



# HEALTH & SAFETY POLICY



**MacLellan**  
rubber

**July 2017**

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# **PART 1: STATEMENT OF INTENT**

## **Health and Safety Policy Statement**

1. Maclellan Rubber Limited (The Company) recognises its health and safety duties under the Health and Safety at Work Act 1974, the Management of Health & Safety at Work Regulations 1999 and accompanying protective legislation, and the Directors recognise that they have a responsibility to ensure that all reasonable precautions are taken to provide and maintain working conditions which are safe, healthy and comply with all statutory requirements and codes of practice.
2. The Company, so far as is reasonably practicable, proposes to pay particular attention to:
  - a) The provision and maintenance of a safe place of work, a safe system of work, safe appliances for work, and a safe and healthy working environment
  - b) The provision of such information and instruction as may be necessary to ensure the health and safety of its employees and others, and the promotion of awareness and understanding of health and safety throughout the workforce.
  - c) Ensuring the safety and absence of health risks in connection with the use, handling, storage and transport of all articles, substances and equipment
  - d) Making regular assessments of risks to employees
  - e) Taking appropriate preventative/protective measures as identified by risk assessment.
  - f) Appointing Stallard Kane Associates Ltd to secure compliance with statutory duties.
3. In order that the Company can achieve those objectives, it is important that employees recognise their duty, whilst at work, to take reasonable care for the health and safety of themselves and of other persons. Employees should also co-operate fully with the Company or anyone else concerned, to ensure that their obligations are performed or complied with.
4. Maclellan Rubber Limited will ensure adequate resources both in terms of time and money are made available to the necessary people to ensure that the items listed above are implemented and all employees are provided with the necessary instruction, information, training and supervision to enable them to carry out their work without risk to themselves or others. An annual review of the Health and Safety Policy will also be undertaken to ensure it is relevant to the work being undertaken by the Company and all legislation quoted is up to date, where necessary the policy will be developed and expanded.
5. Maclellan Rubber Limited is also committed to the continuous development and improvement of the Company's Health and Safety Management System. The Company will ensure that the health, safety & welfare of any employee or subcontractor is not compromised for financial or commercial gain.
6. All employees of the Company agree, as a term of their contract of employment, to comply with their individual duties under the Health and Safety at Work Act 1974, and the Management of Health and Safety Regulations 1999 and other legislation, and to generally co-operate with the Company so as to enable it to carry out its duties towards them. The attention of all employees is drawn to the attached safety rules and procedures, and employees should recognise that failure to comply with their health and safety duties and obligations can lead to dismissal from employment. In the case of serious breaches, such dismissal may be instant without prior warning.
7. This policy has been prepared in furtherance of section 2(3) of the Health and Safety at Work Act 1974 and binds all staff. We request that our customers and visitors respect this policy, a copy of which can be obtained on demand.

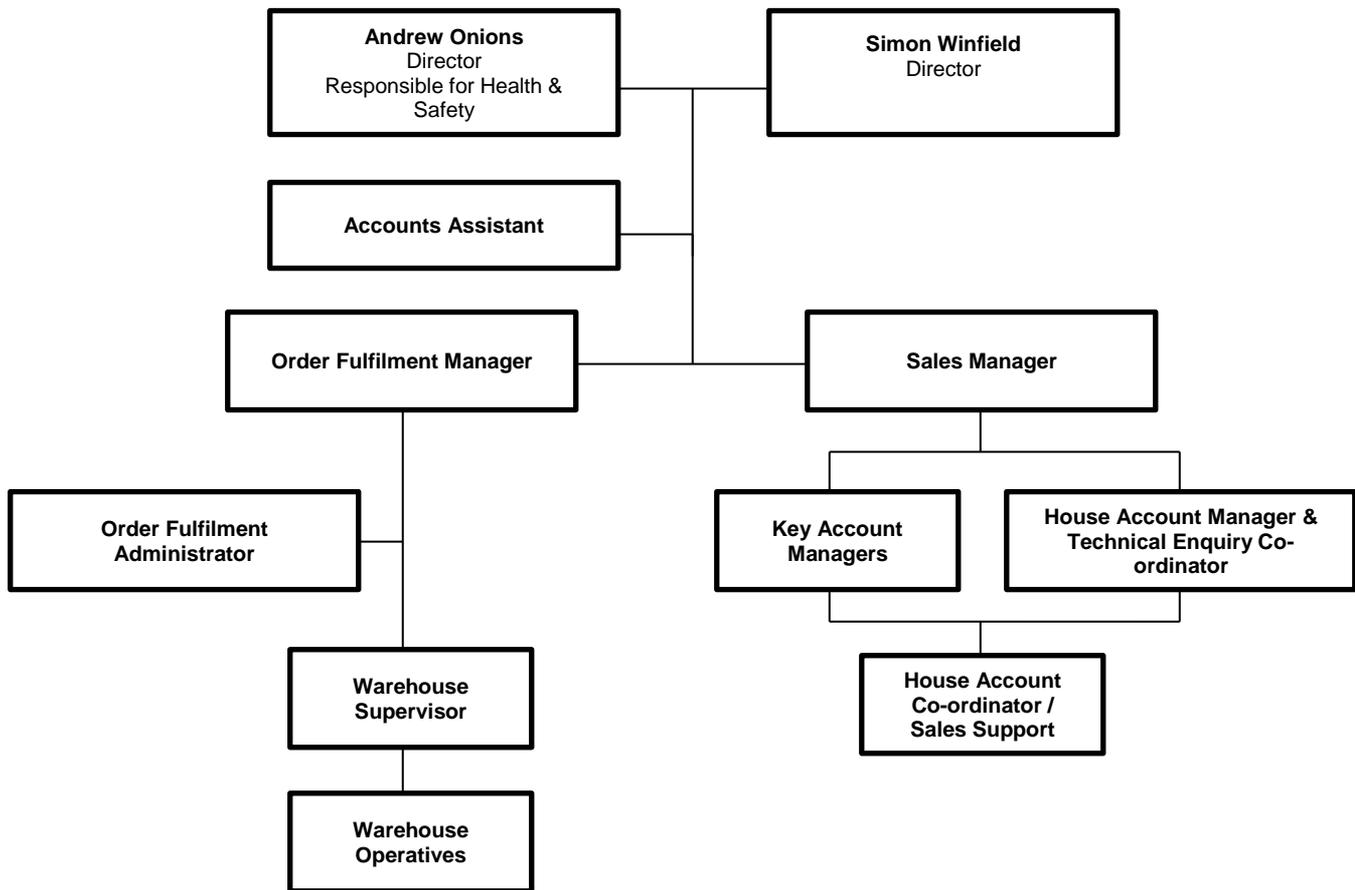
Signed:

Andrew Onions  
Director Responsible for Health and Safety  
July 2017



## PART 2: COMPANY ORGANISATION AND RESPONSIBILITIES

### Company organisational chart – management structure



Competent person for Health and Safety (Reg. 7 of MHSW Regulations 1999 refers) is Stallard Kane Associates Ltd located at:

Head Office: First Floor Offices  
11-23 Market Street  
Gainsborough  
Lincolnshire  
DN21 2BL

Telephone no: 01427 678660

## **RESPONSIBILITIES**

The Company has responsibilities under health and safety legislation towards:

- Employees
- Customers, visitors and the local community
- Members of the public
- Contractors/sub-contractors

### **All employees (general overview)**

The Company's obligations can only be met by ensuring that all employees fully discharge their responsibilities.

#### **Every employee must:**

- Take reasonable care for the health and safety of themselves, and others who may be affected by their acts or omissions at work
- Co-operate with management with regard to agreed health and safety arrangements and procedures
- Know and keep to the rules and procedures relating to their work, and report to their immediate manager/supervisor all difficulties or hazards liable to endanger themselves or other persons
- Not interfere with, or misuse, anything provided by the employer in the interest of health, safety and welfare
- Report details to the Director Responsible for Health & Safety, as soon as possible, if involved in an accident resulting in, or which may have resulted in, injury and in all cases before the end of the shift on which the incident occurs
- Arrange for any spillage of dangerous substances or flammable liquid to be dealt with immediately, having due regard to the nature of such spillage
- Use machinery and equipment only when authorised and properly trained to do so
- Wear or use correctly all protective clothing and equipment issued to them and get replacements for lost, damaged or defective items

## **Director Responsible for Health & Safety**

The Director who has overall responsibility for health and safety is responsible for ensuring that the policy enables the Company to fulfil its legal duties, and emphasises the determination to manage its activities so that standards of health and safety are continuously improved. The Director will monitor conditions and the health and safety performance to determine whether the policy is adequately resourced, effective and is being developed to meet changing requirements.

### **The Director Responsible for Health and Safety is responsible for ensuring that:**

- Safe systems of work are in operation, and staff receive adequate and appropriate training
- All personnel are aware of, and instructed in, their individual legal responsibilities, and that these are properly discharged
- All work carried out, and all plant, machinery and equipment complies with the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999 and the Provision and Use of Work Equipment Regulations 1998
- All plant, machinery and equipment is maintained in good working order, and any registered plant and small equipment carries valid certification
- Information on safety, health and welfare matters is effectively communicated to all employees
- All staff are conversant with the Company and Health and Safety Executive accident reporting procedures (RIDDOR)
- Adequate first-aid facilities are available in accordance with current regulations, and suitable persons are trained in first aid to the required standard
- Periodic statutory tests, inspections and maintenance of premises and equipment are carried out and records are properly maintained
- Fire precautions and portable appliances are in place and are tested, maintained, and kept up to date with the latest legislative requirements
- All staff are acquainted with the Emergency Evacuation Procedures and Emergency Plan
- Suitable Personal Protective Equipment (PPE) is available, issued and in use
- Staff are competent to carry out their work safely, and have received adequate information, instruction and training
- A personal example is set by the wearing of appropriate protective clothing
- All potential hazards, or reported hazards, are examined and evaluated and then eliminated or adequately controlled
- The following statutory notices are displayed:
  - A signed copy of the Health and Safety Policy Statement of Intent
  - Employer's liability insurance certificate
  - Health and Safety Law poster
  - First Aid (notifying the names and locations of the First-Aiders)
  - Fire Exit signs (with directional signs and running person)
- The following documentation is held:
  - Accident Incident Book (BI510)
- Health and safety improvement suggestions received from staff are given due consideration

## **General Directors Responsibilities**

The Directors are responsible for ensuring that the policy enables the Company to fulfil its legal duties and emphasises the determination to manage its activities so that standards of health and safety are continuously improved. They will monitor conditions and the health and safety performance to determine whether the policy is adequately resourced, effective and is being developed to meet changing requirements.

### **It will be the Directors' responsibility to ensure that:**

- Systems are in place to review and update this policy annually, when major staffing changes occur, or when new equipment is introduced
- Health and safety objectives for the Company are set and monitored
- Sufficient arrangements, facilities and finances are available for fully implementing this policy
- Safe systems of work are in operation, and staff receive adequate and appropriate training
- Appropriate financial requirements for the Company's health and safety function are contained within the legal resources
- The legal implications of relevant legislation are raised with, and understood by relevant employees
- Adequate resources are made available to allow the effective implementation of the Company's Health and Safety Policy

## **Nominated Person for Health and Safety**

### **The Nominated Person for Health and Safety is responsible for:**

- Health and safety on a day to day basis – implementation of health and safety procedures, precautions and controls
- Undertaking risk assessments within their department
- Encouraging the highest possible standards of health and safety within their department by effective communication and consultation with employees
- Monitoring standards of health and safety within their areas of concern
- Ensuring good standards of housekeeping
- Ensuring COSHH Risk Assessments are carried out within the area of their responsibility
- The provision and maintenance of suitable personal protective equipment
- Ensuring staff attend fire training sessions
- Carrying out hazard spotting checks of their department
- Assessing and meeting health and safety training needs

The above responsibilities will be implemented in association with Stallard Kane Associates Ltd, as the Company's 'Competent Person' for all health and safety matters, as defined by the Management of Health and Safety at Work Regulations 1999.

## **Company Competent Person**

As required by Regulation 7 of The Management of Health and Safety at Work Regulations, Stallard Kane Associates Ltd have been appointed to advise and assist all related health, safety and welfare issues related specifically to our business undertakings. Stallard Kane Associates Ltd will be responsible directly to the Directors and will also maintain a close relationship with all other employees.

### **Specifically, they will perform the following functions:**

- Advise on the application and maintenance of our Company Health and Safety Policy arrangements
- Maintain an up-to-date knowledge in matters of legislation and regulations as they apply and affect the Company and its Health and Safety Policy
- Advise the Directors on any related safety matters
- Monitor the Company's health and safety status by regular visits to site and ensuring our compliance with current legislation and our Company policy and standards
- Maintain a close liaison with the Health and Safety Executive inspectors and other appropriate organisations and departments relevant to our undertaking
- Advise Directors on training requirements for employees ensuring they are competent to carry out detailed tasks within the parameters of current safety legislation
- Advice on interpretation of legal requirements
- Assistance with strategy for implementation of the policy
- Provide investigations of serious accidents
- Revise the policy in the light of experience or legal change
- Advice upon the visit of an Enforcement Officer

## **Managers and Supervisors**

- All managers and supervisors are expected to demonstrate by example their total commitment to health and safety matters.
- Each manager/supervisor is responsible for his personal safety and that of all personnel under his or her authority, including others who may be affected by the Company's activities.

### **In particular, they will:**

- Understand and implement the Company Safety Policy
- Appreciate the responsibilities of personnel under their authority and ensure that each employee knows his/her responsibilities and are equipped to play their part
- Conduct/Assist with risk assessments on activities within their department, ensuring that the methods and systems of work are safe and ensure that the necessary procedures, rules and regulations designed to achieve this are formulated, published and applied
- Provide written instructions of work methods outlining potential hazards and precautions, and ensure they are complied with
- Ensure accident and near-miss reporting procedures are understood and complied with, and assist with accident investigations where appropriate
- Ensure all employees and sub-contractors are suitably trained/competent to carry out the prescribed task and that the necessary licenses/certificates of competence are in force and appropriate
- Ensure the Statutory Notices, the Safety Policy, Insurance Certificate and the names of appointed First Aiders are displayed and maintained in prominent locations
- Ensure that all new employees in the Company are provided with a copy of the Policy Statement, receive such induction training as may be laid down in procedures, are issued with personal protective equipment as required and are aware of their personal responsibilities as set out in this manual
- Reprimand any employee for failing to discharge their health and safety responsibilities
- Set a personal example with regard to health and safety matters

## **Employees**

The Management of Health and Safety at Work Regulations 1999 (M.H.S.W.R.) re-enacts the Health and Safety at Work etc. Act 1974, which places responsibilities on the employer and employees alike. In this connection, the Company reminds employees of their duties under Section 7 of the act: to take care of their own health and safety and that of others who may be affected by their acts or omissions. Additionally, employees must also co-operate with the Company to enable it to discharge its own responsibilities successfully.

### **Furthermore, all employees are expected to:**

- Carry out assigned tasks and duties in a safe manner, in accordance with instructions, and to comply with safety rules/procedures, regulations and codes of practice
- Consult their manager/supervisor if aware of any unsafe practice or condition, or if in any doubt about the safety of any situation
- Obtain and use the correct tools/equipment for the work and not to use any that are unsafe or damaged
- Store all tools and equipment in the approved place after use
- Ensure that all guards are securely fixed and that all safety equipment and personal protective clothing/equipment provided are used
- Not operate any plant or equipment unless authorised
- Report any accident, near-miss, dangerous occurrence or dangerous condition to the Director Responsible for Health & Safety
- Switch off and secure unattended plant or equipment
- Avoid improvised arrangements and suggest safe ways of eliminating hazards
- Not participate in horseplay or place fellow employees in danger by their actions

## **PART 3: GENERAL ARRANGEMENTS** **(SAFETY MANAGEMENT PROCEDURES)**

### **1.0 Systems and Procedures**

The Company recognises the importance of health, safety and welfare, and will adopt a systematic approach towards ensuring that a healthy and safe environment is provided and maintained for all employees and other persons who could be affected by our work activities.

Equally important is the need for constant alertness by the Director Responsible for Health and Safety and employees in identifying and eliminating potential hazards wherever possible.

**It is our primary objective that in conducting our activities, account must be taken by all parties of the need to:**

- Formulate and maintain safe working systems, including work carried out during maintenance
- Take all necessary steps to establish the causes of accidents and risks to health, which may occur, and to ensure that reasonable measures are taken to prevent recurrence
- Ensure that no process, chemical or equipment is introduced unless it complies (where required) with statutory testing or examination requirements. Also, to ensure that, so far as is reasonably practicable, the health and safety of employees etc. will not be affected
- Provide proper and adequate induction and training to ensure that all employees are fully competent in safe working methods applicable to their work
- Encourage the closest possible liaison between the Company and employees in matters relating to health and safety
- Ensure that all legal requirements relating to our activities are fully complied with, and progressively improve upon the levels of health and safety performance
- Consult with employees, and advise them of their legal duties and responsibilities, including the requirement to:
  - Abide by safe working systems
  - Make use of facilities and equipment provided for their protection
  - Refrain from any act which could endanger themselves or others
  - Refrain from intentionally or recklessly interfering with, or misusing, anything provided in the interests of health, safety and welfare
  - Report any known defect, which could endanger the health or safety of themselves or others
  - Co-operate as far as is necessary to ensure that we meet our legal requirements

## **1.1 Consultation with employees**

A requirement of the Health and Safety (Consultation with Employees) Regulations 1996 is for us to consult with our employees in all matters relating to health and safety.

The Company will convene regular meetings, to discuss all relevant issues relating to health and safety.

In particular, we will discuss the following:

- When introducing new measures which may affect health and safety
- The change in appointment of nominated competent persons
- The provision of statutory health and safety information
- Any statutory health and safety training
- Health and safety implications of introducing new technology, tooling or work activities

The meetings will be formal and significant findings of the meeting will be documented and displayed on Company health and safety notice boards, issued as memo's or discussed directly with employees in the form of toolbox talks.

## **2.0 Arrangements for implementing the procedures**

### **2.1 Communication with employees.**

We will ensure all employees are briefed on the Company Health and Safety Policy and other relevant health and safety information, firstly during their new starter induction when joining the Company, and periodically as the policy is updated or legislation is introduced/removed, or after any changes which may affect their health, safety and wellbeing. All employees will be provided with health and safety information on an annual basis as a minimum, in the form of a Health and Safety Booklet created by our external health and safety advisors. Employees will also be briefed by their manager/supervisor in the form of Toolbox Talks as required by the management team or advised by our external health and safety consultants.

In the event that an employee's first language is not English or where they have any other condition which may affect their ability to understand written or verbal communication, the Company will take the necessary steps to ensure the required information is effectively communicated. This communication may include the use of existing employees who speak the same language as the affected employee or employees who can read the same language. Where necessary, we will ensure written documentation is provided in a suitable language for employees to understand.

All employees are reminded that the Company operates an open door policy and all employees are free to contact any member of the management team regarding any health and safety concerns they may have, or where they have ideas which may improve the health, safety and welfare of employees. All concerns or ideas raised will be given due consideration by the management team and feedback will be given to employees where appropriate.

### **2.2 Fire Safety**

A written Fire Risk Assessment in accordance with the Regulatory Reform (Fire Safety) Order 2005 (FSO) will be undertaken, and kept up to date. The control measures identified will be issued to relevant employees. Training and information will be given as necessary.

Detailed procedures for evacuations, including exit routes and information on good practice, are held and available on request to any member of staff. Equipment checks and evacuation drills will be held at regular intervals. A Fire Warden will be appointed, and another member of staff will act as an evacuation 'Roll Caller'.

Staff will be trained in fire safety and the use of fire equipment. They will also be briefed on the role of individuals and the action to take in the event of a fire or other emergency.

### **2.3 Risk Assessment**

All significant hazards will be identified, and the associated risks assessed. Significant risks will be recorded. Simple, effective control measures will be agreed, with the involvement of the employees affected. Safe systems of work will be produced and implemented in respect of all work activities where a significant risk has been identified.

Written assessments and safety procedures will be carried out in all the production and administration areas and communicated to all affected employees.

Specific risk assessments will include:

- Manual Handling/PPE/COSHH/Risk
- Fire
- Machinery and Equipment, including Fork Lift Trucks, Lifting Cage and Loading Ramp

## 2.4 First Aid

The Health and Safety (First Aid) Regulations 1981 will be complied with and a suitable number of persons will be nominated and trained and certificated to the necessary standard, as per the findings of a First Aid Risk Assessment to allow sufficient cover for all working hours and shift patterns.

Details of the First Aiders will be displayed prominently for the benefit of all employees and visitors, and brought to the attention of all new employees at their induction stage.

Stock levels of items required under the regulations will be checked at regular intervals and boxes will be kept secure, yet quickly available when required. Special arrangements will be made to provide cover where employees work away from Company premises.

The Director Responsible for Health and Safety will maintain a register of certificated First Aiders, and will ensure that a minimum level of cover is provided at all times.

## 2.5 Accident Procedures

Details of all accidents will be recorded in the Accident Book, and where appropriate investigated by Stallard Kane Associates Ltd. Employees are required to assist with any investigation of accidents and/or dangerous occurrences that take place within their work area.

The requirements of RIDDOR will be followed in respect of any recordable/reportable accident or dangerous occurrence (see 2.6).

## 2.6 Statutory Notification of Accidents/Dangerous Occurrences

When a specified injury or dangerous occurrence has occurred, the HSE will be notified immediately and the online notification form will be completed and sent within 10 days of notification. Others to be notified as soon as possible are Stallard Kane Associates Ltd and the Company's insurers.

Notifiable occupational diseases will be reported to the HSE via the online notification form.

Where a person is absent from work or unable to perform their normal working duties as a result of a work-related incident/accident over seven consecutive days, the HSE Incident Control Centre will be notified within 15 working days from the day of the accident.

We will still record all over-three-day accidents, just no longer report them to the HSE. The entry into the Company Accident Book of over-three-day accidents will be a sufficient means of recording them.

All reportable accidents or dangerous occurrences will be investigated and a report issued. In their role as the Company's safety advisors, Stallard Kane Associates Ltd will assist with the investigation and give advice and guidance.

Action considered necessary to prevent a recurrence will be taken, and a report submitted to the enforcing authority.

## The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013

These regulations require certain accidents and dangerous occurrences at work to be notified to the Local Authority, and a guideline is set below:

### **Accidents which require immediate reporting to the local HSE:**

#### **Work-related accidents**

For the purposes of RIDDOR, an accident is a separate, identifiable, unintended incident that causes physical injury. This specifically includes acts of non-consensual violence to people at work.

Please note: not all accidents need to be reported, a RIDDOR report is required only when:

- The accident is **work-related**
- It results in an injury of a type which is **reportable** (as listed under 'Types of reportable injury')

When deciding if the accident that led to the death or injury is work-related, the key issues to consider are whether the accident was related to:

- The way the work was organised, carried out or supervised
- Any machinery, plant, substances or equipment used for work

- The condition of the site or premises where the accident happened

If none of these factors are relevant to the incident, it is likely that a report will not be required.

### **Types of reportable injury**

#### **Deaths**

All deaths to workers and non-workers will be reported if they arise from a work-related accident, including an act of physical violence to a worker. Suicides are not reportable, as the death does not result from a work-related accident.

#### **Specified injuries to workers**

The list of 'specified injuries' in RIDDOR 2013 (regulation 4) includes:

- A fracture, other than to fingers, thumbs and toes
- Amputation of an arm, hand, finger, thumb, leg, foot or toe
- Permanent loss of sight or reduction of sight
- Crush injuries leading to internal organ damage
- Serious burns (covering more than 10% of the body, or damaging the eyes, respiratory system or other vital organs)
- Scalpings (separation of skin from the head) which require hospital treatment
- Unconsciousness caused by head injury or asphyxia
- Any other injury arising from working in an enclosed space, which leads to hypothermia, heat-induced illness or requires resuscitation or admittance to hospital for more than 24 hours

#### **Over-seven-day injuries to workers**

This is where an **employee, or self-employed person, is away from work or unable to perform their normal work duties for more than seven consecutive days** (not counting the day of the accident).

#### **Injuries to non-workers**

Work-related accidents involving members of the public or people who are not at work will be reported if a person is injured, and is taken from the scene of the accident to hospital for treatment to that injury.

There is no requirement to establish what hospital treatment was actually provided, and no need to report incidents where people are taken to hospital purely as a precaution when no injury is apparent.

If the accident occurred at a hospital, the report only needs to be made if the injury is a 'specified injury' (see above).

### **Reportable dangerous occurrences**

Dangerous occurrences are certain, specified 'near-miss' events (incidents with the potential to cause harm). Not all such events require reporting. There are 27 categories of dangerous occurrences that are relevant to most workplaces.

For example:

- The collapse, overturning or failure of load-bearing parts of lifts and lifting equipment
- Plant or equipment coming into contact with overhead power lines
- Explosions or fires causing work to be stopped for more than 24 hours

Certain additional categories of dangerous occurrences apply to mines, quarries, offshore workplaces and certain transport systems (railways etc). For a full, detailed list, refer to the online guidance at: [www.hse.gov.uk/riddor](http://www.hse.gov.uk/riddor).

## **Reportable occupational diseases**

We will report diagnoses of certain occupational diseases, where these are likely to have been caused or made worse by an employees' work. These diseases include (Regulations 8 and 9):

- Carpal Tunnel Syndrome
- Severe cramp of the hand or forearm
- Occupational Dermatitis
- Hand-arm vibration syndrome
- Occupational Asthma
- Tendonitis or Tenosynovitis of the hand or forearm
- Any occupational cancer
- Any disease attributed to an occupational exposure to a biological agent

## **Exemptions**

In general, reports are not required (regulation 14) for deaths and injuries that result from:

- Road traffic accidents, unless the accident involved the loading or unloading of a vehicle

## **Recording requirements**

Records of incidents covered by RIDDOR are also important. They ensure that we (the Company) have collected sufficient information to allow us to properly manage health and safety risks. This information is a valuable management tool that can be used as an aid to risk assessment, helping to develop solutions to potential risks. In this way, records also help to prevent injuries and ill health, and control costs from accidental loss.

### **Records of the following will be maintained:**

- Any **accident, occupational disease or dangerous occurrence** which requires reporting under RIDDOR
- Any other occupational accident causing injuries that result in a worker being away from work or **incapacitated for more than three consecutive days** (not counting the day of the accident but including any weekends or other rest days). We do not have to report over-three-day injuries to the HSE, unless the incapacitation period goes on to exceed seven days. Entries in to the Company accident book will be a sufficient means of recording all over-three-day injuries

When requested, we produce RIDDOR and accident book entry records when asked by the HSE, the local authority or any other statutory inspectors.

## **2.7 Workplace Equipment Maintenance**

All new and existing equipment and facilities will be sufficiently designed, constructed and installed, so as to be safe and without risk to the health and safety of employees.

An adequately planned maintenance system will be operated, and records maintained.

Safe systems of work will be used and updated, such that protection against foreseeable maintenance hazards is provided.

All legally required maintenance, testing and inspections will be carried out and records kept in accordance with statutory provisions, insurer and fire authorities' approved codes.

Only qualified electricians are permitted to carry out work on electrical wiring and apparatus, using safe systems of work.

## 2.8 Personal Protective Equipment (PPE)

**Responsibilities:** Directors will be responsible for ensuring that only PPE to the correct standards has been issued and used.

Directors will ensure that all persons under their control are equipped with, and use correctly, any PPE provided to them. They will also ensure that risk assessments relating to their work are reviewed to enable them to identify what safety precautions (including PPE) should be in place.

**PPE assessment:** In accordance with the Personal Protective Equipment at Work Regulations 1992, an assessment of the PPE requirements of each employee will be made using the PPE Issue Record Form. For the purposes of co-ordinating safety management, the PPE assessment will be included in the Company's general assessment procedure detailed below.

It should be noted at this point that PPE would be used only as a last resort measure.

Where a hazard to an employee is identified, though the exact risk level is not known, then that employee will be given the maximum possible protection until an adequate risk assessment has been carried out.

**PPE correct standards:** All personal protective equipment purchased by the Company will be used to the correct BS or EN standard, equipment which is not CE marked will not be used.

The Directors, in liaison with the Company safety advisers, will ensure that the correct standard equipment is being purchased, issued and signed for on the appropriate form.

**Issue of PPE:** Employees will be issued with all necessary PPE relating to the hazards from their work activity, or as a result of the findings of any risk assessment which relates to their work environment. Where an employee makes a reasonable request for additional equipment, this will be reviewed by their manager/supervisor and where appropriate the equipment will be supplied.

**Replacement of equipment:** All PPE will be replaced on a new for old basis. Re-issue or replacement of worn out PPE will be requested using the record form, which will be held in the office, in order that usage can be monitored.

Any PPE which is so worn or damaged that it no longer affords adequate protection will be replaced before the employee is allowed to continue work.

**Training – correct use:** Employees who are required to use PPE to ensure their safety will be given training in its correct use. All training will be provided in accordance with the manufacturers' guidance.

**Personal preference:** Whilst every reasonable effort will be made to ensure that PPE satisfies requirements, the Company cannot guarantee to satisfy an individual's preferences. Once issued, PPE must be worn. It will not be left to the employee's discretion.

**Damage/misuse:** It will be the responsibility of the employee to report any faulty or damaged safety equipment to their manager/supervisor. It must then be exchanged as soon as possible.

Employees will not alter, deface or otherwise misuse any safety equipment supplied to them.

**Maintenance:** It will be the responsibility of each employee to ensure that PPE is maintained in good order. In order that employees can be correctly equipped with safety equipment at short notice, a reserve stock will be held by the office.

## 2.9 Electricity

Electrical equipment will be properly maintained to ensure that it is safe for normal use. All portable appliances will be examined prior to first use, then examined, and tested regularly thereafter. A register of appliances will be produced and kept up to date. The findings of inspections and tests will be recorded. Only qualified electricians are permitted to carry out work on electrical wiring and apparatus, using safe systems of working.

Where practicable, equipment will be switched off when not in use, or on leaving the premises. All cabling, plugs and connections will be properly organised, inspected, recorded and maintained to minimise any risks, in accordance with the regulations.

Employees will not carry out maintenance on electrical equipment or plugs without prior authority and training. Employees' personal electrical apparatus is not to be used on Company premises without prior permission.

The mains electricity supply will be inspected, and a certificate of test obtained from a 'Competent Person' in accordance with the timescales laid down in the regulations.

## **2.10 Premises and Welfare**

Environment, welfare and other related facilities will be maintained to the standard required by the Health and Safety at Work etc. Act 1974 and the Workplace (Health, Safety and Welfare) Regulations 1992. Particular attention will be given to the general fabric, temperature, ventilation, purity of air and water supplies, lighting, sanitary conveniences and noise.

## **2.11 Control of Substances Hazardous to Health (COSHH)**

The requirements of the COSHH Regulations 2002 and other related legislation will be satisfied. All necessary precautions will be taken in the use, storage and transportation of any material or substance. The least hazardous type of any substance will be used or purchased in order to minimise any associated risk. There will be regular assessments and monitoring to ensure that this is achieved.

No new substances will be introduced into the workplace until the information regarding possible hazards and the necessary precautions to be observed have been fully evaluated by a competent person.

**Responsibilities:** The Directors will be responsible for ensuring that this section is implemented and that all employees are given adequate information about any substances which are to be used.

Directors will ensure that the significant findings of any COSHH Assessment, including the safety precautions to be adopted, are communicated to all employees who will be exposed to the substances.

Employees will not use any substances unless a COSHH Assessment has been carried out and its findings communicated to them. If an employee has not received a COSHH Assessment or the relevant training, then they will cease use immediately and contact a Director.

**Hazardous Substances Register:** The Directors will create and maintain a Hazardous Substance Register. The register will contain Hazardous Data Sheets for every substance purchased by the Company. These data sheets will be supplied by the supplier of the substance and will be formatted so as to provide clear health and safety information, including first aid, fire precautions, emergency action, correct storage and safe handling.

**COSHH Assessment:** A COSHH Assessment will be carried out for every substance, or where practicable on substance groups.

All COSHH Assessments will be carried out on the standard form. The format of the assessment is such that it takes the following factors into account:

- Type of substance
- Work location/environment
- Work duration

All assessments will be in writing and will be held available for inspection at all times at an appropriate point in the workplace. A central file will be created which will contain master copies of all assessments carried out.

COSHH Assessments will be reviewed at the following times:

- If the work environment changes
- If it is requested by the employee
- In any case every 12 months

Any review will be recorded on the assessment with a review date and the name of the person who carried out the review.

**Substance Substitution:** Wherever possible, hazardous substances will be replaced with less hazardous ones. It will be the responsibility of the Directors to investigate the availability of replacement substances and put them to use as soon as possible. Substances must also be assessed as necessary. Advice from Stallard Kane Associates Ltd shall be sought where applicable.

**Safety Precaution Advice:** Any safety precautions recommended as a consequence of a COSHH Assessment will be adhered to at all times while the substance is in use.

**Handling and Storage:** All hazardous substances will be stored in correct storage facilities away from the work area. Storage facilities will be kept locked at all times and will be constructed as such that they do not pose a risk to the substance and will not allow any spillage to leak out.

Safety notices will be posted on all storage facilities warning of the dangers associated with the substances being stored together.

Only the minimum quantity required for immediate work will be removed from the storage facility. Persons required to handle hazardous substances will be given training in both correct handling techniques and safety precautions for hazardous substances.

The Director will be informed of any substantial spill immediately.

**Information and Training:** All employees who may be exposed to any hazardous substances will be informed of the existence of the Hazardous Substances Register and COSHH Assessment files at their safety induction.

They will be instructed to use these documents as reference to ensure that safety precautions are adhered to.

## **2.12 Contractors/Sub-contractors**

It is the responsibility of the contractor/sub-contractor to ensure that their employees adhere to, and co-operate with, legislative and Company rules in regards to health and safety whilst working for the Company.

It is also the responsibility of the contractors/sub-contractors to ensure that the health, safety and welfare of the Company's staff, visitors and others is not put at risk from their work activities and practices, and that safe systems of work are adhered to at all times.

Where contractors are to carry out work on site, they will be asked to provide evidence of health and safety competence in advance. Copies of risk assessments, COSHH Assessments, method statements, or similar documentation, must be submitted and approved by the Company's person responsible, as confirmation that risks to health and safety are being properly managed. All contractors will report to the prearranged designated person prior to commencing work.

The activities of contractors whilst they are on site will be monitored to ensure that their methods of work are safe, and do not put the safety of the Company's employees at risk.

## **2.13 Alcohol and Drug Abuse**

In industry generally there has been a move to greater controls and, in keeping with this, the Company has adopted a policy in relation to the consumption of alcohol and drugs.

The Company's policy on alcohol is intended to be a positive approach towards maintenance of the highest standards of safety in the workplace. It is also intended to benefit the health and safety of each individual.

Any employee who feels that they may have a problem relating to drugs or alcohol should immediately seek help from the Director Responsible for Health and Safety. This information will be treated in the strictest confidence. The Company will endeavour to offer any assistance available at the time.

Likewise, any employee taking prescription medication that may affect their ability to undertake their normal scope of work safely, must inform the Director Responsible for Health and Safety or their immediate manager/supervisor, so that alternative work can be allocated where necessary.

Employees must not attend work whilst under the influence of alcohol or non-prescription drugs.

Employees must not consume alcohol or non-prescription drugs on the premises.

Employees must not return to work after breaks under the influence of alcohol or non-prescription drugs.

**CONSUMPTION OF ALCOHOL IN BREACH OF THIS POLICY IS A DISMISSABLE OFFENCE.**

## **2.14 Company Smoke-Free Policy**

### **Purpose**

This policy has been developed to protect all employees, contractors, customers and visitors from exposure to second-hand smoke and to assist compliance with the Smoke-Free (Premises and Enforcement) Regulations (England) 2006.

Exposure to second-hand smoke, also known as passive smoking, increases the risk of lung cancer, heart disease and other illnesses. Ventilation or separating smokers and non-smokers within the same airspace does not completely stop potentially dangerous exposure.

### **Policy**

It is the policy of the Company that all of our workplaces are completely smoke free and all employees have a right to work in a smoke free environment. This policy shall be reviewed on an annual basis.

Smoking, including the use of electronic cigarettes, is prohibited throughout the entire workplace with no exceptions. This policy applies to all employees, consultants, contractors, customers and visitors.

### **Implementation**

Overall responsibility for policy implementation and review rests with the Directors of the Company. All employees are obliged to adhere to, and facilitate the implementation of the policy.

Directors shall inform all existing employees, consultants and contractors of the policy and their role in the implementation and monitoring of the policy. The Directors, or the person delegated to, will inform, during induction, all new personnel of the No Smoking Policy. Appropriate 'No Smoking' signs will be clearly displayed at the entrances to, and within the premises.

### **Non-compliance**

Local disciplinary procedures will be followed if a member of staff does not comply with this policy. Those who do not comply with the Smoke-Free (Premises and Enforcement) Regulations (England) 2006 are also liable to a fixed penalty fine and possible criminal prosecution.

## **2.15 Working at Height**

The Company recognises and accepts its responsibilities under the Work at Height Regulations 2005 and shall as far as reasonably practicable ensure:

- All work at height is avoided where possible
- All work at height is properly planned and organised
- All work at height takes account of weather conditions that could endanger health and safety
- Those involved in work at height are trained and competent
- The place where work at height is done is safe
- Equipment for work at height is appropriately inspected
- The risks from fragile surfaces are properly controlled
- The risks from falling objects are properly controlled
- They take account of the risk assessment carried out under Regulation 3 of the Management of Health and Safety at Work Regulations 1999
- That suitable rescue procedures are in place for all working at height activities and that employees are trained to use rescue equipment and follow rescue procedures

The Company will produce safe working procedures for all work at height activities.

## **2.16 Stress**

The Company is committed to protecting the health, safety and welfare of its staff and recognises that workplace stress is a health and safety issue. The importance of identifying and reducing workplace stressors is also acknowledged.

This includes:

- Improving the organisational environment through effective and consistent management
- Enabling individuals to cope successfully with their work
- Providing support to employees whose health and wellbeing are affected by stress
- Manage and control factors which might result in excessive or sustained levels of stress
- Increase awareness of stress and its causes and methods to combat it
- Assisting staff in managing stress in themselves and others

As far as reasonably practicable the Company will:

- Provide managers/supervisors with advice and support to help identify specific causes of stress
- Develop programmes for those with people management responsibilities to promote good management and team building skills
- Provide suitable training such as time management, assertiveness and dealing with difficult/sensitive situations
- Monitor the occurrence and levels of absence associated with stress
- Provide support to all employees

## **2.17 Display Screen Equipment**

In accordance with the Health and Safety (Display Screen Equipment) Regulations 1992, the following procedures will be followed:

- 'Users' of display screen equipment shall be individually identified by the Directors. They shall ensure that all 'users' have received sufficient instruction to allow them to operate the equipment provided, including the adjustment of screens, keyboards, chairs, foot rests, blinds, etc. Particular attention should be given to minimising reflection and glare.
- 'Users' shall be entitled to request an appropriate eye and eyesight test. Where 'special corrective appliances' are needed, a special pair of spectacles for display screen work may be prescribed. Any cost arising from these tests and appliances will be borne by the Company.

## **2.18 Safety Training**

### **Basic Training Considerations**

The Company recognises that safety training is an integral and important part of its overall safety policy and it will be given as a normal constituent of vocational training. No person will be employed on work involving any reasonably foreseeable significant risk unless he has received adequate training to help him understand the hazards involved and the precautions to be taken.

We will undertake an annual training needs analysis for all our employees, on an annual basis as a minimum, to ensure all employees have the necessary training and level of competence for the scope of works they undertake. The Directors are committed to providing sufficient funds and resources to ensure all necessary training is provided to employees.

### **Managerial Training**

The Directors recognise, as fundamental to the success of the Company Safety Policy, that management should have received the training necessary to control effectively the areas for which they are responsible.

### **Safety Advisor Training**

It is essential that the Safety Advisor's training needs are regularly appraised. They will be encouraged to seek such professional qualifications as befits the Company's needs.

## 2.19 Health Surveillance

**Responsibility:** The Director Responsible for Health and Safety shall ensure that health surveillance is provided where necessary for all employees and records maintained in line with data protection and health and safety legislation. Where necessary, reasonable adjustments will be made for employees with any existing health conditions that may be aggravated or made worse by any work activities undertaken by the Company. In order to monitor the health of all employees, an annual medical questionnaire will be issued and reviewed, and action taken in the event that an employee or employees have recorded any health issue or an increase/worsening of an existing condition due to the work environment.

**Procedure:** Where known occupational health risks exist within the Company's scope of works, a suitable and sufficient Risk Assessment and Safe System of Work will be developed for the work activity, and control measures implemented to ensure the health, safety and welfare of all employees affected. Where health surveillance is required, this will be outlined in the Risk Assessment and Safe System of Work and communicated to affected employees.

Directors shall, where work activities could cause health problems, regularly review the work activities and where possible implement engineering controls or substitute existing substances for less hazardous ones, and so reduce the occupational risk to employees and other third parties affected by the Company's scope of works.

Should any person have a health problem which could affect their health, safety and welfare while at the workplace, they shall inform their immediate manager/supervisor.

## 2.20 Manual Handling

### Responsibilities

The Director Responsible for Health and Safety will ensure that adequate resources are provided in order that manual handling can be avoided wherever possible, and will also provide training to any employee who is required to carry out manual handling operations as part of their work.

Managers/supervisors are responsible for ensuring that all manual handling operations have been correctly assessed in accordance with risk assessment procedures. They will ensure that manual handling is avoided wherever possible and that employees who are required to carry out manual operation have been correctly trained.

Employees will avoid manual handling wherever possible by using mechanical handling devices provided by the Company. Once trained, employees must use correct handling techniques to avoid injury.

Where an employee is injured as a result of a manual handling operation it will be reported in accordance with First Aid and Accident/Incident Reporting procedures.

### Manual Handling Risk Assessment

Manual Handling Risk Assessments will be carried out as part of the General Risk Assessment procedure.

For the purpose of risk assessment and identifying precautions, manual handling will be defined as the movement of any item using bodily force including:

- Lifting
- Lowering
- Pulling
- Pushing
- Twisting
- Turning
- Supporting

## **Handling and Stacking**

When handling, employees must use mechanical devices wherever possible. Managers/supervisors will ensure that mechanical handling devices are available and that materials are correctly stacked so that mechanical devices can be used safely.

Where manual handling of material is unavoidable, then it must be ensured that it is carried out by trained employees using the best possible method to avoid injury.

Manual handling methods to avoid injury should include:

- The planning of all manual handling activities
- The weight of the load being known
- Heavy items being positioned so that they can be slid rather than lifted
- Employees not being allowed to manually handle any materials which are too heavy
- Work stations being designed to avoid the necessity to bend down or twist the torso repeatedly or over reach when carrying out any operation
- All materials being free from burrs or sharp edges where possible
- Wherever possible, materials being stacked so as to avoid handling them twice and also avoid creating any additional hazards
- The use of PPE to avoid hand injuries

## **Personal Protective Equipment**

Personal Protective Equipment (PPE) will be issued as a result of the findings of the relevant risk assessment, having regard for the hazardous nature of the material being handled

## **Manual Handling Training**

Manual Handling Training will be provided to all employees who are required to carry out manual handling operations. All training provided will be in accordance with the Company's Safety Training and Information Procedure.

## Environmental Policy Statement

1. Maclellan Rubber Limited recognises its environmental duties under the Environmental Protection Act 1990 and the Waste (England and Wales) (Amendment) Regulations 2012 and the Director Responsible for Health, Safety and Environmental Issues, Andrew Onions, recognises that he has a responsibility to take an environmentally (and socially) responsible approach both to existing activities and to possible new developments.
2. The Company, so far as is reasonably practicable, proposes to pay particular attention to:
  - a) Minimising disturbance to the local and global environment, and to the local communities and wildlife.
  - b) Following the waste management hierarchy as outlined in the Waste (England and Wales) (Amendment) Regulations 2012. We will follow the hierarchy outlined below for waste generated:
    1. Prevention
    2. Preparing for re-use
    3. Recycling
    4. Recovery
    5. Disposal
  - c) Minimising the use of energy and raw materials and to adhere to the principles of sustainability.
  - d) Considering the environment in the design of processes and products and the maintenance of equipment.
  - e) Providing information on the use and final disposal of products.
  - f) Ensuring that all employees and suppliers are adequately informed about the Company Environmental Policy.
  - g) Minimising the use of product-related materials and services, such as packaging or transport.
3. In order that the Company can achieve those objectives, it is important that employees recognise their duty, whilst at work, to take reasonable care of the environment. Employees should also co-operate fully with the Company or anyone else concerned, to ensure that their legal and moral obligations are performed or complied with.

Signed:

Andrew Onions  
Director Responsible for Health, Safety & Environment  
July 2017

