority to do so, promptly rectify all defects in the work place and/or equipment in use, and if not within their authority to promptly report such defects to their supervisor;

- that all near misses, incidents or accidents, are reported as soon as practicable to their supervisor or in their absence their Area Manager. They have a duty to make areas safe, unless it would endanger themselves, and leave the area undisturbed until an investigation is undertaken.

Administrative Staff

Administrative staff will report directly to Neil Fagleman regarding Health and Safety and Environmental matters. The main responsibilities of Administrative Staff are to ensure that they:

- do not cause injury or accidents through careless actions such as leaving drawers or filing cabinets open;
- do not attempt to repair or undertake maintenance on office machinery or equipment unless they have been authorised to do so;
- report faulty lighting, floor coverings, stair treads, slippery surfaces, damaged cables, plugs or other faulty electrical accessories;
- keep floor and passageways clear of rubbish and waste, or use any floor area for the storage of work files etc.

All Employees

In addition to specific responsibilities of their position, all employees have a duty to co-operate with Merco Facilities Services Limited, as their employer, to enable the Company to fulfil its legal obligation. It is therefore a condition of employment that all employees should observe the following:

- Familiarise themselves with, and always conform to, the legal Company Health and Safety Policy, observing safety rules and safe working practices.
- Take reasonable care for the Health and Safety of themselves and of other persons who may be affected by their acts or omissions.
- When a host, accompany visitors at all times whilst on the premises, and especially in an emergency such as an evacuation of the premises;
- Not to intentionally or recklessly interfere with, or misuse anything provided in the interests of Health and Safety. Be aware that wilful disregard for safety will result in disciplinary action.
- Always use the correct tools and equipment for the task. Avoid taking short cuts and improvising, which cause unnecessary risks. Visually inspect any equipment before use; reporting any defect to supervision as soon as practicable. Point out any unsafe acts or conditions. Take an active interest in health and safety and direct suggestions to improve health and safety to their immediate supervisor.
- Report all incidents, near misses and accidents, whether persons are injured or not. Co-operate with supervision and management in preventing health risks to themselves, colleagues, visitors and members of the public.
- When attending site or clients premises employees shall follow the site rules and procedures at that location.
- It shall be a disciplinary offence to attend the workplace when under the influence of alcohol or drugs that impair judgement and capabilities. If an employee is taking prescription or other legal 'over the counter' type drugs that impair judgement and capabilities he/she must inform Neil Fagleman. He may place limitations on the work that an employee can undertake.
- Employees can refuse to undertake a duty on the grounds that it may be hazardous to either themselves or others. They will not face a detriment for asserting this right.
- Temporary workers will be treated in the same way as directly employed members as far as health, safety and welfare matters are concerned.

It is the duty of all employees to comply with the above. Failure to do so may result in disciplinary action being taken.

Regulations and Arrangements (Specifics of the Company)

Health Safety and Environmental Induction

All new employees, regardless of their position in the Company will undergo a Health, Safety and Environmental induction on joining the Company. Area Managers will undertake the induction for Cleaning staff under their control. Neil Fagleman will undertake the induction for all other new employees.

The Health, Safety and Environmental induction is in a written format to ensure clarity, consistency and uniformity. All employees will receive suitable and sufficient information, instruction and training relative to their position in the company. In the event of any new employee being under the age of 18 years then assessments will be undertaken for any planned work activities they are to undertake or participate in. They shall be informed of all limitations regarding the operation of equipment and tasks that apply to their role and at that location.

The company will ensure that prior to setting Cleaners to work at client's premises they have provided them with adequate information and instruction regarding the health and safety issues relating to that work and location.

Consultation

The Company understands its duties requiring employers to consult with their employees on health, safety and environmental matters. Consultation is undertaken via staff meetings and as part of the Area Managers daily management function. The Company will consult with our employees in good time, on the drawing up and maintaining of arrangements for the effective promotion, development and monitoring of measures to ensure their health and safety while at work. Individual employees will be consulted before they are given any new or additional health and safety responsibilities.

Communication

The management of Merco Facilities Services Limited will communicate to their employees their commitment to health and safety and to ensure that employees are familiar with the contents of this Company Health and Safety Manual. Merco Facilities Services Limited communicates orally, in writing, in the form of directives and this policy statement and by example. Although the company does not employ those with little or no understanding of English, its policy is to have documentation and signage translated where appropriate.

Co-operation and Care

If we are to build and maintain a healthy and safe working environment, co-operation between workers at all levels is essential. All employees are expected to co-operate with management and to accept their duties under this policy. Disciplinary action may be taken against any employee who violates safety rules or who fails to perform his or her duties under this policy. Employees have a duty to take all reasonable steps to preserve and protect the health and safety of themselves and all other people affected by the operations of the Company.

Safety Training

Safety training is regarded as an indispensable ingredient of an effective health and safety programme. It is essential that every worker in the organisation is trained to perform his or her job effectively and safely. It is the opinion of the management of Merco Facilities Services Limited that if a job is not done safely then it is not done effectively. Appropriate and proportionate training, information and instruction shall be given to all employees. They will be trained in safe working practices and the procedures prior to being allocated any new role. Simon Dresdner will be assisted by Neil Fagleman in identifying and organising health and safety training for employees. Training sessions will be held as and when necessary and the Training records shall be maintained by Neil Fagleman.

First Aid

The Company assesses the level of first aid provision required at the Head Office and for site projects. The aim of first aid is to Preserve Life, Promote Recovery and Prevent the condition worsening. It does not include the giving of tablets or medicines to treat illness and they should not be kept in first aid containers. First aid boxes shall contain only those items, which a first aider has been trained to use.

Health Surveillance

The Company complies with its duties under Regulation 6 of the Management of Health and Safety at Work Regulations with regards to health surveillance. Managing Director Simon Dresdner, assisted by Neil Fagleman has assessed the circumstances in which health surveillance is necessary for the protection of employees.

As a result of this assessment, health surveillance has not deemed to be necessary at the current time. Simon Dresdner will periodically, or if circumstances dictate, review the assessment. Employees should report to their immediate line Manager as soon as possible any health issue they attribute to their work e.g. inflammation of the skin.

Emergency Procedures

When on client's premises all employees will make themselves familiar with, and follow the emergency procedures for that location. When on Company premises, staff on hearing the alarm should evacuate the building immediately and proceed to the assembly point. If you have a visitor then they are your responsibility in an emergency. Do not re-enter or allow others to re-enter the building until authorised. On arrival of the fire service, the officer in charge will be informed by Simon Dresdner, or the most senior person on site, that all are safe or their last known position.

Accident and Near Miss Reporting Procedures

All accidents must be reported as soon as possible to their immediate line manager. The details of all accidents, no matter how trivial, shall be entered in the Company first aid book. These include but are not limited to cuts, abrasions, bruising, strains to joints and muscles, particles in the eye or any impairment of physical or mental wellbeing. It should be noted that acts of violence to staff resulting in injury, are required to be reported under RIDDOR – see below. Accidents and near misses will be investigated, and the degree of investigation will be proportionate and appropriate. Neil Fagleman is responsible for ensuring the circumstances of all accidents and near misses are investigated. Where applicable, he will report his findings to Simon Dresdner and instigate any new corrective measures formulated to prevent a re-occurrence.

A record of all reports will be archived securely and maintained by Neil Fagleman.

RIDDOR

The Company recognises its statutory requirement under the Social Security Regulations to ensure that all accidents and injuries to people at work are recorded and investigated, and its statutory requirement under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations to ensure that major incidents arising out of, or in connection with work, are formally recorded and reported. Simon Dresdner will notify the Health and Safety Executive of all reportable specified injuries, dangerous occurrences and occupational diseases which are legally required to be reported.

In simple terms the Regulations contain a list of which

- specified injuries (regulation 4)
- dangerous occurrences (schedule 2) and
- occupational diseases (regulations 8 and 9)

are legally required to be reported.

A reportable accident, dangerous occurrence, or case of disease is a comparatively rare event and especially in this Company's commercial undertaking.

Reporting over seven day injuries

In addition the Company has a legal duty to report “over 7 day injuries” where an employee is away from work, or unable to perform their normal work duties for more than 7 consecutive days. A report will be sent to the enforcing authority if the injured person is incapacitated from work, or is put on light duties for more than seven consecutive days, which are not part of their normal work (excluding the day of the accident but including any days which would not normally be classed as working days e.g. Bank holidays and weekends). Cases of over-seven day injuries shall be notified within fifteen days of the incident occurring.

Although the Regulations specify varying timescales for reporting different types of incidents, it is the Company’s policy to report the incident as soon as possible. Cases of disease will be reported as soon as a medical practitioner notifies the Company that an employee is suffering from a reportable work-related disease.

Reporting RIDDOR

RIDDOR cases will be reported by Simon Dresdner. He will undertake this “on-line”. Only fatal and major injuries will be reported by telephone. All other work related injuries and incidents reportable under RIDDOR will be reported via the on line forms on the HSE’s website.

Reportable specified injuries include:

- any fracture, other than to fingers, thumbs or toes;
- any amputation, dislocation of shoulder, hip, knee or spine;
- loss of sight (temporary or permanent);
- chemical or hot metal burn to the eye or any penetrating injury to the eye;
- electric shock or electrical burn leading to unconsciousness or requiring resuscitation or admittance to hospital for more than 24 hours;
- any injury leading to hypothermia, heat induced illness or unconsciousness or requiring resuscitation or admittance to hospital for more than 24 hours;
- unconsciousness caused by asphyxia or exposure to harmful substances or biological agent;
- acute illness requiring medical treatment, or loss of consciousness arising from absorption of any substance by inhalation, ingestion or through the skin;
- acute illness requiring medical treatment where there is reason to believe that this resulted from exposure to a biological agent or its toxins or infected material.

Dangerous occurrence

A dangerous occurrence is an event, which, may or may not result in injury or property damage but has a high potential for doing so and has to be reported. The HSE will also be informed of any dangerous occurrence, as defined by RIDDOR on Company or Client's premises.

Dangerous occurrences include for example:

- the failure of electrical equipment due to short circuit or overload resulting in a fire or explosion which renders the equipment unusable for 24 hours or more, or if the incident has the potential to cause death;
- the collapse or partial collapse of the floor or any wall of any building used as a place of work (includes walls being hit by vehicles);
- an explosion or fire due to the ignition of any materials which results in the suspension of normal work activities for more than 24 hours;

Occupational diseases

Where a person at work suffers from any of the occupational diseases specified under RIDDOR and their work involves one of the activities also specified against the corresponding disease, the Company will, having received a written statement prepared by a registered medical practitioner diagnosing the disease as one of those specified, notify the Incident Contact Centre.

Reportable diseases include:

- certain poisonings;
- some skin diseases such as occupational dermatitis;
- lung diseases;
- infections such as leptospirosis;
- other conditions such as musculoskeletal disorders.

The full list of specified injuries, dangerous occurrences and occupational diseases is contained in the Regulations.

Alcohol and Drugs

Attending the workplace when under the influence of alcohol or drugs that impair judgement and capabilities can be dangerous to you, colleagues and others.

Drugs that impair judgement and capabilities may include prescription or other legal 'over the counter' type drugs. Employees must inform Neil Fagleman should they be taking any such medication. He may place limitations on the work that an employee can undertake.

Merco Facilities Services Limited will take appropriate steps to ensure that none of our employees will-:

- Report for work having just consumed alcohol or under the influence of drugs
- Report in an unfit state due to the use of alcohol or drugs
- Possess, while at work, alcohol or drugs
- Consume alcohol or drugs while at work

Any employee found to be breaking the above rules may be removed from site, and may face disciplinary action.

Fire Safety

The Company recognises their duty under the Regulatory Reform (Fire Safety) Order 2005 to carry out risk assessments to identify, manage and reduce the risk of fire. This will be reviewed periodically as required, however not exceeding two years.

It is imperative that all employees are vigilant throughout their work etc and use a common sense approach to fire safety. In the main, prevention is always better than cure.

- Employees should not create unnecessary hazards e.g. overloaded bins. Do not leave it for someone else to do and remove any potential hazards you spot.
- Do keep all exits and walkways clear.
- Know your location in relation to fire call points and escapes.
- Employees are to ensure the safety of any visitors who are under their care.
- the Construction Phase Plan must set out the health and safety arrangements and site rules taking account, where necessary, of the industrial activities taking place at that location.

The Provision and Use of Work Equipment Regulations (PUWER)

The Company recognises its obligations to employees under PUWER where they use work equipment in the workplace. In general terms, the Company will ensure that equipment provided for use at work is:

- suitable and safe for the intended use
- maintained in a safe condition and, in certain circumstances inspected to ensure this remains the case
- only used by people who have received adequate information, instruction and training
- accompanied by suitable safety measures such as guards, markings and warning signs.

The use of any work equipment, which could pose a risk to the well being of persons in or around the work place, will be restricted to authorised persons. Employees shall not use work equipment for which they are not competent or authorised to do so.

Neil Fagleman is responsible for organising the maintenance and servicing of work equipment. Where equipment has been deemed unsafe to use, then it shall be quarantined immediately for repair where possible.

He will ensure that:

- where the use of equipment poses a specific risk, employees will be provided with adequate health and safety information and written instructions;
- persons who use, supervise or manage the use of work equipment will be adequately trained;
- equipment will only be repaired and serviced by a competent person.

Equipment shall only be used for the tasks for which it was designed. The Company understands that PUWER must be implemented alongside Regulation 3 of the Management of Health and Safety at Work Regulations and will, where necessary, undertake risk assessments of work tasks involving the use of equipment.

Risk Assessment

The Company recognises its duty under the Management of Health and Safety at Work Regulations (and also other specific regulations) to make a suitable and sufficient assessment of the risks to the health and safety of its employees (and that of persons not in the Company's employment) to which they are exposed whilst they are at work.

The Company uses both model and dynamic risk assessments as part of its risk management strategy in the workplace. The significant findings of the risk assessment will be conveyed to all relevant employees and where applicable third parties. If any employee believes the risk assessment to be invalid then he is to seek clarification from their supervisor.

Risk assessments will be reviewed if there is reason to suspect that it is no longer valid, or there has been a significant change in the matters to which it relates, or following an accident, incident or near miss. Relevant employees will be consulted during the review process as part of the process in ensuring that the assessments are suitable and sufficient.

The Control of Substances Hazardous to Health

The Company reviews all substances and processes undertaken by its employees. Assessments are produced for those that come within the scope of the Control of Substances Hazardous to Health Regulations (COSHH). The assessments will be based on the manufacturers and suppliers health and safety guidance, and our own knowledge of the work process.

Assessments will be reviewed periodically, whenever there is a substantial modification to the work process or if there is any reason to suspect that the assessment may no longer be valid. The Company will always seek to substitute substances with less harmful ones, or use alternative substances to completely eliminate the hazard. The Company will ensure that exposure of workers to hazardous substances is minimised and adequately controlled in all cases.

All employees will receive comprehensive training and information of the Health and Safety issues relating to the work and they must consult the relevant COSHH assessment before using any hazardous substance and implement the identified control measures stated in the assessment.

Bodily Fluids

The detail in this information sheet relates to the cleaning of small blood and body fluid (urine, vomit, faeces) spills defined as “a volume that is easily managed with a minimal amount of decontamination equipment and materials”. Occupational exposure is most likely to occur in the context of health-care; however, exposure may also occur in any workplace including client delivery setting where one individual is exposed to the blood or other bodily fluids of any other individual, e.g. following an accident.

What are the risks?

Blood and body fluid spills pose a risk of transmission of infection and disease, e.g. blood borne Viruses, diarrhoea and vomiting illnesses, such as norovirus. The main risk is infection following hand to mouth/nose/eye contact, and there is also a risk of infection via broken skin (cuts or scratches). It is therefore important to understand the risk of exposure and plan appropriately so that in the event of a spill it can be dealt with immediately and effectively. This includes ensuring that appropriate equipment for the cleaning of spills is available, and staff are appropriately trained on the correct action to take. Locally managers should ensure that arrangements and protocols are in place to deal with spillages immediately and appropriate consideration is made where required as part of risk assessment.

NB Large or major spills may require specialist cleaning. A large spill refers to a volume that would require more than one person, large amounts of decontamination equipment and material, and/or contamination of objects that would prove difficult to decontaminate, i.e., rugs, mattresses, furniture, electronic gear. A major spill is described as large amounts of blood and/or tissue (e.g. result of a death). In the event of a large or major spill, cleaning should not be attempted without first seeking clear advice including assessment of risk.

Spill kits

It is good practice to have “spillage kits” available on site. Spill kits should include PPE (e.g. gloves and aprons), bleach (or other chlorine releasing agent), instructions, paper towels or disposable cloths, scoop and waste bags and can be made up by staff or bought commercially. A named person should be responsible for checking and replenishing items for kits regularly, (e.g. first aider). Your staff should ensure that during residential visits the accommodation has suitable equipment and or arrangements in place as part of their pre and arrival checks to deal with spills.

Training

Only individuals trained in safe and effective management of spillages should deal with spills. Spillages will require different management depending on the body fluid(s) involved and Managers should ensure that staff required to clean spillages have had appropriate instruction. Information provided should include details of safe working procedures; personal hygiene; how to decontaminate effectively; and what to do if something goes wrong.

General principles for dealing with spills

- Cordon off the area where the spillage has occurred.
- Ensure cuts and abrasions on any areas of the skin are covered with a waterproof dressing.
- Use personal protective equipment and clothing to protect body and clothes: disposable gloves and apron must be worn. Face masks and eye protection should be worn if there is a risk of blood or body fluid splashes to the face or facial contact with contaminated debris.
- If the spill contains broken glass or sharp instruments, safely dispose of them using a disposable scoop (or cardboard), without touching directly with your gloved hands. Discard safely (ideally into a sharps container) – see chapter on waste management.
- Use the correct cleaning procedure. Spillages will require different management depending on the body fluid(s) involved and it is important to use the appropriate procedure. The flow chart produced by the Health Protection Agency (HPA) attached below contains details for management of specific body spills.
- Use disposable equipment when cleaning spillages and dispose of waste appropriately. (Re-usable cloths and mops should not be used. In general waste contaminated with body fluids can be disposed of in the domestic waste stream if, it is produced in small quantities – i.e. less than 7kg (approx 1 bin bag) in one collection period and it is not infectious (after risk assessment). If items cannot be cleaned and decontaminated, they may need to be discarded safely. Heavily fouled soft furnishings may need bagging for disposal as clinical waste.
- Wash hands thoroughly after procedure.

A suitable disinfectant must be used to kill viruses and bacteria that may be present in blood and body fluid spillages. Chlorine releasing disinfectants (such as bleach, Milton, Haz-Tabs, chlorine releasing granules) at the correct concentration can be used to achieve this. If chlorine releasing agents cannot be used, use a disinfectant that is effective against blood borne viruses.

As with other all hazardous substances used at work, bleach and disinfectants should be stored, handled and used in accordance with COSHH (Control of Substances Hazardous to Health, 2002) Regulations and the manufacturer's instructions.

Sharps and Broken Glass

Safe Handling of Sharps Policy Statement The Health and Safety at Work Act 1974 imposes statutory duty on employers to ensure in so far as is reasonably practicable the health and safety of their employees whilst at work. This duty also extends to the employee to take care of themselves and others who may be affected by their acts and omissions. Sharps include needles, razor blades, broken glass or other items that may cause a laceration or puncture. The risks of problems consequent upon a needle stick injury are low. Essentially, the hazards are of straightforward bacterial infection and blood borne virus infections such as viral hepatitis (B, C, D and G) and HIV.

Practice It is the policy of Duval that on the discovery of any sharp product the officer should immediately inform the client and where possible isolate the area and wait for their arrival. If this is not possible then the following points are implemented when dealing with Sharps. Used sharps should be handled as little as possible to minimise the risk of injury.

Always wear disposable Latex gloves. Latex can reduce the risk of transmission of a blood borne virus by 50% from a contaminated needle. Sharps safe gloves should be worn over the latex gloves. A pair of forceps or other suitable tool must be used to pick up any sharps. Pincer poles should be used for handling bedding and clothing when clearing houses.

Used needles must not be manually re-sheathed, bent or broken prior to disposal.

All sharps containers must be correctly assembled and correctly labelled clearly to identify source and used according to the manufacturer's instructions.

Sharps must never be carried in the hand to the point of disposal, but either carried in a tray or a sharps container brought to the sharp.

Sharps must not be passed by hand between staff.

Sharps bins must never be more than $\frac{3}{4}$ filled. Sharps protruding from the aperture present a major hazard to other users.

Used sharp bins must be stored in a location that precludes unauthorised access.

Sharps bins must always be sent for incineration.

The Management of subcontractors

The Company recognises its legal duty in relation to specialist contractors engaged to undertake specific works. Neil Fagleman will ensure that all specialist sub-contractors assigned to work on a project have the skills, knowledge and experience necessary to fulfil their role in accordance with Regulation 8 of CDM 2015 and Regulation 12 of the Management of Health and Safety at Work Regulations.

Contractors shall be able to evidence as a minimum that:

- only competent staff are engaged on the project;
- they have access to suitable and sufficient resources;
- all work equipment is inspected and maintained, and where applicable, tested and calibrated;
- where applicable, work equipment, tasks and substances are assessed and their employees are briefed and consulted on the work to be undertaken and the associated hazards and risks involved.

The Company undertakes monitoring of specialist contractors performance. Any deficiencies found are documented and corrective action is implemented.

Manual Handling Operations

The Company recognises its' duty with regard to the Manual Handling Operations Regulations. As such, the Company will, so far as is reasonably practicable, eliminate or reduce manual handling operations. Due to the operational activities of the Company, minor manual handling is inevitable. The Company will ensure that suitable and sufficient assessments are undertaken and reviewed, as and when necessary to ensure compliance.

An employee's individual capability will always be considered when he/she is to carry out any manual handling operation. Allowances will always be made by the Company for any health problem, which might have a bearing on the individual's ability to carry out manual handling operations in safety. If it is suspected that his/her state of health, whether permanent or during or after sickness could increase the risk of injury, medical advice will be sought.

Housekeeping on Site

Good housekeeping is a very important part of operational safety. A tidy site and workplace result in a safer and less stressful working environment, greater efficiency and better relations with colleagues affected by our works. Therefore, good housekeeping is to receive priority in all areas.

Whenever possible employees must comply with the following points:

- Tidy up as you go along and help to keep the premises clean and tidy as accumulated waste restricts access routes, is a fire hazard, and can increase stress levels for other employees on site.
- Keep walkways and accesses clear of materials, tools and equipment, and rubbish that could cause a trip hazard.
- Comply with the site rules regarding the disposal of waste.
- Stack/store goods/materials in a safe and tidy manner.
- Help keep welfare facilities such as toilets, drying rooms, kitchens etc clean and tidy.

Lone working

The Company will comply with its general duties under Section 2 of the Health and Safety at Work etc Act 1974 in relation to the possible hazards of lone working. The Company recognises its general duty to maintain safe working arrangements, and under Regulation 3 of the Management of Health and Safety at Work Regulations to carry out a risk assessment of the hazards to which employees may be exposed.

The key to maximising safety wherever lone work is under consideration is the performance of a satisfactory risk assessment.

The Company will address two main features:

- whether the work can be done safely by a single person.
- what arrangements are required to ensure the lone worker is at no more risk than employees working together

The Company will ensure that any lone working (planned or anticipated) is assessed and is limited to low risk activities.

Working at height

Work at height is defined as working at a place from which a person could be injured by falling from it, regardless of whether it is above, at or below ground level. As a general principle, the regulations apply to most work situations where people are required to work at height. Management shall ensure that any work at height is carried out in accordance with the requirements of the Work at Height Regulations.

The Work at Height Regulations – Regulation 8(e) Schedule 6 - Ladders

Both the Company and its employees understand the requirements of Schedule 6 of the Work at Height Regulations. The Company shall ensure that a ladder is used for work at height only if an assessment has demonstrated that the use of more suitable work equipment is not justified because of:

- the low risk and short duration of use;
- or existing features on site which cannot be altered.

The Company's cleaners use step ladders on site to access higher levels. They will receive suitable and sufficient training and information at their induction to enable them to use the step ladders safely.

The company operates an inspection regime for all ladders.

Noise

The Company recognise they have a legal duty under The Control of Noise at Work Regulations to protect the hearing of their employees and other persons affected by our activities. Where work is carried out which is liable to expose any employee to noise at or above a lower exposure action value the Company shall make a suitable and sufficient assessment of the risk from that noise to the health and safety of those employees. The risk assessment shall identify the measures which need to be taken to meet the requirements of the Regulations.

Personal Protective Equipment (PPE)

Personal Protective Equipment (PPE) is issued following the findings of a risk assessment and where the element of risk cannot be further lowered. The Company recognises that PPE should always be deemed as a last line of defence and never used where the risk can be lowered sufficiently thus eradicating the need. Where PPE is required staff will be given full information, instruction and training in its care and use. Effective protection can only be achieved when suitable PPE is correctly fitted, maintained and properly used. All employees on joining the company will undergo training in the safe use of all PPE that they will use in the workplace. The issue of PPE, and the associated information, instruction, training and supervision of its correct use will be controlled and in specific circumstances a register kept. Employees have a responsibility to wear all protective equipment provided and to use all safety equipment that is necessary. The employee shall take the responsibility to ensure this is complied with.

When selecting equipment those persons purchasing PPE on behalf of the Company will always take into account the environment that it is to be worn in, the physical effort required to do the job and the requirements of visibility and communication, and If different items of PPE are to be worn at the same time (e.g. ear defenders, goggles) they must be compatible with each other.

Asbestos and Asbestos Containing Materials (ACMs)

There are no known asbestos containing materials at the Head Office.

Electricity

The Company recognises the general requirement under regulations 4(2) that “as may be necessary to prevent danger, all systems shall be maintained so as to prevent as far as is reasonably practicable, such danger”. The Company will seek evidence from the landlord that this requirement has been undertaken.

Portable and transportable appliances

The inspection periods for these tests will be determined by risk assessment, and will for instance, take into account the type of use, working conditions, manufacturers guidance and recommendations, and the intervals suggested in HSG107 Maintaining Portable and Transportable Electrical Equipment. Neil Fagleman will ensure that these requirements are complied with and portable and transportable appliances are tested (PAT).

The Workplace (Health, Safety and Welfare) Regulations

The Company will provide a safe environment for all persons working and visiting the Head Office. The Company will ensure that the requirements of the Workplace (Health Safety and Welfare) Regulations are complied with.

As an overview, the Company will ensure:

- that safe access and egress is provided and maintained;
- an adequate supply of wholesome drinking water is provided;
- the offices are suitably and sufficiently illuminated and heated to reasonable levels;
- there are sufficient traffic routes, of sufficient width and headroom, to allow people to circulate safely with ease, and the offices are cleaned and rubbish is removed;
- the needs of individuals with a disability are adequately considered;
- portable electrical equipment is tested and maintained by a competent person;
- suitable and sufficient signage will be displayed at relevant points;
- suitable and sufficient sanitary conveniences, and washing and rest facilities are provided for all people working on the premises, and these will be maintained;

The Health and Safety (Display Screen Equipment) Regulations

The Regulations only apply to employees who regularly use display screen equipment as a significant part of their normal work (daily, for continuous periods of an hour or more).

The Company will provide suitable equipment, workstations and working environment for all its employees. Permanent, shared and hot desk workstations will be assessed.

The Company recognises its duty to –

- analyse workstations to assess and reduce risks;
- ensure controls are in place;
- provide information and training;
- provide eye and eyesight tests on request, and special spectacles if needed;
- review the assessment when the user or equipment changes.

The Company recognises its duties giving users a right to free eye and eyesight tests upon starting computer work and at regular intervals thereafter. Where tests show that corrective lenses are required for computer work, the Company will pay for these. The Company's obligation extends only to the provision of the basic lenses and frames. On joining the Company relevant employees will be provided with suitable and sufficient information, instruction and training in the safe use and set up of their workstation. Their workstation will be assessed, and any corrective actions required will be implemented as soon as possible.

All employees shall report any physical or mental problems when using display screen equipment to Neil Fagleman as soon as possible.

Drivers of vehicles on Company business

The Company will provide vehicles in a roadworthy condition and suitable for the tasks to be undertaken. The Company will arrange for the vehicle to be taxed, insured and maintained in accordance with the manufacturer's requirements, with MOT tests for vehicles when required.

The driver is;

- to present their driving licence for inspection by the Company, and to provide a summary of their driving experience, including details of any endorsements.
- responsible for routine checks, such as tyre pressures, screen wash, oil levels, bulbs and the like.
- responsible for giving notice of the mileage to the Company office to enable routine servicing to be booked.
- responsible for securing all items, tools, materials and the like carried in a Company vehicle, or on the roof rails or rack.

Any road traffic offence, including a parking offence committed by the driver will be the responsibility of the driver. The driver is to inform Neil Fagleman of any incident as soon as is practicable, particularly if damage or injury occurs.

Safe Systems of Work

The company operates safe systems of work. This is achieved through a combination of various elements including but not limited to the following:

- a safe place of work
- compliance with the Health and Safety at Work etc Act 1974
- the provision of adequate training, information and instruction with regards to an employee's roles and responsibilities
- the appropriate level of supervision and monitoring of work activities
- the use of work equipment complying with the requirements of PUWER
- risk management strategies including:
 - ✚ hazard elimination and risk reduction measures
 - ✚ risk assessments of tasks and equipment
 - ✚ safe procedures and methods of working
 - ✚ assessments of hazardous substances and processes

All employees shall be provided with adequate training, information and instruction with regards to their roles and responsibilities to enable them to be competent to undertake tasks on behalf of the Company. The information will be comprehensible and relevant.

Environmental Considerations

The Company is committed to safeguarding the environment and this is reflected in our General Environmental Policy Statement. The Company reviews all substances and processes undertaken by its employees as per the Control of Substances Hazardous to Health Regulations (COSHH). Employees shall use and follow the information contained in these assessments.

All accidents incidents and near misses that resulted in, or could have resulted in short or long term damage to the environment will be investigated by Neil Fagleman. The degree of investigation will be proportionate and appropriate. He will ensure that where appropriate, corrective action is taken to prevent incidents and near misses becoming accidents. A record of all reports will be kept at the Head Office.

Monitoring

It is essential that the company can demonstrate best practice in safety, health and environmental management. One of the primary and proactive means for achieving this is through monitoring which is undertaken by Neil Fagleman and the Area Managers as part of their daily line management function.