

Health and Safety Policy

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Health and Safety Policy Statement

1.1 Policy Statement of Intent

Gard Plasticases Limited are fully committed to meeting our responsibilities under the Health and Safety at Work Act 1974, The Management of Health and Safety at Work Regulations 1999, and associated protective legislation. To achieve those objectives we will ensure the health, safety, welfare and wellbeing of all employees both directly employed and those who could come to harm from our wrongdoing.

As such we are committed to ensuring that:

- So far as is reasonably practicable, will establish procedures and systems necessary to implement this commitment and to comply with its statutory obligations on health and safety.
- Our premises and working practices are safe, well maintained, and comfortable, taking into account our employee's needs.
- Our organisation is well led, with competence of our employees defined by job roles and underpinned by effective information, instruction, and training.
- We integrate a risk-based approach when planning, delivering, and monitoring our work activities, using risk assessment as the main tool for ensuring our controls are proportionate and effective.
- Our work procedures and systems are safe, taking account of both planned and unexpected eventualities which are linked to our business continuity processes.
- Safe working processes are implemented for everything that we use, store, handle, transport, and dispose.
- Effective processes for communication and consultation are in place to enable employees to make a valuable contribution to continual improvement of our health, safety, and welfare processes.
- Supervision and monitoring of our standards for health, safety and welfare are embedded into our quality processes.
- Our working environment is safe, in line with legal and good practice standards and take account the needs of our employees.
- Our health, safety and welfare systems are supported by PHSC Ltd.
- We will strive to create a positive safety culture and have safety and welfare of all employees at the forefront of daily conversation.
- Health and safety is discussed, investigated and remedial controls implemented via the Health and Safety Committee in regular meetings and visits. The Health and Safety Committee will consist of the Senior Director, Directors, Production Manager, Site Manager, and where appointed, employee representatives.

Our polic	y will be regularly	y reviewed at Bo	oard level, and a	t least annually.

Signed:	Simon Tickle, Company Director
Date:	



ORGANISATIONAL ARRANGEMENTS

Health, Safety and Welfare

Organisational Chart





2.1 Roles and Responsibilities

This section lays out the key lines of responsibility and accountability within our organisation. They are linked with our organisational structure, and job descriptions for key role holders.

Senior Director

The Senior Director, Simon Tickle, has overall accountability with the implementation of health, safety, and management systems within our organisation. He will liaise with the other Directors to ensure that health, safety, and risk management is included in any strategic business planning. When the Senior Director is not on the premises, he may delegate some responsibilities to a Director, however, he will always remain accountable.

The Senior Director is also responsible for:

- Ensuring that there are sufficient resources, including financial resources, to enable systems and controls to be implemented.
- Ensuring that a proactive management strategy is implemented whereby health, safety and environmental risks are identified, managed, monitored and reviewed.
- Ensuring that regular updates will be produced on progress against strategy and KPIs set for safety and risk management to enable identification and management of resources and key risks to the business.
- Ensuring the health and safety policy is implemented throughout the organisation and is regularly reviewed.
- Ensuring the Production Manager and Site Manager are kept fully briefed regarding implementation of the policy, and any areas that require further attention or change.
- Ensuring a process for risk assessment is embedded throughout the organisation and employees have a mechanism by which key risks which are not adequately managed can be directly escalated to any Director for attention.
- Chairing the Health and Safety Committee (or delegating this role when work commitments prevent attendance).
- Ensuring that health, safety and welfare is included as a set agenda item on all meetings.
- Ensuring that health, safety, and welfare arrangements at Gard Plasticases Ltd. are provided.
- Ensuring there is sufficient access to competent health and safety advice.
- Liaising and delegating certain health and safety tasks to our Health and Safety advisors, where appropriate.
- Initiating a top-down culture in all health and safety matters.
- That a procedure is in place where serious accidents are investigated.

Operations Director

The Operations Director will ensure the following:

- That the Production Manager and Site Manager are kept fully briefed regarding implementation of the policy, and any areas that require further attention or change.
- That accident statistics are reviewed, including arranging for investigation of accidents.
- Initiate a top-down culture in all health and safety matters.



- That breaches of health and safety standards are linked with Gard Plasticases Limited's disciplinary procedure.
- There are a sufficient number of first aid personnel and fire marshals to meet demand.
- They attend health and safety meetings as and when required.
- Risk assessments are followed in regard to their tasks, if any work is not covered by a detailed risk assessment, ensure one is carried out prior to works.

Production Manager

The Production Manager is to carry out tasks in line with this policy document and as directed by the Senior Director and Operation Director.

They are to ensure:

- There are sufficient provisions of stock items, equipment and PPE needed to perform everyday tasks.
- Collections and deliveries run smoothly with documentation kept and stock movements recorded for the warehouse.
- Customer orders have been fulfilled.
- Employees are following correct health and safety standards.
- Regular checks are made of the first aid provisions.
- Any areas of concern regarding the health and safety of employees are reported.
- New employees (as directed) and agency staff are given their induction programme plus, to ensure they are introduced to appointed persons such as first aid personnel and fire marshals.
- Ensure that employees under their control are made familiar with the current fire prevention, evacuation and other emergency procedures.
- The working environment and housekeeping standards are regularly monitored.
- They attend health and safety meetings as and when required.
- The premises are regularly inspected for hazards and unsafe working practices, and that remedial action is taken.
- Employees have effective means to be consulted on health and safety issues.
- An assessment is undertaken and that suitable control procedures are designed and implemented before any new equipment or substances are used within the Company.
- That contractors are suitably vetted prior to any commence of works.
- That monitoring and reviewing of employees' systems of work is undertaken and remedial action is taken where shortcomings are identified.
- They advise employees on safe use of equipment and substances in their care.
- Implement local arrangements to check that equipment is properly maintained and that defects are reported.
- Ensure that action taken or needing to be taken under these health and safety requirements are reported to the Operations Director.
- They regularly inspect areas under their control for hazards and ensure that these are corrected or reported to the Senior Director or Operations Director. It is particularly important to see that exits and walkways are kept unobstructed at all times.
- There is a process for quarantined items with a paper trail for item returning to service.
- All equipment is safe to use with proper working guards in place.



- Risk assessments are followed in regard to their tasks, if any work is not covered by a
 detailed risk assessment ensure one is carried out prior to works.
- That accidents are investigated where required or requested by the Senior Director or Operations Director.

Site Manager

The Site Manager has responsibility for implementing the health and safety policy as directed by the Senior Director. In particular they should:

- Monitor the working environment and housekeeping standards.
- Check and sign off the forklift and reach trucks each day.
- Monitor activities to ensure that work is undertaken with proper regard for the health and safety of all those likely to be affected.
- Implement local arrangements to check that equipment is properly maintained and that defects are reported.
- Regularly inspect areas under their control for hazards and ensure that these are corrected
 or reported to the Production Manager. It is particularly important to see that exits and
 walkways are kept unobstructed at all times.
- Ensure the working environment and housekeeping standards are regularly monitored.
- Ensure there are clear procedures for the safe handling, storage, use and disposal of all tools, equipment and substances.
- Warn employees of the presence of contractors or other persons carrying out work on the
 premises or on equipment where particular hazards are involved, and that particular
 hazards to employees or to the public are explained to the contractor or persons involved.
- Ensure that action taken or needing to be taken under these health and safety requirements are reported to the Production Manager or Operations Director.
- Attend health and safety meetings as and when required.
- Ensure there are sufficient provisions of stock items, equipment and PPE needed to perform everyday tasks.
- Ensure areas of concern regarding the health and safety of employees are reported.
- Attend health and safety meetings as and when required.
- Ensure that maintenance inspections/services are carried out on machinery regularly (at least annually) with records kept. Where more frequent servicing/checks are needed this will be escalated to the Production Manager or Senior Director.
- Ensure risk assessments are followed in regard to their tasks, if any work is not covered by a detailed risk assessment ensure one is carried out prior to works.
- Ensure all equipment is safe to use with proper working guards in place.
- Ensure electrical isolation is performed in the way of locking off/tagging off during maintenance of electric equipment.

Employees

Employees have a legal and contractual duty to take reasonable care of the health and safety of themselves and others who may be affected by their acts or omissions, and to cooperate with management to ensure compliance in the operation of this policy, by ensuring:

Others aren't suffering any ill health or injuries through their acts or omissions.



- They co-operate with the organisation in meeting its statutory duties.
- They follow health and safety instruction and training received.
- They are fully conversant with this health and safety policy.
- Adherence to the Company's safety procedures.
- No-one intentionally or recklessly interferes with or misuses anything provided in the interest of health and safety.
- All accidents, incidents, dangerous occurrences and near misses are immediately reported in the accident book and reported to the Production Manager in accordance with the Company's policy relating to accident and incident reporting.
- Any injuries, near miss incidents, strains or illnesses' they suffer as a result of doing their job are reported.
- They co-operate in the investigation of accidents and incidents.
- They are fully conversant with all fire procedures applicable to the area in which they are working.
- All equipment provided for personal safety is used in a condition fit for that use and any defects reported immediately to the Production Manager.
- Any condition which in their opinion is hazardous, is reported as soon as possible to the Production Manager.
- Any hazards or failings in safety procedures are reported to the Production Manager.
- They undertake health and safety training identified through their job description and Company policies.
- The Production Manager is informed if something happens that may affect their ability to perform their tasks, i.e., becoming pregnant or suffering an injury.
- Full use of equipment, tools and substances offered by the Company is made.
- Risk assessments are followed in regard to their tasks.

Competent Health and Safety Advice

PHSC are the appointed Health and Safety Advisors who will operate as directed and advised by the Company Directors. PHSC provide competent advice but do not have authority or budgetary control to implement any required actions.

Contact details

Personnel Health and Safety Consultants Ltd (PHSC) The Old Church 31 Rochester Road Aylesford ME20 7PR

Tel: 01622 717700



2.2 Consultation with Employees

Our method for communication and formal consultation on health and safety is via our Health and Safety Committee. Information will be placed on noticeboards around the premises, which will be kept up to date and relevant. Meetings will be held at least quarterly and include a specific agenda item on health, safety, and welfare.

We will ensure that consultation is achieved at least for the following key areas:

- Introduction of new working practices or alteration in existing working practices.
- Dissemination of health and safety information.
- Introduction of new technologies, equipment, or materials.
- Renewal or revision of the content of the health and safety policy.
- Risk assessment processes.
- Health and safety training requirements/requests.
- Appointment of competent persons to assist with health and safety management.

Gard Plasticases Limited will make every reasonable attempt to include all employees in this consultation process.

Our communications system cross-references with our Whistleblowing Policy.



Procedures

3.1 Accident and Incident Reporting and Investigation

Any accident, however minor, must be reported to the Production Manager or first aid personnel and an entry made in the accident book. Completed forms will be held with the Production Manager. The accident book is kept in the Site Manager's office.

All incidents and near misses involving an employee, visitor, or other person are also to be reported and recorded so these can be addressed.

Any injuries, diseases or dangerous occurrences, which are 'reportable' under the *Reporting of Injuries, Diseases and Dangerous Occurrences Regulations* (RIDDOR), will be done so by the Production Manager, and a record will be kept on file for at least three years from the date of the entry.

If the Company deems an investigation is necessary, then the Production Manager (or Operations Director), with assistance from our Health and Safety Advisors (if required), will perform an investigation and put in place any remedial controls they feel appropriate.

Records of Investigations are to be held on file.

3.2 Asbestos Management

Gard Plasticases Limited have a duty to protect their employees, contractors and visitors from being exposed to asbestos, as they do with any other harmful substances. *The Control of Asbestos Regulations* introduces an explicit duty to *manage* asbestos.

In order to meet our duty to manage any asbestos on our premises to prevent exposure, we will ensure the following:

- Carry out a risk assessment to determine if 'asbestos containing materials' (ACMs) could be present.
- Record where the asbestos, or presumed asbestos, is located together with its condition.
- Take the appropriate action to ensure any ACM cannot be disturbed (e.g., through normal activities or by activities which affect the structure of the building such as refurbishment or upgrade works).
- Implement a management plan so that the asbestos survey is regularly reviewed and updated where relevant, and that any contractors, or others who could be affected, are notified of the presence of any ACM when they work on our premises.

The asbestos register is held in the Site Manager's office.

3.3 Contractors – Selection, Vetting, Monitoring and Management

The Senior Director and/or Operations Director, Site Manager and Production Manager will meet to discuss the requirements for a contractor to be on site. For major external works a survey will be carried out to determine the scope of the works required and to advise Gard Plasticases Limited of any contractors they recommend for the project.



Depending on the level and length of work required to be carried out, the Senior Director and/or Operations Director, Site Manager or Production Manager will invite the contractor on site to give an initial quotation and an explanation of their requirements. Once the quotation has been approved by the Senior Director or Operations Director, Gard Plasticases Limited will ask to see a copy of the following:

- Their Public Liability Insurance certificate.
- Competency certification.
- Risk assessments (where they employ five or more employees).
- Health and safety policy (where they employ five or more employees).
- Method statements.

These details are all stored on a contractor's file in the health and safety system on the Company server. Once the works have been completed the information is archived.

Gard Plasticases Limited will issue the contractor with an induction pack detailing fire exits, prevention equipment, location of the fire call points and assembly point. This will also detail the location of any asbestos. These are to be signed by each contractor when they are on site.

Daily, during the project, all contractors are to sign in/out of the visitors book to assist in fire evacuation.

Any monitoring of contractors will be carried out by the Site Manager or Production Manager.

3.4 Compressed Air and Gases

Gard Plasticases Limited have contracts to ensure six monthly service and maintenance visits per year are carried out for compressors and all related pipework and outlets.

Any defects found outside of these examinations are reported to the Site Manager. If the Site Manager does not have the competency to address the defect, then an external contractor will be called in. All records for maintenance of compressors and related pipework is held in the health and safety folder on the server under 'Services.'

3.5 Deliveries (Loading and Unloading)

Deliveries are taken in at The Arnold Business Park. This will be either the back entrance or the front entrance, depending on the size of the load.

Deliveries or collections are dealt with by a competently trained forklift truck user. The names of trained drivers are displayed on noticeboard and recorded on the training matrix.

Manual handling assessments have been completed and are to be followed when performing these tasks, any employee who feels they cannot perform the task are not to attempt it, and they are to report this to the Production Manager.

Deliveries and collections are carried out in an area with good vehicle circulation with the products taken directly into the storage area of the premises.

Any defects to the ground or forklift truck will be reported to the Site Manager immediately.



3.6 Display Screen Equipment (DSE) and Eye Test Policy

Gard Plasticases Limited will follow the obligations as set out in the Health and Safety (Display Screen Equipment) Regulations.

A user is defined in law as a person who uses DSE for a significant and substantial part of their work time, so Gard Plasticases Limited have set out the following:

Assessment

Upon induction employees classed as DSE users will carry out a DSE self-assessment for their workstation. Actions raised from assessments will be reviewed and addressed before being signed off. Gard Plasticases Limited will review assessments whenever there is a significant change to office layout, desk location change, or where a new assessment has been requested by the employee. Employees who report a pregnancy will be required to carry out a new self-assessment.

Display Screen User Training

Gard Plasticases Limited will provide appropriate information in correctly setting up and maintaining the employees' workstation. Employees are asked to let the Production Manager or Operations Director know immediately if there is any problem with their DSE, other equipment, the environment, or any personal health issues which could affect the ability to work safely and in comfort.

The following guidelines should be read and followed by all employees using DSE:

The Screen

- Adjust the contrast between the characters and the background to suit ambient conditions.
- Swivel and tilt the screen to suit individual needs.
- Identify appropriate screen height.
- Position the screen to avoid reflection and glare.

The Keyboard

- Tilt the keyboard to find a comfortable position.
- Allow space between the front of the keyboard and the edge of the work surface to give hand/arm support.

The Work Surface

- Make sure that it is large enough to easily accommodate the equipment.
- Adjust the document holder to a comfortable working position and make sure it is stable to avoid excessive head/eye movement.

The Chair

- Should be stable but allow easy freedom of movement.
- Adjust the height of the seat and the height of the tilt of the back to give a comfortable seating position.



The Environment

- Ensure that there is enough space to change position and vary movements.
- Ensure that lighting is adequate for the combination of screen work and non-screen tasks.
- Take regular breaks from display screen work.

Where an employee feels the need to report a problem, concern or request a new DSE assessment, they are to do so to the Production Manager or Operations Director.

Eye Tests

If an employee uses DSE for a significant proportion of each working day, they are entitled to an eyesight test at the Company's expense at reasonable intervals. This is generally every two years. Gard Plasticases Limited will reimburse up to £50 towards the cost of glasses where required solely for computer use, and upon confirmation from the optician that the glasses are for computer use only. Employees should contact the Operations Director for full details on entitlement and how to reclaim any expenses incurred.

3.7 Electrical Equipment

To ensure the safety of our employees and premises we will ensure that:

- The circuitry is tested in accordance with BS 7671 at least every five years (or as advised by the testing engineer) and any C1 or C2 faults are prioritised for attention.
- Any electrical contractors are competent and working to the current standards set by the NICEIC.
- Circuit breakers and other protective devices will be fitted into the electrical system, where relevant.
- Portable electrical equipment (i.e., anything with a plug on it) will undergo regular visual inspection and periodic electrical testing.
- Electrical equipment brought into the Company conforms to CE or UKCA standards.
- Personal items of electrical equipment are not permitted unless they have been electrically tested and approval has been obtained from the Site Manager or Production Manager.

Anyone using electricity and electrical equipment is to be made aware of the risks of electrocution, electric shock, burns, fire and explosion. All precautions must be taken to reduce such risks. Assessment of foreseeable risks of personal injury or death associated with work activities involving electricity has been undertaken and will be reviewed as required by law. Gard Plasticases Limited will ensure all electrical equipment is well-maintained.

Where maintenance is being carried out on machines, the electrical circuit is isolated and locked/tagged off by the Site Manager. Only the Site Manager can remove the lock/tag.

Fixed electrical installations (including wiring and the socket outlet or isolator) will be checked regularly by a qualified and competent electrician to ensure that they are safe and in good condition.



Employees must report any fault or defect which they notice in any electrical installation or equipment to the Site Manager or Production Manager as soon as they discover it. Defective installation or equipment must not be used until fully repaired by the competent person.

Electrical equipment must be safe and suitable for its intended use and must be used in accordance with manufacturer's instructions and information, and instructions and training (where appropriate) provided or arranged by the Company.

All electrical equipment, including portable electrical equipment, will be placed on the electrical equipment log on file detailing records of regular testing (PAT). This is held with the Site Manager.

All flexible cables must be examined frequently to ensure that they are free of damage. Trailing, frayed and loose cables must be reported immediately to the Site Manager or the Production Manager so these can be taken out of use.

Flexible cables of excessive length must not be used. In so far as this is practicable, there will be sufficient socket outlets to avoid the need for long flexible cables or extension cables. Extension cables should be used with caution.

Where used, all cables must be:

- Kept clear of the floor or be protected to prevent heavy objects being placed or dropped on them, or people walking or tripping over them.
- Protected where they pass over or round sharp objects or corners.
- Kept clear of radiators and pipework.
- Laid to avoid being trapped in doors.

3.8 First Aid Personnel

Responsibilities of first aid personnel are:

- To maintain life in the event of an emergency until professional assistance arrives.
- To deal with minor injuries to employees.
- To assist injured persons in completing the accident book.
- To notify a Director or the Production Manager when an employee is injured and awaiting treatment.
- To arrange for emergency services to be contacted when professional assistance is required.
- To maintain supplies of first aid equipment in first aid boxes (or report to the Production Manager when supplies are needed).
- To attend training sessions and/or re-qualification courses arranged by the Company.

Regular checks are carried out by the Production Manager to check the date and provisions of the first aid box.

Names and locations of first aid personnel are displayed on signs around the premises.

The current first aiders are as follows:



Name	Location

3.9 Fire Marshals

Fire marshals will be appointed to cover all parts of our workplace. This role is important in checking that work areas are evacuated and reporting to the Designated Person at the assembly point, if and where there is anyone in difficulty or refusing to evacuate. The Designated Person is the Site Manager or in their absence the Operations Director.

Fire marshals have the following duties:

- When the fire alarm sounds walk your area to ensure that everyone is leaving. Check toilets, cupboards and any area not in direct view.
- Assist anyone who is in difficulty out of the building.
- Go to the assembly point and report to the Designated Person. Give details of any problems or persons who need assistance so that the emergency services can be told. This will allow early search and rescue to take place.
- Be prepared to stand outside a fire exit to stop people entering or returning to the building.
- NEVER put yourself at risk.
- If anyone is uncooperative or refuses to leave the building, do not stay to persuade them. Take a note of their name and continue your duties, reporting the situation to the Designated Person at the assembly point.
- Regularly check your area of responsibility to ensure that it remains safe to use during
 emergency evacuation (e.g., exit routes are unobstructed, extinguishers have not been
 tampered with or removed, fire doors are kept closed but not obstructed). Report any
 such failings to the Production Manager or Site Manager.

If a fire marshal leaves the area for which they are responsible, they must inform the Production Manager or Site Manager so that alternative arrangements can be made.



The current fire marshals at Gard Plasticases Limited are as follows:

Name	LOCATION

3.10 Fire Precaution and Emergency Evacuation

In line with the Regulatory Reform (Fire Safety) Order, Gard Plasticases Limited will ensure the following:

- A fire risk assessment is completed and regularly reviewed and updated.
- Fire alarm and detection equipment is put into place where appropriate.
- Firefighting equipment is installed and serviced annually.
- All employees are trained in fire safety arrangements of their workplace, and actions to take in the event of a fire.
- Emergency evacuation procedures are devised, recorded, and implemented.
- Fire drills occur at least annually.
- Suitable personnel are appointed and trained to coordinate an emergency situation.
- Fire safety signs are displayed.
- Evacuation procedures include arrangements for disabled personnel and visitors.

Fire extinguishers are at convenient places throughout the premises. Their positions are clearly indicated by signs. A competent contractor maintains these annually.

Green and white signs incorporating a pictogram of the 'running person' indicate designated fire exits. Employees should be aware of the location of fire exits and should never block any fire exit doors or passageways at any time.

Fire safety notices are displayed around the premises. These should be read and understood. Fire drills are conducted at least annually to reinforce these instructions.

Action in the event of a fire:

- 1. Operate the nearest fire alarm by breaking the glass panel.
- 2. Warn anyone in the vicinity of the fire and request someone to call the fire brigade.
- 3. Having checked for a safe escape route behind you, assess whether you are able to tackle the fire with a fire appliance.
- 4. In no circumstances should you take a personal risk.
- 5. Leave the premises by the nearest available exit.
- 6. Go to the fire assembly point.



DO NOT ATTEMPT TO COLLECT PERSONAL BELONGINGS.

The fire assembly point is the CAR PARK BY THE RIVER BANK.

In the event of an emergency, the fire alarm will sound, and a designated employee (fire marshal) will assume control, ensure the evacuation of all persons present to the assembly point.

The emergency services will be contacted when required and the Company will ensure compliance with any relevant emergency procedure.

The paramount consideration in all cases of emergency is human safety. The Company do not expect any employee to tackle a fire. Instead, all employees are expected to sound the alarm and get out. For the duration of any emergency, the fire marshal has overall control. Employees and visitors are required to fully co-operate with any fire marshal.

Disabled Employees and Visitors

It is the responsibility of the fire marshal to be aware of any disabled employee or visitor in their work area.

A personal emergency evacuation plan (PEEP) will be completed for all disabled employees/visitors. This plan will outline the actions to be taken in the event of an emergency.

All employees and visitors are required to familiarise themselves with the position of fire alarms, telephones, and fire extinguishers nearest to them and their place of work and of all routes to emergency exits from the building(s) in which they work or which they visit.

In addition, employees are required to know the sound of Gard Plasticases Limited fire alarm system and understand its meaning. The fire alarm system will be tested weekly, and the results recorded in a fire logbook. The logbook is held in the Site Manager's office.

All exits and exit routes must be kept clear and must allow safe and free passage in the event of fire. Corridors and staircases should not be used as working or storage areas. All exit doors should be able to be opened easily and immediately from within (in the direction of escape) and without the need for a key. Fire doors must be kept always closed, except when used.

Fire alarms, extinguishers and emergency lighting will be inspected, tested, and maintained regularly as appropriate to ensure that they are in an efficient state and working order and in good repair.

Any employee or visitor who hears the fire alarm should leave the building immediately and report to the assembly point. If there is time, employees should close all doors and windows. Employees and visitors must not stop to collect personal belongings.

Employees and visitors must remain at the assembly point (or move to any other area when directed by the fire marshal or emergency services) until authorised to re-enter building.



On completion of evacuation, the fire marshal must be able to confirm that all employees and visitors have evacuated the premises and/or whether there are any remaining employees and visitors within the premises and, if so, their identity.

Every event of fire must be reported and recorded in writing immediately after the event, any fire outbreak will be investigated and suitable procedures and/or arrangements put in place to prevent the future occurrence of similar incidents.

3.11 Forklift and Reach Trucks

Only trained personnel are to operate the forklift truck and reach truck. The name of trained persons are displayed on the noticeboards in the warehouse and the foam prep area. Details will also be recorded on the training matrix on file.

Refresher training will be provided as and when required.

The key must **NEVER** be left in the ignition when not in use, and employees are to ensure they follow their training and do not put others or themselves at risk.

The forklift truck and reach truck will be placed on the LOLER (Lifting Operations and Lifting Equipment Regulations) inventory list and undergo regular inspections by a competent person. This will be every six months or as recommended by the assessor.

All records of service, maintenance and inspections will be kept on file.

The Site Manager or user of the forklift truck or reach truck are to perform a daily forklift/reach truck check which is to be signed and kept in the folder by the forklift charging station.

3.12 Hazardous Substances and Processes

Gard Plasticases Limited aims to be fully compliant with the Control of Substances Hazardous to Health Regulations.

We will undertake assessments of all processes and working areas that use or store hazardous and explosive substances and will issue specific procedures and recommendations for a particular work process that involves a degree of risk to individuals.

COSHH assessments are held in the COSHH folder on file.

We will ensure all employees required to use hazardous substances receive chemical/COSHH training.

Safety Data Sheets

Employees are to be aware of the location of safety data sheets for all of the products that they use or handle during the course of their employment. Employees are to employ the specific recommendations given in the data sheets to control their levels of exposure to any harmful substances.



Safety Signage

Employees are to familiarise themselves with typical safety signage and hazard symbols expected on the products that they handle during the course of their employment. Typical hazard symbols are given below:







Corrosive



Highly Flammable

Spillage

Gard Plasticases Limited do not allow spilled liquids to enter the drainage system, remove sources of ignition, and ventilate the area naturally. Spill kits will be provided (see Spillages and Spill Kit).

Contain and Collect the Spillage with Non-Combustible Absorbent Materials

Identify the product and report to the Production Manager or Site Manager. The correct method of disposal should be identified and carried out according to the Environmental Protection (Duty of Care) Regulations, and Hazardous Waste Regulations. The relevant safety data sheet for the product may provide useful advice and guidance following spillage.

Waste Oil

Waste oil is not stored on the premises. This is removed by the external contractor in a suitable sealed contained when services are carried out on machinery and forklift trucks/reach trucks.

COSHH Assessments are held on file and reviewed at least annually.

3.13 Housekeeping

Poor housekeeping is one of the most common hazards that cause or contribute towards accidents at work. To maintain housekeeping at a high level we will:

- Arrange for all work areas to be cleaned regularly by employees.
- Arrange that the offices and welfare facilities are cleaned regularly.
- Provide suitable waste receptacles and ensure they are emptied frequently.
- Provide suitable storage areas for waste, including bulk items of waste.
- Undertake safety inspections.
- Instil a culture of 'clean as you go' and 'if you see it, clean/clear it.'

Fire marshals are to perform regular monitoring checks of escape routes to ensure they are clear and free from obstruction.

Any issues seen by employees must be reported to the Site Manager or Production Manager.



3.14 Induction

Every employee when starting with the Company will complete a Company induction which will include health, safety and environmental management. This is carried out by the Production Manager.

The induction checklist is completed, signed by the employee and stored both in their personnel folder and a record of the date kept on the training matrix.

3.15 Local Exhaust Ventilation (LEV)

Local Exhaust Ventilation is provided in the print room. We will ensure a system is in place to inspect and maintain the system by competent persons. This will be at least every 14 months. All records will be held with the Site Manager.

3.16 Lone Working

Due to the nature of our working days, there are no specified lone working activities conducted on the premises. Should this change or we start using the Company vehicle again, we will review this subject and inform all employees.

3.17 Maintenance

Onsite maintenance is carried out by the Site Manager and all records of work are kept in the maintenance folders in the Site Manager's office.

Annual machine service and maintenance is carried out by a competent and approved external contractor with records kept on file either as a soft or hard copy.

If employees spot any defects, they are to raise concern with the Production Manager or Site Manager.

If this Site Manager cannot resolve the issue/defect, the equipment/item is removed from service until a contractor completes the work and signs off the equipment/item.

All maintenance outside of competency is never attempted and a contractor is called in.

3.18 Manual Handling

Manual handling operations include any task which involves lifting, moving, and supporting loads through physical effort. Gard Plasticases Limited are to ensure that any lifting operation is assessed according to the following criteria:

Task: Twisting, stooping, excessive movements, repetitive

movements, frequent movements.

Load: Heavy, bulky, unpredictable, unstable.

Working Environment: Temperature, flooring, lighting, posture constraints.

Individual Capability: Unusual capability required, pregnant worker, poor health,

pre-existing health problem (e.g., bad back).



As far as reasonably practicable, hazardous manual handling operations will be avoided. Where a manual handling operation must be carried out, it must be assessed, and any significant risks of injury identified.

All reasonably practicable safety measures must be taken.

If in doubt, individuals should seek advice from the Production Manager. If there are any problems with any tasks, then these should also be reported to the Production Manager.

Employees are advised not to undertake any manual handling task that they feel is not safe to complete and to make full use of any lifting or carrying equipment that has been provided.

Gard Plasticases Limited will ensure all employees are given the appropriate training, information and instruction in manual handling, so the employees understand the principles and how to apply them to their daily tasks. Records will be kept.

Safe Lifting Techniques

The following principles should be considered as features of good movement and should be integrated into lifting and handling practices.

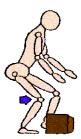
The following ten points should be remembered when lifting objects. Most of these seem like common sense - but if you have any doubt about them ask.

1. Stop and think

Don't lift more than you can handle - do you need help with the load? You should also use appropriate handling devices where these are provided. If you are in any doubt, ask before lifting.

2. Feet

Place the feet hip width apart. This provides a large base to balance the body. Place one foot, the lead foot, in front of the other and to the side of the load. This provides a better balance and reduces the risk of stumbling. The body should be as close to the load as possible.



3. Bend your knees

Bend your knees instead of bending at your waist. This helps you keep your centre of balance and lets the strong muscles in your legs do the lifting. If necessary, squat when lifting to minimise the stress on your back. By tightening your stomach muscles, you can tuck in your pelvis to help you stay balanced.



4. Hands

Tilt the load forward with the lead hand. The lead hand should be the same side as the lead foot. Tilting the load enables the person to gauge the weight of the load and to slip the other hand underneath the load easily.

Grip the load with the palms of the hands and the base of the fingers. This keeps the load under control and reduces tension in the forearms. One hand should be underneath the load and the lead hand at the opposite side of the load whenever possible.

5. Head

The upward movement begins by raising the head. This automatically straightens the back at the moment the load is taken .

6. Arms

Keep the arms close to the body and the elbows tucked in when carrying. This reduces tension and fatigue in the arms and shoulders. The load should be carried well down the body to reduce unnecessary muscular work.

7. The body

A smooth progressive forward movement should be incorporated when lifting to give momentum to the load and reduce stress to the body.

8. Hug the 'load' close to your core

Keep the load close to your core for as long as possible. If you are lifting from a shelf, try sliding the load towards you before attempting to lift it.



9. Avoid twisting

Twisting can damage your back and lead to serious injury. Make sure that your feet, knees and torso are pointing in the same direction when lifting and carrying.

10. Push objects - don't pull them

Whenever it is necessary to assist in taking deliveries for example, you should try and push cages rather than pull. You should judge any load prior to lifting by gently rocking it for example, and if you feel that it is too heavy for you to move on your own, get help.



Remember - if you have any questions relating to manual handling ask for help before you lift!

3.19 Monitoring

Regular health and safety site inspections to observe the premises, processes and safe working standards will be carried out. These inspection/monitoring forms will be stored on file with any recommendations noted and reported to the Senior Director or Operations Director for action to be taken.

The Production Manager or any of the Directors may also perform random spot checks outside of these inspections.

The Site Manager and Production Manager will also perform daily unrecorded monitoring checks to ensure competency is achieved, quality of work is monitored, and all health and safety standards as listed in this policy are being carried out.

3.20 New and Expectant Mothers

In line with legislation, we will ensure that we take account of the health, safety, and welfare of any new and expectant mothers, by assessing risks in the work activity. This will be arranged on a one to one basis, when the employee has notified us. Full account of confidential requests will be taken.

Anyone who is pregnant should notify the Operations Director or Production Manager so this can be arranged. Full account of confidentiality will be taken.

The phrase 'new or expectant mother' means a worker who is pregnant, who has given birth within the previous six months, or who is breast feeding.

The risk assessments for new and expectant mothers will be kept under review during the pregnancy, i.e., following ante-natal visits and/or every trimester. The number of reviews will depend on the nature of the pregnancy, i.e., high risk pregnancy will have more frequent reviews. Any significant risks will be reduced to a satisfactory level.

Where it is not reasonably practicable to prevent the risk to health and safety of a particular employee who is a new or expectant mother or to her unborn child, Gard Plasticases Limited may alter the employee's working conditions or hours of work if this is reasonable and will avoid such risk.

If it is not reasonable to alter the employee's working conditions or hours of work or doing so would not prevent health and safety risks, Gard Plasticases Limited may suspend the employee for as long as is necessary to avoid such risk. During her suspension, the employee will receive her normal contractual pay and benefits for each week of suspension.

3.21 Noise

Ear defenders must be worn by any employee using any process that involves exposure to hazardous noise. Ear defenders must also be worn by other persons in the immediate vicinity.



A noise assessment has been carried out and we will monitor ongoing changes to noise levels and review the assessment where there is reason to think the noise levels have increased to a level that may exceed the first action level of 80 dB(A).

Where the blue (mandatory) noise safety signs are on display employees must wear hearing protection.

Any concerns regarding hearing or hearing protection should be raised with the Production Manager.

PPE is regularly checked, and all defects reported and replaced.

3.22 Operating Machinery

Employees are monitored and assessed for their competence by the Production Manager after their initial trial period. Gard Plasticases Limited will start all new employees on the easier tasks before building their competence and confidence up.

The Production Manager will give the employee the required information, training and instruction on the correct operation of the equipment and/or machines they are to use.

All manufacturers' guidelines for the machines are to be carried out at all times with any defects reported immediately to the Site Manager.

On each machine there is a list of trained operators and trained maintenance staff. Employees must never use any equipment or machinery they have not been trained in. All employees are made aware of this on the start of their employment.

Should an employee have any concerns or require additional training in any equipment or machinery, they should raise this with the Production Manager.

3.23 Personal Protection Equipment (PPE)

Gard Plasticases Limited will provide appropriate PPE for the tasks carried out by employees following the risks being assessed. Gard Plasticases Limited requires all employees to wear or use PPE at the appropriate time.

All employees have a personal responsibility for their own health and safety and that of others so must ensure that this is exercised both through actions and in the maintenance and care of such clothing or equipment.

Any defects to PPE are to be reported to the Production Manager immediately where the item can be replaced.

PPE is inspected during regular spot checks.

During the risk assessment phase, the appropriate PPE will be determined and provided. Risk assessments will be reviewed annually or when there have been any changes in equipment or processes and will be completed by a competent person.

Where required and as soon as the employee has been deemed competent to use machinery or equipment, or they work in an area where PPE is required, PPE will be issued and as and



when thereafter.

Gard Plasticases Limited will keep a provision of PPE in the Site Manager's office. Stock levels will be the responsibility of the Site Manager or Production Manager. If a defect is found on PPE or the employee has misplaced and/or new PPE is required, then they are to contact the Site Manager or Production Manager who will supply new PPE.

3.24 Racking

Racking is provided in the warehouse and will be inspected by a competent person on an annual basis. Weight loads will be displayed to ensure racking is not exceeded. The Site Manager will carry out regular checks on the racking to report any damage. Racking protection is installed on corners of racking units to ensure adequate protection in the event of collision from the forklift truck or reach truck. Employees must report any damage they see on racking or if any racking has been damaged from a forklift truck or reach truck to the Site Manager as soon as they are aware of the damage.

3.25 Raising Machines in Adverse Weather

When Gard Plasticases Limited are informed by the Environmental Agency that a flood warning has been issued, all machines are raised onto sleepers to avoid water damage.

Gard Plasticases Limited have procured specialist jacks which are stored on site and are placed around the machines, centrally controlled by a pump, they are raised, then pillars placed under the machines. The machines will be lowered, and jacks removed. The pumps and jacks are serviced annually.

Any equipment is not to be used in this condition and will be lowered again once the Environmental Agency have removed the flood warning.

This process has been risk assessed which is reviewed at least annually.

3.26 Risk Assessment

For each task and/or area Gard Plasticases Limited will assess the risk to employees and ensure there are reasonably practicable measures put in place to control these risks.

Risk assessments can be found on file under Risk Assessments.

Risk assessments will be monitored regularly and reviewed at least annually, following an incident or accident or after a significant change. They may also be discussed at Health and Safety Committee meetings. All machinery risk assessments are attached to the relevant piece of machinery and employees must make themselves aware of these.

Employees may be consulted as part of the risk assessment process. They must read and comply with the risk assessment safety controls, and to report back to the Production Manager if the measures prove insufficient for a specific assignment.

Risk assessments are to:

Consider all those who may be affected by the hazards.



• Identify inspections required if there is a significant risk resulting from incorrect installation, deterioration or exceptional circumstances.

3.27 Spillages and Spill Kit

Gard Plasticases Limited will provide sufficient spill kits which are to be easily accessible. Spill kits will be stored in designated areas with the contents labelled on the side and will be of sufficient quality to contain the potential spillages on site.

Spill kits will undergo regular inspections during monitoring checks.

The correct method of disposal should be identified and carried out according to the Environmental Protection (Duty of Care) Regulations, and Hazardous Waste Regulations.

Spillages are to be cleaned up immediately, safety data sheets are on site to assist in the cleanup operation along with PPE.

Once a spillage has occurred, the area is cordoned off advising other employees of the hazard. The spillage will be cleaned using the spill kit provided and disposed of in the hazardous waste bin and collected by an approved waste carrier.

3.28 Stress and Wellbeing

Gard Plasticases Limited primary care is to all employees and, therefore, it is important to ensure all staff are content, comfortable and are confident in reporting any pre-existing conditions they may have in order for Gard Plasticases Limited to assess the information and place additional controls in place for those individuals who may be more vulnerable to the risks arising from their tasks.

If an employee were to report stress, they are to contact the Production Manager, who will escalate this to the Operations Director. The Operations Director will investigate the issue and put an action plan in place.

If employees prefer, they can go directly to the Operations Director.

All reports of stress will be treated seriously by the Company who will make every effort to resolve the issue in a timely manner.

3.29 Temporary, Agency Staff and Work Experience

Gard Plasticases Limited use external recruitment companies' agency staff.

Prior to their arrival at Gard Plasticases Limited, the recruitment companies are to hand the Gard Plasticases Limited Handbook, Health and Safety Policy and Risk Assessments to the agency staff member who is to sign to say they have been read and understood on induction at Gard Plasticases Limited.

All agency staff are provided with any PPE that is a requirement of their role.

If at any time, Gard Plasticases Limited aren't satisfied with the agency staff member, the recruitment agency will be advised that the employee is no longer required.



Where work experience persons are on site, an assessment to identify hazards and the associated risks will be undertaken by our Company. The school or college would also be expected to provide us with a risk assessment for the individual conducting work experience. Suitable control measures will be implemented and reviewed at regular intervals to ensure adequacy.

3.30 Training and Information

Health and safety training will be arranged through the Production Manager as and when appropriate. In particular, training will be provided upon employees joining Gard Plasticases Limited and on them being exposed to new or increased risk, e.g., following the introduction of new equipment, technology, or systems of work. All training will be recorded, and details added to the training matrix to identify when refresher training is needed.

Training may be face-to-face or online training and employees are expected to complete or attend any training required of them.

3.31 Vehicles

A Company vehicle is kept on our premises. At the moment, this is only being used by our sister company Target Plastics Limited. As and when required, the vehicle is serviced and maintained by us. The Operations Director will obtain driving licence details of any employees designated to drive the company vehicle through DVLA. Insurance is provided through our company.

A first aid kit is provided in the Company Vehicle and users of the vehicle must report any missing items to the Production Manager.

Informal spot checks on the Company vehicle will be carried out by the Site Manager.

Should the situation change, and the vehicle is to be used by Gard Plasticases Limited employees, we will ensure suitable steps are in place as well as obtaining driving licence information.

3.32 Visitors

The responsibility for visitors' rests with the person who invited them. All visitors will be given safety information as required.

All visitors will be required to sign in at reception where the information will be used by the fire marshal in the event of an evacuation to determine if the person has been safely removed from the premises.

Visitors must wear the appropriate PPE when visiting in areas of high risk.

3.33 Waste Management (including Hazardous Waste)

Removing general waste from site is the responsibility of Gard Plasticases Limited. It is they who have the contract and ensure the compactor is regularly serviced and maintained.

Any report of defects to the compactor must be reported to the Production Manager or Site



Manager.

Employees using the compactor will receive basic information and instruction on how to safely use this. A list of names of people who have been trained in the use of the compactor is displayed on the equipment. Staff who have not been trained must never use the compactor.

The appropriate method of waste disposal will be used according to the Environmental Protection (Duty of Care) Regulations, Waste Management Regulations, and Hazardous Waste Regulations.

All waste materials must be kept within the specific containers provided. Only licensed waste carriers, selected by Gard Plasticases Limited may remove waste from the premises.

Hazardous waste is stored in a lidded container in the print room. When this is full, this will be removed into the external hazardous waste bin and then removed by a licenced waste removal company. All records of hazardous waste removed from site are stored on file and kept for at least three years. Hazardous waste removal is the responsibility of the Site Manager.

3.34 Work Equipment

Gard Plasticases Limited will take all reasonable steps to reduce health and safety risks from work equipment to members of staff and others who may be affected. We will ensure that suitable, safe work equipment is provided and that it is maintained, tested, and inspected.

Adequate information, instruction, training, and supervision will be provided to ensure that work equipment is used in a safe manner and without risks to health.

Employees will make proper use of any equipment and systems of work provided for their safety.

Gard Plasticases Limited will ensure:

- That an assessment of the risks associated with the work equipment is conducted by a competent person.
- That all work equipment is suitable for its intended purpose and working environment prior to use.
- That ergonomic risks are taken into account when selecting work equipment.
- That the work equipment conforms with British and European Community Directives (including a declaration of conformity and a CE/UKCA mark).
- That measures are taken to prevent access to dangerous parts of work equipment or to stop their movement before any part of a person enters the danger zone.
- That (where appropriate) work equipment has accessible emergency stop controls and can be isolated from all its sources of energy.
- That the work equipment is properly maintained, inspected and tested, and kept in good repair.
- That the maintenance log is kept up to date.
- That members of staff who install, inspect, test and maintain work equipment are competent to do so.



- That members of staff who use work equipment and those who supervise its use are provided with adequate information, instruction and training.
- That young persons and work experience do not use work equipment unless they are being actively monitored by a competent person.
- Written instructions and safe working methods are provided for the work equipment, where required.
- That where inspections are undertaken records are kept.
- That training records are kept.
- That reasonable steps are taken to ensure that work equipment is used in a proper manner.

Employees using work equipment will:

- Use work equipment only if they have been trained and are competent to do so.
- Follow the safe methods of work, including wearing appropriate personal protective equipment when required.
- Report any defects in the equipment, personal protective equipment and guarding to the Production Manager.

3.35 Working at Height

When working at height, employees must take all necessary precautions to avoid the risk of falling. Employees must only use the equipment, stepladders and ladders, provided by Gard Plasticases Limited.

All working at height assessments are completed and must be followed. Where any new work at height activity occurs this must be reported to the Production Manager who will arrange for a work at height assessment to be completed.

Employees who perform any form of working at height will undergo Working at Height training which will be added to the training matrix. Training records will be kept.

All access equipment will be placed on a log where periodic checks can be made of the equipment to ensure it is fit for purpose.

Where possible, working at height will be avoided and will only be carried out by employees where absolutely necessary.

3.36 Whistleblowing

Gard Plasticases Limited are committed to always acting in a manner which is ethical, fair, even handed and in compliance with all laws, regulations, and obligations. The Public Interest Disclosure Act protects workers who raise legitimate concerns about specified matters from being dismissed by the Company or from being subjected to detrimental treatment or victimised by either the Company or work colleagues as a result, provided certain criteria are met.

Gard Plasticases Limited's policy is to support workers who raise protected disclosures. Employees must not victimise, subject to detrimental treatment, or retaliate against a worker who has made a protected disclosure.



Employees are protected provided they reveal information of the right type (known as a 'qualifying disclosure'), and they reveal that information to the right person and in the right way (known as making a 'protected disclosure').