



HEALTH AND SAFETY POLICY

CONVIRON EUROPE LIMITED

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INTRODUCTION

This policy sets out the commitment of Conviron Europe Ltd to provide a safe and healthy working environment and experience for its employees, contractors, visitors and any other persons affected by Conviron Europe Ltd operations. It sets out the requirements and arrangements to ensure compliance with health and safety legislation, related codes of practice and industry standards.

The Policy also establishes the health and safety requirements for work performed, so as to ensure the health and safety of Conviron Europe Ltd employees, contractors and visitors.

The legal framework and the specific requirements relating to Health and Safety policies are contained in section 2(3) of the Health and Safety at Work Act 1974 which states that “it shall be the duty of every employer to prepare and as often as may be appropriate revise a written statement of his general policy with respect to Health and Safety at work of his employees and the organisation and arrangements for the time being in force for carrying out that policy, and to bring the statement and any revision of it to the notice of all his employees.”

Section 2 of the Act provides a useful check list of the arrangements that must be implemented if the general policy and organisation are to be effective. These are the provision and maintenance of a safe place of work, safe access and egress; arrangements for the use, handling and storage of substances; the provision of information, instruction, training and supervision; consultation with the workforce and most of all, because it takes into account all these other factors, the provision and maintenance of safe systems of work.

This policy demonstrates that Conviron Europe Ltd accepts that having concern for health and safety is an integral part of its organisation at all levels and that the highest commitment from management will ensure that this concern is translated into effective action throughout Conviron Europe Ltd.

The law requires that the ultimate responsibility for health and safety in each workplace lies with the senior management, but in practice duties have to be delegated. It is this delegation that forms the health and safety organisation within a company which must be capable of demonstrating the following:

- The logical delegation of duties.
- The identification of key personnel.
- The definition of the roles of line and functional management.
- Arrangements for adequate support and advice.
- The nomination of persons with authority and competence to monitor safety performance.

This Health and Safety Policy is structured to assist management meet the requirements of relevant legislation and will be reviewed at least annually. Additional information and guidance may be required when new processes or activities are introduced, as a result of risk assessments undertaken by Conviron Europe Ltd, or after new legislation or Codes of Practice are introduced.

Further guidance and support documents, including monitoring forms and employee handbooks, are provided in the 'Health and Safety Guidance' manual which has been provided by Marsh Commercial.

Safety Objectives

Convion Europe Ltd has adopted the following objectives in relation to ensuring the health, safety and welfare of all persons working or otherwise affected by Convion Europe Ltd operations.

- To create as far as is reasonably practicable an accident free working environment for all employees and visitors who may be affected by our undertaking.
- To investigate all serious accidents as defined in the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) to any person as soon as possible and always within the time allocations as defined in the regulations.
- To provide health and safety training to all relevant workers on a programmed basis.
- To provide instruction and information to all persons working within Convion Europe Ltd regularly, as necessary and always in relation to relevant legislation as soon as possible after its implementation.
- To carry out Risk Assessments of all significant hazards required by the Management of Health and Safety at Work Regulations 1999 and to incorporate these within Convion Europe Ltd safety policy and related documents.
- To monitor the effectiveness of Convion Europe Ltd safety policy throughout its activities in accordance with the procedure laid down within this Policy.
- To ensure that adequate financial provision is made by Convion Europe Ltd to address issues relevant to health and safety.

HEALTH AND SAFETY POLICY STATEMENT OF INTENT

Conviron Europe Ltd recognises and accepts 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. The Managing Director recognises his responsibility to ensure the health and safety for all his employees, contractors, visitors and those members of public who may be affected by the companies' activities.

It is Conviron Europe Ltd aim to promote, set and maintain the highest standards for health, safety and welfare matters so far as is reasonably practicable. This will be achieved by: -

- Providing adequate control of the Health and Safety risks arising from our work activities.
- Consulting with staff on matters affecting Health and Safety.
- Providing and maintaining safe plant, machinery, and equipment.
- Identifying all reasonably foreseeable hazards and assessing the associated risks with a view to eliminating, reducing, or controlling them.
- Maintaining systems of work that are safe and without risk to health.
- Ensuring safety during the handling, use and storage of articles and substances which are inherently or potentially dangerous.
- Providing adequate information, instruction, training and supervision for staff.
- Ensuring all staff are competent to do their work.
- Preventing accidents and cases of work-related ill health as far as possible.
- Maintaining safe and healthy working conditions, environment and welfare facilities.
- Reviewing and revising this Policy as necessary at regular intervals; and
- Ensuring that all employees have access to a copy of this Policy.

Conviron Europe Ltd will aim to eliminate or control any hazard which may result in personal injury, illness, fire, security losses, property damage or harm to the environment. The allocation of roles and responsibilities and the arrangements to implement this Policy are contained within the policy and more specifically in the 'Organisation Roles and Responsibilities' section of the policy.

Successful implementation shall only be achieved by compliance with legal requirements, dedication and co-operation of staff at all levels and provision of adequate funding and resources by Conviron Europe Ltd.

This Policy requires the co-operation of all members of staff, contractors and our visitors. The Policy applies to all staff and others under the control of the business, including the self-employed, temporary workers, visitors and contractors.

Name: JOHN PROVEN

Position: PRESIDENT + CEO

Signed: [Signature]

Date: OCTOBER 5, 2022

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AROUS
CONTROLS

ORGANISATION ROLES AND RESPONSIBILITIES

The responsibility for health and safety rests with everyone, from senior management through to each individual member of staff. This section sets out the responsibilities under this policy.

The overall responsibility for health and safety within Conviron Europe Ltd rests with:

John Proven – President and CEO

The above-named person (and any future or replacement Director of Conviron Europe Ltd) are responsible for ensuring the establishment of an effective Health and Safety Policy within Conviron Europe Ltd and for publicly supporting all persons carrying out the policy and its objectives and ensuring standards of health and safety are continuously improved by promoting a positive health and safety culture within the organisation.

To ensure that sufficient resources, both financial and physical are available so that the policy and its arrangements can be implemented effectively. The above-named persons may delegate duties to employees who will provide support to meet these responsibilities.

To ensure that the spirit and the letter of the law is upheld, specific people or groups of people shall be appointed to be responsible for the implementation of certain key aspects of our health and safety policy and arrangements. These individuals may also delegate duties to other employees so as to enable the requirements of the policy to be carried out with due diligence.

Delegation of the individual duties and responsibilities to employees or any other third party does not in any way detract or remove the ultimate responsibility and duty of care placed on Conviron Europe Ltd or its Directors by the Health and Safety at Work etc. Act 1974.

To ensure that a strategy plan is prepared for the continual management of health and safety as part of the business objectives of Conviron Europe Ltd.

To ensure the periodic review and appraisal of the effectiveness of this Policy, and ensure that any necessary changes are made.

To ensure the appointment of suitable and adequate 'competent persons', as required under the Management of Health and Safety at Work Regulations 1999. With the assistance of the competent person/s, to measure, appraise and where necessary, correct Conviron Europe Ltd safety performance.

To ensure that this policy and the programme of implementation are understood at all levels through the commitment of adequate training resources and effective communication.

To ensure that responsibility for health and safety is properly assigned and accepted at all levels and that these areas of responsibility are periodically reviewed.

To arrange for a senior member of staff to act on their behalf and promote a positive Health and Safety culture within Conviron Europe Ltd.

INDIVIDUAL RESPONSIBILITIES

The duties of those employees with responsibility for health and safety are set out within our policy. Details of their individual responsibilities are set out within the 'Arrangements Section' for health and safety.

The person responsible for ensuring this policy is put into practice is:

Matthew Gilroy – UK Manager

Other duties will include:

- Identifying and controlling hazards present within our business activities.
- Ensuring risk assessments are undertaken and fully implemented.
- The development and implementation of safe systems of work.
- Ensuring that hazardous substances are assessed and any further actions are fully implemented.
- Liaising with the Enforcing Authorities as and when required.
- Identifying any training needs and ensuring employees are fully trained, have received adequate information / instruction and are competent to undertake their work activities.
- Trained and competent supervision is provided for employees (particularly trainees).
- The maintenance of the workplace, buildings, plant and equipment.
- Provision of fire, first-aid and emergency management.
- Ensuring waste is managed.
- Ensuring accidents are reported and investigated.
- Ensuring that any ill-health situations that are caused by work activities are reported and investigated.
- The activities of all employees, contractors and sub-contractors working on Convion Europe Ltd premises and on the sites of others are monitored and recorded on a regular basis.
- Liaison is maintained directly with Convion Europe Ltd professional health and safety advisers (Marsh Commercial) in respect of providing support in all areas of health and safety arrangements.

EMPLOYEES RESPONSIBILITY

In order to ensure that this policy and management of health and safety within Conviron Europe Ltd is effectively implemented and maintained all employees shall:

- Familiarise themselves with and conform to Conviron Europe Ltd health and safety policy and relevant company rules and regulations at all times whilst representing Conviron Europe Ltd and comply with any reasonable instructions issued by their manager concerning health and safety.
- Report accidents and incidents promptly and fully to their manager and to the Site Manager responsible for health and safety if working off-site.
- Conduct themselves in an orderly manner at all times and act responsibly whilst representing Conviron Europe Ltd.
- Inform their manager if at any time they are unsure about whether duties they are being asked to perform are safe.
- Not bring new equipment, plant or substances onto company premises or use them before permission has been granted by their manager and any necessary risk assessments have been conducted.
- Complete health and safety training that is put in place by Conviron Europe Ltd as soon as is reasonably practicable or as directed by their manager.
- Not to engage in substance abuse, excessive alcohol intake, or the taking of non-medical drugs during working hours. Employees found to do so shall be subject to disciplinary action.

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As required by Section 7 of the Health and Safety at Work etc. Act

- Take reasonable care of his/her own health and safety and that of other persons that may be affected by his/her acts or omissions; and
- Co-operate with his/her employers and others to comply with Health and Safety legal requirements.

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As required by Section 8 of the Health and Safety at Work etc. Act

- Not to misuse anything provided in the interests of health, safety or welfare.

As required by Regulation 14 of the Management of Health and Safety at Work Regulations 1999:

- To use any machinery, equipment, and dangerous substance, and transport equipment, means of production or safety device in accordance with any training or instruction provided.
- Inform Conviron Europe Ltd or person responsible for health and safety of any situation which represents a serious and immediate danger or any shortcomings in the arrangements for Health and Safety.

Employees should bear in mind that a breach of health and safety legislation by an individual could lead to disciplinary action being taken by Conviron Europe Ltd and constitutes a criminal offence. Action may be taken by an Enforcing Authority against an individual as well as Conviron Europe Ltd, with the possibility of fines and / or imprisonment.

EMPLOYEES GENERAL GUIDELINES

- You must not commit or allow to be committed any act which may result in potential danger in any way.
- You must attend as requested any training course, meeting etc. designed to further the interests of health and safety.
- You must observe all laid down procedures concerning work activities, equipment, materials and substances.
- You must ensure you understand the Health and Safety Policy and familiarise yourself with safety information and instructions.
- You must observe all safety rules on and off Conviron Europe Ltd property.
- You must comply with all written or verbal instructions given to you to ensure your personal safety and the safety of others.
- You must conduct yourself in an orderly manner at all times and not stray from responsible behaviour.
- You must dress with health and safety of yourself and others in mind.
- You must use the safety equipment and/or protective clothing provided.
- You must avoid improvisation in any form, which may create a risk to your safety or the safety of others.
- All employees are to obey the rules of Conviron Europe Ltd as contained in the Contract of Employment.
- You must not invite visitors onto Conviron Europe Ltd premises without permission from Management.
- If at any time you are unsure about duties you may be asked to perform, then you must inform your Manager/Supervisor.
- Co-operation is vital to ensure successful health and safety standards.
- Health and safety notices will be posted on notice boards from time to time you must ensure you view this information.
- No alcohol or non-medical drugs are to be consumed during working hours. Employees

CONTRACTORS AND SUB-CONTRACTORS

From time to time it will be necessary for Convion Europe Ltd to employ contractors to carry out work on our premises or to undertake work on our behalf offsite, and as such we have a “duty of care” to both Contractors and any Sub-Contractors who we engage.

In order to manage any Contractors or Sub-Contractors, we will ensure:-

- Contractors and Sub-Contractors will be assessed prior to appointment.
- Contractors will be provided with any relevant health and safety information including any known hazards relevant to our site or work activities.
- Risk assessments and method statements will be prepared where necessary and the control measures identified will be monitored to ensure that they are being complied with.
- Certain high risk tasks will be controlled by the use of a permit to work system administered by Convion Europe Ltd.
- All contractor employees will be provided with induction training on first arrival at our site and will be adequately supervised throughout the duration of the contract.
- First aid and accident investigation arrangements will be made with the contractor.

Every Contractor and Sub-Contractor 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 Convion Europe Ltd with regards to agreed health and safety arrangements and procedures;
- Know and follow the rules and procedures, as laid down by Convion Europe Ltd, relating to their work and report all difficulties or hazards liable to endanger themselves or other persons.

EXTERNAL COMPETENT ASSISTANCE

Competent assistance and advice is provided by:

Marsh Commercial Risk Management

The **Management of Health and Safety at Work Regulations 1999, regulation 7**, requires that every employer must appoint one or more competent persons to assist them with the implementation and provision of health and safety measures.

The organisation of Health and Safety Consultants has been contracted to ensure that Convion Europe Ltd is provided with the necessary information, advice and assistance to comply with current Health and Safety Legislation.

Marsh Commercial will carry out audits of our health and safety management documentation and systems in order to determine our health and safety performance and provide advice on overall strategies for health, safety and welfare within Convion Europe Ltd. These will be completed within the contractual arrangements as set out in the contract between Convion Europe Ltd and Marsh Commercial.

ARRANGEMENTS

This policy sets out Conviron Europe Ltd commitment to providing a safe and healthy environment and experience for its employees, contractors, visitors and any other persons affected by our undertaking. It sets out the requirements and arrangements to ensure compliance with health and safety legislation, related codes of practice and industry standards.

This section defines the standards, rules and procedures of the health and safety related issues and areas of risk that apply to Conviron Europe Ltd work activities and health and safety policy. It is the responsibility of all employees to observe these rules and procedures and to conduct themselves and carry out their work in a safe and reasonable manner.

Conviron Europe Ltd acknowledges that this policy cannot be achieved without the co-operation and commitment of employees at all levels, requiring the development and maintenance of effective means of consultation and communication between both employees and managers.

Conviron Europe Ltd believes that the most effective way to ensure the successful implementation of this policy is to designate roles and responsibilities to relevant employees within Conviron Europe Ltd. Where reasonably practicable for known and regular activities these roles have been assigned in this section, and it is up to the nominated representative to ensure they have read and understood the relevant arrangements for which they are responsible for.

Regardless of any designated roles laid out in the arrangements section, all employees should familiarise themselves with and conform to this policy and comply with any reasonable instructions issued by their manager concerning health and safety. The Employee Health and Safety Handbook summarises the main requirements of this policy and relevant company rules and regulations and should be read in conjunction with this policy.

Conviron Europe Ltd recognises that it is not possible to prepare in written form every safety rule that applies to the work activities and to employees as circumstances may vary depending upon the nature of work. Each department may also be required to develop procedures and risk assessments in relation to the specific work activities and tasks that are carried out.

All tasks will require the persons in control to apply `Planning` and `Monitoring` to the activities.

- **Planning:**
Prior to commencement of work, the person in control of any task, must determine which of these arrangements apply, and ensure that the appropriate materials, equipment and procedures are available to enable them to be implemented. Where necessary this will include undertaking any relevant risk assessments
- **Monitoring:**
It is essential that the persons in control of any task ensure that the standards are maintained throughout the task, therefore requiring standards to be monitored on a continual day to day basis including any relevant risk assessments, safe systems of work or permit to work.

It should be noted that any statutory references and guidance information referred to in the arrangements is not to be considered as an exhaustive list but merely a guide.

THE HEALTH AND SAFETY INFORMATION FOR EMPLOYEES REGULATIONS 1989 (AS AMENDED)

The regulations require information relating to health, safety and welfare to be provided for our employees by means of posters or leaflets in the 'approved form' and published for the purposes of the regulations by the Health and Safety Executive (HSE).

The regulations require the identification of Employees Safety Representatives and any other Health and Safety contracts to be written in the appropriate spaces on the poster, and when the leaflet is provided, you should specify the information in a written notice.

The poster 'Health and Safety Law' – 'What You Should Know' will be displayed in a prominent position in the workplace where it can be read by all our employees.

Information on the poster states who has overall responsibility for health and safety within Conviron Europe Ltd and the name of any safety representatives that have been identified

The poster 'Health and Safety Law' – 'What You Should Know' is displayed:

Employee Refreshment Area – Health & Safety Notice Board

NOTICES

All notices whether on Conviron Europe Ltd premises or elsewhere issued in accordance with the **Health and Safety at Work etc. Act 1974** and its associated legislation must be complied with.

All employees, visitors, and contractors alike must take the necessary action to ensure that they are familiar, as far as is reasonably practicable, with any warning signs and the meanings and interpretations of signs, both advisory and warning, and comply with them.

Any suggestions on how we may improve health and safety within Conviron Europe Ltd should be communicated to your manager/supervisor for assessment and consideration.

All employees will be provided with access to this Policy and to associated guidance and other documents relevant to their role which may include risk assessments, safety instructions or safe systems of work. All Employees must associate themselves with this Policy and any areas that are not understood shall be explained to them in detail by their manager.

It is the responsibility of the employee's manager/supervisor to ensure their employees understand and comply with this section of the policy.

Conviron Europe Ltd will ensure co-operation and co-ordination with other employers where relevant regarding the requirements of the regulations and ensure that the staff of those employers are provided with appropriate health and safety information where our activities may affect their health, safety and welfare.

Further information concerning health and safety matters are contained in the Employee Handbook which shall be issued to new starters and is available on the Intranet or the location where Employee Policies are made available. Employees should ensure they familiarise themselves with the Employee Handbook and raise any concerns to their Manager.

THE HEALTH AND SAFETY (CONSULTATION WITH EMPLOYEES) REGULATIONS 1996

Where there are employees who are not represented by safety representatives under **The Safety Representatives and Safety Committees Regulations 1977 amended 1997** the employer must consult those employees in good time on matters concerning their health and safety at work.

Convion Europe Ltd recognises the importance and benefits to be gained by consultation with employees on all health and safety matters. All managers/supervisors must consider this commitment when introducing any new measures in the workplace. Regular consultation and discussions with employees on health and safety matters is given high priority in order to gain their continued support and co-operation. This will be carried out by managers/ supervisors and Safety Representatives where they have been appointed.

Employees and/or their representatives are encouraged to raise any concerns about health, safety and welfare matters with their manager/supervisor or via the health and safety representative.

The use of company health and safety notices boards will be used to display relevant health and safety information and news. Employees should make themselves aware of the location of staff notice boards.

To allow the business to carry out this duty, consultation with employees will be the responsibility of:

Matthew Gilroy

Regular health and safety information will be posted on a specific notice board. The notice board is located in:

Employee Refreshment Area

The elected or nominated person/s to act as the employees' representative is:

David Dixon

Safety Representatives will be provided with sufficient information and training at Convion Europe Ltd cost to enable them to carry out their functions effectively.

Safety Representatives shall be allowed sufficient time off from their normal work to allow them to perform their functions and to consult with employees.

Safety Representatives shall be provided with information on reportable accidents and are encouraged to make representations on general Health and Safety matters, potential hazards and dangerous occurrences in the workplace.

Safety Representatives shall be allowed to consult with inspectors from a Health and Safety Enforcing Authority.

HEALTH AND SAFETY COMMITTEE

Conviron Europe Ltd will form a Health and Safety Committee with the following terms of reference and constitution:

The membership of the Health and Safety Committee will be subject to the agreement of the management and the respective employee representatives. However, the committee shall include a senior managerial representative nominated by Conviron Europe Ltd Director responsible for Health and Safety in order to ensure that there is adequate authority present to make decisions.

The meetings will be held on a quarterly basis, unless the Committee decides it would be beneficial to change this frequency to a more regular basis.

Each member of the Committee will receive a copy of the agenda and minutes prior to the quarterly meeting. A copy of the minutes will be placed on the health and safety notice board or brought to the attention of all employees using other alternative means of communication.

The terms of reference of the Committee will include:

- The review of any accident reports and near misses
- Review of safety audit and inspection reports
- Consideration of reports by safety representatives
- Consideration of reports by enforcement officers
- Development and monitoring of safety rules and safe working procedures
- Monitoring of the adequacy of health and safety policy
- Employee health and safety training requirements
- Fire, first-aid and emergency arrangements
- Any Health and Safety matters raised by employee representatives
- Legislation changes
- Any other business relevant to health and safety matters.

The Health and Safety Manager / Director shall be responsible for the operation of the Health and Safety Committee and normally chair the meeting with the input of the Safety Representatives.

The elected person responsible for arranging Committee meetings is:

Matthew Gilroy

ENGLISH AS A SECOND LANGUAGE

The Health and Safety at Work etc. Act 1974 and **The Management of Health and Safety at Work Regulations 1999** require Conviron Europe Ltd to provide its employees with understandable and relevant information on risks to their health and safety and on precautions to take to avoid those risks. Information shall be provided in a way that takes account of any language difficulties or disabilities.

It will be provided in a form that is most suitable in the circumstances, as long as it can be understood by everyone. For employees or workers with little or no understanding of spoken or written English, special arrangements will be made.

Where workers do not speak or read English, effective arrangements are established, such as a translator or translated or graphic documents and signs, to successfully communicate our requirements, particularly for health and safety. Where the use of safety signs and signals are necessary, within the workplace, changes will be made where necessary.

Managers will consider the ability of their employees to understand information, instructions, and training on Health and Safety which is provided in the English language, and take steps to ensure they can understand.

The person responsible for ensuring that employees with little understanding of English are given suitable information, instructions, training and supervision is:

Matthew Gilroy

Site Work

We also recognise that at some work locations our employees and sub-contractors may be working alongside people for whom English is not their main language. We recognise that such circumstances can create significant additional safety issues.

Mitigating these issues is a shared responsibility involving;

- The person responsible for the site making contractors etc. aware that there may be language issues within the site/premises,
- Contractors ensuring that their operatives recognise the need not to rely on spoken/written English as being wholly effective (A shouted warning may not be understood). Operatives must be aware of the need to pause their work if someone approaches them and to guide them away from any hazards.

As far as is reasonably practicable, as a contractor, we will endeavour to use pictorial signs to indicate safety issues associated with our work.

ALCOHOL, DRUGS AND SUBSTANCE MISUSE

Substance abuse, or impairment due to drugs and/or alcohol, is a major factor in causing accidents at work. Conviron Europe Ltd aims to eliminate this factor and ensure the safe and efficient running of the organisation free from the risks caused by drugs, substances and alcohol as we feel this is a fundamental right of your employment. This can only be achieved with everyone's co-operation.

Under **Section 7 of the Health and Safety at Work etc. Act 1974** employees have a legal duty to take reasonable care for the health and safety of themselves and other persons who may be affected by their acts or omissions at work. This includes ensuring employees take individual responsibility and do not present themselves for work whilst under the influence of alcohol, drugs or other substances which are detrimental to the safe and efficient running of the organisation.

Drug Misuse or Abuse and Medication on the Premises

If you misuse drugs or any intoxicating substances during working hours or on our premises, in our vehicles or on the premises of our clients, you will be committing an act of gross misconduct and will thus render you likely to be summarily dismissed. The same will apply to you if it is believed you are in possession of, or buying or selling of any illegal drugs or intoxicating substances during working hours or on our premises, in our vehicles or on the premises of our clients.

Drug misuse is defined as any controlled drug under the Misuse of Drugs Act 1971 that is not possessed or used under the terms of a prescription and under advice from a Doctor, and the misuse of any drug obtained over the counter at a pharmacy, general retail medication or the use of any intoxicating substance that includes 'legal highs' and novel psychoactive substances.

Intoxicated Employees

If alcohol or drugs intoxicate an employee during working hours or on our premises, in our vehicles or on the premises of our clients except where authorised, arrangements will be made for the employee to be escorted from the premises immediately and they may be requested to undertake a test for drugs, alcohol or both at the request of a manager.

By "intoxicate" we mean that any drug is found in your urine that is above the European Workplace Drug Testing Guidelines, that you have alcohol in your breath above 22 micrograms, that you have alcohol in your blood above 50 micrograms or that you have levels reported as positive from any UKAS accredited laboratory in any sample test. For absolute clarity, by "intoxicate" we mean the levels in your sample and in no way does this relate to your mental state or the influence alcohol or drugs are having on you.

Where you are found to be intoxicated as per the definition above, you will be immediately suspended from work. You will be escorted from the premises and your emergency contacts will be notified so that they can arrange for you to return home. This kind of behaviour will normally be treated as gross misconduct and likely to result in dismissal.

Consumption of Alcohol on the Premises

Unless authorised by management, you are expressly forbidden to consume alcohol when at work, or bring it on to our premises, in our vehicles or on the premises of our clients under any circumstances. Any breach of this rule will be treated as gross misconduct and is likely to result in summary dismissal.

Driving and use of Company Vehicles

Convion Europe Ltd will adopt a zero tolerance policy to people driving vehicles above the appropriate breath alcohol level, as determined by legislation.

If any type of prescribed medication is used at work or prior to commencing work and it is believed that the negative effects of the medication could still present themselves, employees must make their manager/supervisor aware of this fact.

Testing

We reserve the right to request that you comply with reasonable suspicion testing. This is where a senior or trained manager believes that you may be intoxicated as per the definition above. We believe that such a request is a reasonable managerial instruction. We may request that you submit to reasonable suspicion testing when we feel you are intoxicated and are present at our sites, the sites of our clients or engaged in activities in any other location for the purposes of your employment with us. You may also be requested to submit to reasonable suspicion testing at the request of our clients or third parties e.g. the Health and Safety Executive.

Employee Support

The taking of drugs, alcohol and substance misuse over an extended period can be habit forming and lead to dependence. Dependence is recognised as an illness by Convion Europe Ltd and any employee who believes that they may have, or potentially have, such a problem, is encouraged to discuss it with their manager/supervisor, or a person in authority with whom the individual feels comfortable.

You are encouraged not to cover up for employees with a drink or drug problem but to recognise that collusion represents a false sense of loyalty and will in the longer term damage those employees.

Convion Europe Ltd will provide support and advice on obtaining appropriate treatment and guidance for employees who may be affected by drugs, alcohol or substance misuse. The employee is expected to meet the cost of any treatment but Convion Europe Ltd will be supportive and understanding during treatment.

Each employee is responsible for complying with the above, and their manager/supervisor is responsible for checking compliance.

This policy has been designed to ensure that you are aware of your rights and duties regarding drugs and alcohol when you are at work and this policy is designed to protect you, your colleagues and third parties. This need to work without impairment is equally important whether working within Convion Europe Ltd own premises or on a third party's site, and at any time when representing Convion Europe Ltd.

Further information and support regarding drugs, alcohol or substance misuse may be obtained from the HR department and specialised advice, support and/or guidance may be obtained from external Occupational Health providers, NHS or the employee's General Practitioner.

Employees should ensure they have read and understood the information contained in the 'Employee Handbook' concerning Alcohol, Drug and Substance misuse.

CONTROL AND SELECTION OF CONTRACTORS

All workplaces use contractors from time to time for example electricians, window cleaners, painters, and decorators, plumbers and other trades persons. These will be controlled so far as reasonably practicable, so that they work in a safe manner and do not cause any employee and other visitors to be at risk from their work activities.

Convion Europe Ltd recognises the importance of flexibility when engaging contractors which will vary according to the nature/size of the job, the risks involved and the urgency of the work undertaken including any emergency situations. Where it is reasonably practicable all contractors will be assessed prior to commencement of the job and Convion Europe Ltd must ensure all contractors are deemed competent to undertake the task they have been employed to do.

Prior to any contractor carrying out any large scale building works or high risk work activity at our business premises or elsewhere on our behalf, the contractor must produce the following:

- A copy of their current Employer and Public liability insurance.
- Copies of any accreditations applicable to the job they may have.
- Copies of any risk assessments, method statements and CoSHH assessments.
- Any other information that may affect the health and safety of anybody involved.

The person responsible for the selection and control of contractors is:

Matthew Gilroy

Convion Europe Ltd understand that contractors may be at risk from hazards that may arise as a result of our business activities. Convion Europe Ltd will provide contractors with such information, instruction as required to ensure their health and safety and to assist them in complying with their obligations, including any relevant information concerning specific hazards and risk on site, site rules and procedures including first aid and emergency arrangements.

Convion Europe Ltd will take account of the possible presence of visitors and contractors when developing, implementing and practising fire and other emergency procedures.

All contractors must report immediately any accidents or incidents resulting in injury or damage to Convion Europe Ltd. Convion Europe Ltd will record all accidents and incidents in order to comply with their legal reporting requirements under RIDDOR.

Contractors will only be able to subcontract any part of the works to a third party with the express permission of Convion Europe Ltd and will ensure that all such sub-contractors are suitably competent.

Risk assessments and method statements will be prepared where necessary and the control measures identified will be monitored by Convion Europe Ltd to ensure that they are being complied with. Certain high-risk tasks will be controlled by the use of a permit to work system administered by Convion Europe Ltd. Non-compliance with agreed standards may result in suspension of the work and removal from site.

Where necessary, arrangements will be put in place to ensure that all contractors and sub-contractors have received adequate health and safety induction training and are properly supervised when on site.

Continuous improvement in the management of contractors on our site will be achieved by regular supervision when contractors are on site and reviewing the performance of each contractor during the contracts work and at the end of the job.

CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH

The **Control of Substances Hazardous to Health Regulations 2002 (as Amended) (CoSHH)** require Convion Europe Ltd to carry out an assessment and record the risks involved with using, storing and handling hazardous substances including chemicals.

Hazardous substances will not be used handled or stored until a suitable and sufficient risk assessment has been carried out under the CoSHH Regulations. The findings and content of the CoSHH risk assessment will be communicated to all employees likely to come into contact with the hazardous substance.

Safety data sheets (SDS) will be obtained for all hazardous substances purchased and this information will be retained and used when compiling CoSHH assessments. We understand these data sheets are freely available from suppliers and manufacturers who have a legal obligation to provide them and should be kept with the completed CoSHH assessments.

We also recognise that as a result of our business undertaking hazardous substances including dust, fumes, mist and vapours may develop as a result of our business practices. These substances will also be assessed and controlled and CoSHH assessments undertaken.

The person responsible for ensuring that the CoSHH assessments are carried out is:

Matthew Gilroy

After reading and understanding the content of the CoSHH assessments the employee will either sign the CoSHH assessment or the confirmation sheet to confirm that they have read and understood the assessment and its findings.

Responsibility for implementation of CoSHH assessments and any controls that are required rests with the nominated person identified above and supported by any other employees as is required.

The manager / supervisor will monitor the effectiveness of the CoSHH assessment and any deficiencies will be reported to the person responsible for carrying out the CoSHH assessments.

All CoSHH assessments will be reviewed annually or if there are any significant changes that affect the validity of the CoSHH risk assessment, whichever comes sooner.

DISPLAY SCREEN EQUIPMENT (DSE)

The **Health and Safety (Display Screen Equipment) Regulations 1992** require that an assessment of all display screen equipment (DSE) and the workstation be carried out to identify any risks present to identified users as defined under the DSE regulations.

Convion Europe Ltd recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes ensuring the safe use of Display Screen Equipment / Visual Display Units often referred to as (DSE) by identified users.

Convion Europe Ltd will ensure that the risks to the health and safety of our employees from the use of display screen equipment are adequately controlled by means of carrying out workstation assessments. All users will be identified and workstations assessed to ensure that they meet the requirements of the Regulations.

Workstation assessments will take place as part of the new employee induction programme, on the introduction of new DSE or on the movement or change of location / workstation of DSE and any significant change concerning individual user's capability. Assessments may be carried out by the individual user or colleagues using the appropriate self-assessment format with adequate information, instruction and training provided by Convion Europe Ltd.

It is the responsibility of the employee's manager/supervisor to ensure that employees understand this responsibility and have undertaken their own workstation assessment.

The person responsible for ensuring workstation assessment of display screen equipment has been completed is:

Matthew Gilroy

Workstation assessments will normally be reviewed every two years and appropriate records will be kept. Where the assessments reveal equipment or other issues that do not meet the minimum legal requirements, employees must take appropriate action to notify such matters via their manager/supervisor including any changes in individual capability.

Eyesight Tests and Corrective Glasses

Convion Europe Ltd has a policy of paying the reasonable costs of eye and eyesight tests by a qualified optician for all identified DSE users. Should an employee have difficulty with their eyesight whilst using the display screen for their work, then we will pay for an eyesight test. This will determine if the employee requires corrective glasses to reduce the health risks involved in the use of computer screens.

All identified DSE users will be entitled for tests to be repeated at intervals as recommended by the optician. Convion Europe Ltd will also pay the reasonable costs of providing users with spectacles or corrective eyewear required for DSE use, where found to be necessary.

If corrective eyewear is required then we will provide basic eyewear, which must be used whilst the operative is using the computer. Convion Europe Ltd will not pay for any other type of eyewear, such as bi focal or vari-focal if an employee requires these then they must pay the cost difference.

Employees should speak to their manager/supervisor prior to undertaking any eyesight test and/or purchasing corrective eyewear or spectacles.

DRIVING AND USE OF VEHICLES

The road transport safety of our employees is important to Conviron Europe Ltd. To ensure that vehicles and users are safe at all times Conviron Europe Ltd will carry out risk assessments to ensure that the correct controls and safeguards are put in place.

It is the policy of Conviron Europe Ltd that:

- Only authorised employees will be allowed to drive company vehicles.
- All drivers must be legally entitled to drive in the UK will hold appropriate driving license
- All Employees must report any ill health which may impair their driving abilities; road traffic accidents and any fines and driving endorsements received to their manager/supervisor.
- All vehicles will have a valid Road Fund License and current MOT certificate if required.
- All Employees who use their own vehicles for company business must ensure servicing is carried out in accordance with manufacturer's guidelines.
- All Employees who drive vehicles whether privately owned or leased are responsible for ensuring their vehicles are fully roadworthy in accordance with UK legislation.
- Privately owned vehicles may only be used on company business if covered by fully comprehensive insurance covering Social, Domestic, Pleasure and Business use.
- Privately owned vehicles used for company business must have all the relevant documentation and copies given to the manager/supervisor prior to commencement of employment and thereafter at least annually.
- Employees responsible for company vehicles must fill in a weekly check sheet and report any defects immediately to their manager/supervisor.

The person responsible for ensuring that the risk assessment is carried out is:

Matthew Gilroy

The rules and assessments will be reviewed annually or if any significant change takes place.

Mobile phones

It is an offence under the **Road Traffic Act** to use a hand held mobile phone whilst driving this includes waiting at traffic lights and in traffic queues.

Conviron Europe Ltd will not place pressure on any employee to use the phone whilst driving. Therefore Conviron Europe Ltd cannot be held responsible for any employee who is prosecuted for this offence. Before answering the phone the driver must pull over and park in a safe place. The use of call divert to voice mail is encouraged or the use of the answering machine. The text message service is not to be used whilst driving. Failure to comply with this rule may lead to disciplinary action.

Further information concerning driving and the safe use of vehicles are provided in the Employee Vehicle Handbook.

ELECTRICAL SAFETY

Under **The Electricity at Work Regulations 1989**, the employer is required to install, maintain and prevent any dangers from electrical items, including both fixed and portable electrical systems to employees and others that may be affected by the companies work activities.

Convion Europe Ltd recognises that it has a responsibility to provide a safe and healthy working environment for its employees, contractors, visitors and any other persons affected by our undertaking and acknowledges that this includes ensuring the provision, use and maintenance of safe electrical installations and equipment.

Convion Europe Ltd shall be responsible for the following:

- The fixed mains installation is installed, inspected and routinely tested by a competent person in accordance with the IET Wiring Regulations 18th Edition and relevant British Standards.
- Work on electrical systems is only carried out by competent persons following safe systems of Work. Live working is not carried out on company premises unless a 'Permit to Work' system is in place and the criteria in the Electricity at Work Regulations are met.
- Safe access is provided for competent persons (both in-house and external) for maintaining electrical systems or work equipment.
- Portable electrical equipment is inspected for safety prior to first issue. Routine combined inspection and testing is undertaken at intervals recommended by a competent person according to the type of use.
- Routine combined inspection (PAT Testing) and an inventory of portable electrical equipment which is owned by Convion Europe Ltd is compiled covering all workplaces and equipment under Convion Europe Ltd control.
- Each Employee is instructed to carry out simple checks of electrical equipment prior to each use for visible defects and signs of damage.
- Employees are instructed to report damaged, defective equipment or dangerous conditions to their manager/supervisor.
- Employees will ensure that their workplace and work equipment is kept in a clean and tidy condition, items and equipment must not be left on the floor to present a trip, slip or fall hazard and any cables are tucked away or routed away from traffic routes.
- Employees must not use privately owned electrical equipment in the workplace without authorisation from their manager/supervisor and the item PAT tested prior to use.

The person responsible for ensuring electrical installations are inspected is:

Matthew Gilroy

Any electrical defects must be reported to:

Matthew Gilroy

FIRE SAFETY

Conviron Europe Ltd recognises the continual risk of fire to our premises, whether caused by accident or by malicious intent. **Under the Regulatory Reform (Fire Safety) Order 2005** and the **Management of Health and Safety at Work Regulations 1999** employers are required to undertake a specific risk assessment of the risks posed by fire within their businesses undertaking.

Conviron Europe Ltd will undertake a fire risk assessment to ensure that we provide and maintain such precautions as are necessary to safeguard those who use our workplace. We will identify those persons who might be especially at risk in case of a fire and provide information, instruction and training for all employees about the fire precautions in our workplace.

We will produce an emergency plan and nominate and train specific employees to undertake special roles under the plan. We will consult our employees about all aspects of fire safety and ensure that we co-operate with other employers at our premises where necessary. All visitors to the premises are made aware of the fire rules and procedures relevant to the building.

Contractors are informed of fire procedures and will be asked for information on how they intend to control any fire hazards associated with their work, including 'Permit to Work' for any hot works.

Sources of ignition will be controlled effectively and all flammable liquids and gases will be stored safely, flammable liquids will be kept in a flameproof locker and compressed gases will be stored away from sources of heat, fuel and ignition. Only minimum quantities of flammable liquids and gases will be allowed in the working area and any excess stock returned to the storage area or flameproof locker. Dangerous substances will only be used as set out in specific risk assessments ensuring there are adequate precautions against fire and explosion.

The person responsible for arranging to carry out the fire risk assessment is:

Matthew Gilroy

The fire risk assessment will be reviewed at least annually, or if there is any significant change in the circumstances.

All fire extinguishers are inspected by a competent person annually and must be replaced when discharged. The competent person for arranging fire extinguisher inspection is:

Matthew Gilroy

Fire safety checks including emergency exits, evacuation routes, fire extinguishers and condition of fire doors will be checked at monthly intervals. The person responsible is:

Matthew Gilroy

The assembly point is situated at:

Car Park – Front of Building

The fire alarm call points will be tested weekly and any defects found reported and repaired. The person responsible for this is:

Matthew Gilroy

Fire Safety Continued

The emergency lighting will be tested monthly and any defects found reported and repaired. The person responsible for this is:

Matthew Gilroy

The person responsible for carrying out the evacuation practice and tests then recording the results is:

Matthew Gilroy

The fire marshals are:

David Dixon

A roll call will be carried out to ensure that all people are present. The roll calls coordinators are:

Benjamin Fidgett

The Fire Procedure is as follows:

If you discover a fire:

- Raise the alarm by the recognised method.
- Call the Fire Brigade immediately by telephone.
- Give the operator the contact telephone number.
- Only tackle the fire if trained to do so, with the equipment provided.
- Ensure your exit is clear at all times and do not take personal risks.

When speaking to the Fire Brigade provide the following information:

- We have a fire at Conviron Europe Ltd and give the operator the full address.
- Do not replace the receiver until the Fire Brigade has repeated the address.
- Call the Fire Brigade immediately to every fire or on suspicion of a fire.

Upon hearing the recognised alarm:

- Evacuate the building by the nearest available emergency exit.
- Move towards the designated fire assembly point.
- The fire roll call coordinator will inform the fire service of any missing persons.
- Do not stop to collect personal belongings.
- Do not re-enter the building until the Senior Fire Officer informs you it is safe to do so.

* * *

FIRST AID

The **Health and Safety (First Aid) Regulations 1981** requires us to provide adequate first aid equipment and a sufficient number trained people to administer first aid when required.

Convion Europe Ltd will carry out a first aid risk assessment; this will enable us to establish the number of trained first aid person/s we require as well as the amount of first aid equipment needed.

Degree of Hazard associated with your work activities	Employees on site	What First-Aid personnel do I need?
Low Hazard (e.g. Offices, shops, etc.)	Below 25	At least one appointed person
	25-50	At least one first-aider trained in EFAW
	50 or More	At least one first-aider trained in EFAW for every 100 employed (or part thereof)

The person responsible for

Factors considered will be:

- The number of people involved.
- The level of risk that our business activity presents (low, medium or high risk).
- The proximity of our business to professional medical help (e.g. rural or town centre that may affect the speed at which the paramedics will arrive).
- Any other issues that may affect the assessment.

The qualified first aid people or appointed persons are:

David Dixon & Ben Fidgett

The first aid boxes are located at:

First Floor in the Employee Refreshment Area

All accidents are to be reported and entered in the accident book, which is located in:

Managers Office

All accidents or near misses will be investigated and remedial actions identified this will prevent reoccurrence of the same or similar incidents. The level of investigation will depend upon the seriousness of the accident.

The person responsible for investigation of accidents or near misses is:

Matthew Gilroy & David Dixon

HOME / REMOTE WORKING

Conviron Europe Ltd recognise the importance of ensuring that all home and remote working activities are identified and managed appropriately to minimise the risks to both the employer and employee. The health, safety and welfare of home and remote workers who are contracted or routinely work from home or away from their normal place of work will be carefully considered with the aim to provide the same levels of protection as employees who work on-site so far as reasonably practicable.

Home working and remote working offers many advantages to both the employer and employee, but it also brings its own health and safety hazards. Common hazards associated with home and remote workers include working in isolation, stress and mental well-being, lone working, use of computers, work equipment, fire, manual handling, and a lack of control over the working environment.

Due to the many activities and hazards which may arise from working at home or remotely, this Policy should not be read and acted upon in isolation, but cross referenced to other relevant sections within this Policy including the section on Lone Working and Display Screen Equipment.

All employees who are contracted or routinely work at home or remotely shall discuss the health and safety risks of doing so with their manager/supervisor prior to the introduction of home or remote working. Employees must co-operate with management to enable them to comply with their health and safety duties in respect of home and remote working.

The risks associated with home and remote working will be managed through the following means:

- Risk assessments will be carried out for all home and remote working activities. This will establish the degree of risk and allow the employee and their manager/supervisor to put in place the control measures required to reduce the risk to an acceptable level.
- Employees working from home must have suitable communication equipment to enable employees to be communicated with at suitable intervals (the degree of risk determines what constitutes a suitable interval).
- Only competent and authorised persons will be permitted to work at home or remotely.
- Training and/or information and instruction will be provided following the satisfactory completion of a suitable and sufficient risk assessment and home working checklist for employees who are contracted or routinely work from home.
- Checks will be made to ensure that any home or remote workers have no medical condition which makes them unsuitable for home or remote working.
- Procedures will be put in place to monitor home and remote workers to ensure they remain safe.

The person responsible for ensuring that all of the above steps are taken is the employee's manager/supervisor:

Matthew Gilroy

Home / Remote working risk assessments will be reviewed annually and appropriate records will be kept. Employees must take appropriate action to notify their manager/supervisor on any such matters which may affect their ability to work safely when away from Convicon Europe Ltd head office.

LONE WORKING

Convion Europe Ltd recognises the importance of ensuring that all regular and planned lone working activities are managed appropriately to minimise risk to ensure the safety of lone workers as far as reasonably practicable. Convion Europe Ltd legal obligation to ensure the safety of lone workers does not differ much from that of the responsibility to ensure the safety of employees working in a group or under close supervision within the workplace.

All employees likely to work alone on a regular basis shall be identified by their manager/supervisor and consulted with prior to the introduction of lone working. Employees must co-operate with their manager/supervisor to enable them to comply with their health and safety duties in respect of lone working. Employees must take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions when working.

The risks associated with lone working will be managed through the following means:

- Risk assessments will be carried out for all regular and planned lone working activities. This will establish the degree of risk and allow the employee and their manager/supervisor to put in place the control measures required to reduce the risk to an acceptable level.
- Employees who are lone working must have suitable communication equipment to enable employees to be communicated with at suitable intervals (the degree of risk determines what constitutes a suitable interval).
- Only competent and authorised persons will be permitted to work alone. Training and/or information and instruction will be provided following the satisfactory completion of a suitable and sufficient risk assessment.
- Checks will be made to ensure that any lone workers have no medical condition which makes them unsuitable for lone working.
- Procedures will be put in place to monitor lone workers to ensure they remain safe.
- Managers must regularly review and, where necessary, modify risk assessments, especially where there is reason to suspect that they are no longer valid or there has been a significant change in the work to which the assessment relates.

Whether or not a person will be permitted to work alone in or out of normal hours, will depend on the degree of risk posed by the work, the working environment and on the individual.

The person responsible for ensuring that all of the above steps are taken is the employee's manager/supervisor:

Matthew Gilroy

Lone Working risk assessments will be reviewed annually and appropriate records will be kept. Employees must take appropriate action to notify their manager/supervisor on any such matters which may affect their ability to work safely when working alone.

MANUAL HANDLING

The **Manual Handling Operations Regulations 1992 (as amended)** require that all significant manual handling tasks must be avoided where reasonably practicable, where this is not reasonably practicable then Conviron Europe Ltd will ensure an assessment of the risks to employees will be carried out. The manual handling assessments will be made available to all relevant employees.

Where significant manual handling activities fall outside the recommended guidance weights (as defined under the Approved Codes of Practice), and cannot be avoided by elimination, mechanisation or automation, manual handling assessments will be conducted by Conviron Europe Ltd. The manager/supervisor will identify those areas / tasks which require further in-depth specific manual handling assessments.

In-depth manual handling assessments are undertaken for those tasks that pose a significant risk such that they cannot be eliminated or mechanised. Risks are further reduced by using safe systems of work, training and/or information and instruction given to employees prior to undertaking any significant manual handling activities.

The person responsible for ensuring that the manual handling assessments are carried out is:

Matthew Gilroy

Manual Handling assessments will be recorded, maintained and reviewed on a regular basis to ensure compliance with current legislation and best practice, normally annually. After reading and understanding the manual handling assessment, the employee should either sign the task specific manual-handling assessment or the confirmation sheet.

It is not possible to carry out an assessment for all minor manual handling activities / tasks; therefore it is the responsibility of employees to mentally assess the risk of harm to themselves and others before carrying out manual handling.

Employees must not undertake any manual handling activities without first receiving the appropriate manual handling training and/or information and instruction including any safe systems of work provided by Conviron Europe Ltd on safe lifting techniques.

Before carrying out any manual-handling task employees must consider:

The Task - What you are going to do

The Individual – The persons own capabilities

The Load - The weight, size and shape of the load

The Environment – The environment to which the task is being undertaken

If in doubt get help and do not lift

Responsibility for implementation of manual handling assessments and any controls that are required rests with the nominated person above, supported by any other employees as required.

MACHINERY SAFETY

Conviron Europe Ltd will take all reasonable and practicable steps to comply with the **Provision and Use of Work Equipment' Regulations 1988** and all relevant health and safety legislation ensuring all equipment, machinery and plant used for work is suitable for the task and fit for purpose and operators are competent to use the machinery/work equipment. Conviron Europe Ltd will ensure suitable and sufficient risk assessments are undertaken and draw up a comprehensive set of safe working procedures for all hazardous equipment and machinery.

All hazardous machinery should have a specific risk assessment, this should include:

- Type of machine, serial number, location of machine
- General condition of machine/tools and condition of guards and emergency stops
- Tripping devices, electrical cable and terminations, Isolation arrangements, on/off buttons
- Maintenance procedures, pre-user and guard checks, statutory inspections
- Training and competency of operators, personal protective equipment requirements
- Identify hazards, who is at risk, control measures and monitoring and review procedures

The manager/supervisor should go through the risk assessment and safe working procedure with each operator and retain records. A suitable safe working procedure should be produced and either held on file, or preferably displayed adjacent to each machine/work equipment.

Conviron Europe Ltd will ensure:

- All employees will be trained, skilled and/or competent to use machinery/work equipment.
- All machine guards will be provided and correctly positioned when using the machines.
- Suitable emergency stops should be provided at each machine so that, if used, are failsafe.
- Suitable eye protection provided and signs displayed in areas where this is mandatory.
- The abrasive wheels must only be changed by employees who have been trained on how to mount an abrasive wheel correctly. Training should be recorded in a suitable register.
- Machines that are found faulty should not be used until satisfactory repair is completed. Signs should be displayed on the machine to warn of the danger.
- A suitable 'Isolation and Lock Off' procedure shall be put into place for all forms of energy to be fully isolated, locked off where necessary and labelled before maintenance work.

Machinery Guard Checks and Pre-User Checks

To ensure the safe operation of any machinery or work equipment and where the risk assessment indicates, a procedure will be in place for the routine checking and inspection of all the machinery guards and interlocks. The functionality of any interlocks and guards should be monitored and also checked to ensure they remain operational, have not been by-passed and stop machinery or access to dangerous moving parts within an appropriate timescale, check should include:

The electrical terminations are in good order, on/off electrical buttons are not damaged and work. The areas around the machines are clean with no slips and trip hazards present and adequate lighting and suitable ventilation including any LEV is in place and working. There are no exposed rotating parts whilst the machine is in operation and the guards are clean, set and/or correctly adjusted and suitable for use, the machinery is in good condition with no obvious defects. All pre-user inspections are recorded and records retained

The person responsible for the work equipment and machinery safety is:

Matthew Gilroy

PERSONAL PROTECTIVE EQUIPMENT

The **Personal Protective Equipment (PPE) Regulations 1992** requires employees to be provided with personal protective equipment (PPE) for employees where a risk assessment indicates there is a requirement. Conviron Europe Ltd will ensure any personal protection equipment provided will be suitable for the task affording the necessary protection to employees.

Conviron Europe Ltd will only specify personal protective equipment as a means of last defence should it be unable to eliminate the risk to employees through other control measures. Conviron Europe Ltd will as far as is reasonably practicable implement the hierarchy of control measures. Personal protective equipment will only be provided if the risk to employees cannot be adequately controlled after the hierarchy of control measures has been exhausted.

Conviron Europe Ltd will ensure an assessment of personal protective equipment will be carried out and where a need is identified, the equipment will be provided at no cost to the user. Employees will be consulted on the type of personal protective equipment to be used and given adequate and sufficient information, instruction and guidance on the use, storage and maintenance of such equipment.

Suitable and sufficient facilities will be provided to enable employees to store any PPE provided to them whilst not in use.

The manager/supervisor of any employees issued with PPE shall ensure that the use of PPE is recorded and records maintained.

Where it is identified that an employee's well-being may be affected due to exposure to a specific hazard or hazards, a medical questionnaire will be completed. Conviron Europe Ltd will ensure where necessary regular health surveillance is provided where the risk of harm to employees is controlled by the use of personal protective equipment.

Where PPE is supplied then employees must use the equipment provided; this is a legal requirement under the **Health and Safety at Work etc. Act 1974 section 7**.

The person responsible for the assessment and provision of PPE is:

Matthew Gilroy

Any questions or complaints (e.g. discomfort) about the PPE provided should be directed to:

Matthew Gilroy

PREGNANCY AND NURSING MOTHERS

It is important to Conviron Europe Ltd that the health, safety and welfare of all our employees is safeguarded. We recognise our responsibilities under the **Management of Health and Safety Regulations 1999 Regulation 16** and realise that if any of our employees become pregnant they must inform their manager/supervisor immediately. This can be verbally but must be followed up by a written confirmation from their doctor.

Following written confirmation from the employees doctor, the manager/supervisor will carry out an individual specific risk assessment of the work that the employee does for Conviron Europe Ltd to determine any risks to her and her unborn baby that may arise from the work activities.

The person responsible for ensuring that the risk assessment is carried out is:

Matthew Gilroy

Where any aspect of work could involve risk to the health and safety of a new or expectant mother or to that of her baby, the risk assessments will identify any additional precautionary measures. Once notified in writing that an employee is pregnant, has given birth within the previous six months, or is breast-feeding, appropriate action will be taken.

However, where further action will not avoid risk, and if reasonable to do so, Conviron Europe Ltd will alter the working conditions or hours of work, or; offer her suitable alternative work if available. Advice should also be sought from the HR Department.

Pregnant employees must not:

- Carry out manual handling tasks (Lifting and Carrying).
- Use or come into contact with any hazardous substances.
- Work at height (stand on stepladders, step ups etc).

Pregnant employees must:

- Work to the controls put in place by the risk assessment.
- Inform their line manager/supervisor of any problems or changes that may occur during their pregnancy so that the risk assessment can be reviewed.

To maintain a safe working environment for any pregnant employees or nursing mothers, a suitable rest area will be provided for them to rest if required. Seating will be provided for the employee to carry out their work where appropriate.

REPORTING OF INJURIES DISEASES AND DANGEROUS OCCURRENCES (RIDDOR) REGULATIONS 1995 (AMENDED 2013)

Under these regulations specific work related accidents, diseases, and dangerous occurrences must be reported to the Enforcing Authorities. The method of reporting is through the **Incident Contact Centre (ICC)**.

Although there is a comprehensive list of reportable situations within the regulations the main incidents that must be reported are:

- Fatalities –These must be report as soon as possible by the quickest method possible, usually by telephone.
- Specified injuries such as major fracture, amputation, loss of sight etc.
- Injuries that causes the employee to be away from his/her normal work activity for more than seven days incapacitation (not counting the day on which the accident happened) incapacitation means that the worker is absent or is unable to do work that they would reasonable be expected to do as part of their normal work.
- Any incident that leads to a member of the public being taken to hospital by any means.
- Diseases
- Dangerous Occurrences

You only have to report injuries that lead to a worker being incapacitated for **more than seven consecutive days** as the result of an occupational accident or injury (not counting the day of the accident but including weekends and rest days). The report must be made within 15 days of the accident.

The person responsible for reporting incidents is:

Matthew Gilroy

You must still keep a record of the accident if the worker has been incapacitated **for more than three consecutive days**. If you are an employer, who must keep an accident book under the Social Security (Claims and Payments) Regulations 1979, that record can be treated as a record for the purposes of RIDDOR.

The record must include information such as:

- The name and occupation of the injured person or those involved in the incident.
- The status of the injured person (employee or visitor/contractor).
- The location of the incident.
- A brief description of the incident or disease.
- The date, time and method of reporting.

Incidents and diseases can be reported by the following methods:

Go to www.hse.gov.uk/riddor and complete the appropriate online report form. The form will then be submitted directly to the RIDDOR database. You will receive a copy for your records.

All incidents can be reported online but a telephone service remains for reporting **fatal and specified injuries only**. Call the Incident Contact Centre on 0845 300 9923 (opening hours Monday to Friday 8.30 am to 5 pm).

RISK MANAGEMENT

Conviron Europe Ltd will examine all workplaces and activities under its control to assess the significant risks to the health and safety of employees and others who may be adversely affected by its activities and ensure significant risks are controlled and managed so far as is reasonably practicable.

Conviron Europe Ltd will institute a programme of hazard identification and risk assessment of all regular and standard work activities in order to eliminate, reduce or control hazards and risks, so far as is reasonably practicable to employees or other affected persons.

Conviron Europe Ltd will apply the principles of risk prevention (detailed in the relevant Regulations) to all assessments and ensure that effective arrangements are in place for the planning, organisation, control, monitoring and review of the preventive and protective measures.

Conviron Europe Ltd will ensure that all of our staff are competent to undertake their duties and are provided with appropriate information, instruction and training concerning undertaking risk assessments.

Specific assessments of the risks to new and expectant mothers, young persons and vulnerable persons will be carried out when required and suitable arrangements will be implemented as necessary.

Where necessary, specific risk assessments will be made under the relevant legislation which may include, Display Screen Equipment, Provision and Use of Work Equipment, Control of Substances Hazardous to Health, Fire, First-Aid, Manual Handling, Personal Protective Equipment, Noise, Hand Arm Vibration. Further details are contained in the relevant sections of the policy.

Conviron Europe Ltd will ensure that we carry out suitable and sufficient risk assessments of all the tasks and equipment connected with our business activities that are likely to present a significant risk of injury or ill health to our employees or others within our activities and procedures are in place for serious and imminent danger.

The person/s responsible for ensuring that risk assessments are undertaken is:

Matthew Gilroy

The risk assessments will be made available to all relevant employees who may be affected by the work activities who will read them. After reading and understanding the content of the risk assessment, the employee must sign the risk assessments or the confirmation sheet to confirm that they have read and understood the assessment and its findings.

The responsibility for the implementation of risk assessments and any controls that are required rests with the nominated person identified above and shall be supported by any other employees as required.

Managers or supervisors will also monitor the effectiveness of any actions resulting from the findings of the risk assessments. Any deficiencies that are identified will be reported to the person responsible for carrying out the risk assessments.

All risk assessments will be reviewed annually as a minimum or if there has been an accident or near miss and after any significant change that affects the validity of the risk assessment, whichever comes sooner.

SAFETY SIGNS

The **Health and Safety (Safety Signs and Signals) Regulations 1996** set out the minimum requirements concerning safety signs and signals at work, employers must indicate areas of risk by displaying signage, which incorporates a pictorial sign and are displayed in the relevant locations to warn people of any danger. Conviron Europe Ltd will ensure an assessment will be made of the safety sign requirements for the premises and suitable signage will be displayed where required.

There are four main types of safety signage under these regulations these are:

- | | |
|-------------------------------------|------------------------|
| • Red Prohibition Signs | No Smoking |
| • Yellow Hazard Signs | Caution Slippery Floor |
| • Blue Mandatory Signs | Fire Door Keep Shut |
| • Green Safe Condition Signs | First Aid Point |

Any barriers, notices or safety signs displayed on the premises are there for employee's safety, and should be complied with at all times.

Typical signage in the business may include the following:

- Electrical boxes must display signage that indicates the electric shock risk from contact with circuits in the box.
- Fragile roofs must be indicated with hazard signage.
- When there is a risk of contact with forklift trucks you must indicate the risk.
- Where there are slip, trip or fall risks within the premises position signage to raise people's awareness of the slip hazard present.
- Position signage on specific machinery to remind operatives that it is compulsory to wear PPE whilst operating the machine.
- Identify the areas that are restricted to authorised persons only, by means of prohibiting signage.
- In washing facilities where there is a risk of scalding injuries signage must be in place to indicate 'very hot water'.
- Position signage to ensure parents are made aware that their children must be supervised at all times.
- "Wear ear defenders" and "Wear dust masks" - when plant is running in the workshops.
- "Fire Action Notices" - to be displayed around the site.
- "No Smoking" signs on entrance to buildings, workshops and near fuel tanks.
- "Danger – Highly Flammable" sign to be placed on gas bottle storage areas.
- "Danger – Deep Water" signs should be placed at the pond area.
- A "Hazardous Chemicals" sign placed on the chemical storage area/ cupboard.
- Position "No Smoking" Signs in all your workplace areas and vehicles to inform employees and visitors that it is against the law to smoke.
- "First-Aid" location of first aid boxes and nominated first aiders on staff notice boards
- "Fire Safety" signage including assembly points, directional signage, alarm call points, types of fire extinguishers, fire action notices and any nominated fire marshals.

The person responsible for safety signage is:

Matthew Gilroy

SAFETY TRAINING

Conviron Europe Ltd recognises the duty under the **Health and Safety at Work etc. Act 1974**, to provide its employees with information, instruction, training and supervision so that they are competent and can carry out their job in a safe manner.

Information, Instruction, training and supervision may be carried out internally by managers/supervisors, by E-Learning or by external training providers using both informal and formal accredited training courses.

Conviron Europe Ltd will ensure that the capabilities of our employees and any future employees with regard to health and safety are taken into account when carrying out their work. Adequate health and safety training is provided for all employees on commencement of their employment and on their being exposed to new or increased risks. The training needs of all employees are assessed and formal training plans are documented.

To ensure this is carried out the person below has been appointed to identify any training needs:

Matthew Gilroy

The type of training provided by Conviron Europe Ltd will include:

- Health and Safety Induction training for all new employees
- Job/task specific training for all new employees or employees who transfer to other roles.
- Health and safety training for all employees that have been given specific tasks in the policy and to allow all employees to carry out their jobs safely.
- Extra training and/or supervision will be provided for 'Young People' because of their immaturity and lack of experience.

Refresher training will be provided where appropriate, be adapted to take into account new or changed risks to the health and safety of the employees concerned and any significant changes in legislation, this will take place during working hours.

Health and Safety Training may include:

- General Health and Safety Awareness
- Fire Safety and/or Fire Marshal
- Emergency First- Aid at Work and/or Three Day First-Aid Course
- Use of Display Screen Equipment
- Manual Handling when appropriate or identified by the risk assessment
- Risk Assessment / CoSHH Assessment
- Machinery Safety /Chemical Safety
- Use of Personal Protective Equipment (PPE and RPE) when issued
- Asbestos Awareness / Fork Lift Truck Driver Training

All training will be recorded and retained with the employee's personal file as the employee will sign to confirm that they have received the training and understood it.

The person responsible for maintaining the training records is:

Darren Masters

SMOKING AT WORK

Convion Europe Ltd recognises that it has both a moral and a legal duty to ensure, as far as is reasonably practicable, that employees, contractors, customers and visitors to Convion Europe Ltd have the right to work or visit without being exposed to tobacco smoke or fumes and vapours from e-cigarettes or vaporisers.

Chapter 28 of the Health Act 2006 is to make provision for the prohibition of smoking in certain premises, places and vehicles and therefore “Smoking” is not allowed in any of our workplaces or entrances where smoke can enter the building. No smoking signs are displayed in a prominent position at every entrance to the buildings.

This also applies where cigarette smoke can enter the building through a window. It is our policy to ensure that this legislation is fully applied and also includes our vehicles and therefore “Smoking” and the use of e-cigarettes and vaporisers is not allowed. In the event of a person smoking in the workplace areas, disciplinary action will be taken.

Smoking including the use of e-cigarettes and vaporisers will not be permitted in any vehicle provided by Convion Europe Ltd or private cars where the vehicle is occupied by more than one person whilst engaged on company business. The sign with the no smoking symbol will be displayed in each of Convion Europe Ltd vehicles.

E Cigarettes and Vaporisers, whilst Convion Europe Ltd acknowledges that e-cigarettes and vaporisers are not covered by the Health Act 2006, Convion Europe Ltd has made a decision to ban the use of e-cigarettes and vaporiser inside all buildings under the control of Convion Europe Ltd.

Where applicable designated no smoking shelters / areas have been provided for use by employees and visitors, where this is not possible then staff and visitors should not be permitted to smoke within ten metres of company owned buildings.

Employees, visitors and contractors who smoke or use e-cigarettes/ vaporisers are free to do so outside the building and not within ten metres of buildings under the control of Convion Europe Ltd.

The person responsible for implementing and monitoring the smoking policy is:

Matthew Gilroy

WASTE MANAGEMENT

The **Environmental Protection Act 1990** places a “Duty of Care” on producers of waste to ensure that it is disposed of correctly. The duty has 5 aspects:

- To prevent the keeping, treatment or disposal of waste without a licence.
- To prevent the escape of waste
- To transfer waste only to an authorised person.
- To ensure that there is clear labelling and information of the waste
- To retain documentary evidence.

To enable the premises to carry out this duty a written system and procedures for the identification, segregation, and disposal of waste is in place. The person responsible for the development and implementation of this system of waste management is:

Matthew Gilroy

There are two categories of waste produced by the premises, domestic waste and [special/controlled/clinical](#) waste.

Domestic waste will be collected and disposed of by:

Local Council

Special/Controlled/Clinical waste will be collected and disposed of by:

A properly licensed and authorised waste disposal agencies

Records of waste transfer will be kept in the Managers Office and a receipt must be obtained from the disposal agency on collection of the waste.

WELFARE

Convion Europe Ltd will provide welfare facilities in accordance with the requirements of the **Workplace (Health, Safety and Welfare) Regulations** as a minimum. Suitable and sufficient facilities will be provided, taking into account the number of people and the tasks or work they will be undertaking.

Convion Europe Ltd will ensure that all facilities provided are effectively maintained in a clean and orderly condition at all times and that they are suitable for the purpose for which they are intended. Any defects or damage to welfare facilities are repaired or replaced as necessary and all employees shall be provided with suitable information relating to welfare facilities.

Convion Europe Ltd will ensure so far as reasonably practicable that the following welfare facilities are provided for employees and taken into consideration when employees undertake any work whether on-site or off-site:

- There are provisions for wholesome drinking water and a means of consuming it including cups or drinking fountain.
- Arrangements are in place for heating food and providing adequate facilities for making hot drinks.
- Adequate numbers of tables and chairs are provided for persons to rest.
- Arrangements are in place to ensure adequate heating and ventilation of the workplace.
- Arrangements are in place for the adequate cleaning and maintenance of the premises including toilets, washing, changing and drying facilities.
- Sufficient sanitary and washing facilities are provided for the number of employees likely to be permanently occupying the premises.
- Adequate lighting and ventilation is provided and maintained throughout the premises.
- There is sufficient room and space available for each employee to carry out their duties safely.
- Workstations and seating are provided and arranged to allow tasks to be carried out safely and comfortably.
- Suitable and effective arrangements are in place for the maintenance of the workplace and of equipment, devices and systems provided.
- Adequate arrangements are in place for controlling the movement of vehicles and pedestrians such that both can circulate in a safe manner where premises are under the control of Convion Europe Ltd.

The person responsible for ensuring suitable welfare facilities are provided and maintained is:

Matthew Gilroy

WORK EQUIPMENT

Conviron Europe Ltd will take all reasonable and practicable steps to comply with the **Provision and Use of Work Equipment' Regulations 1988** and relevant health and safety legislation ensuring all equipment, machinery and plant used for work is suitable for the task and fit for purpose.

When choosing work equipment a number of factors must be considered:

- The task that the equipment or machinery is to be used for.
- The environment where it is going to be used and who is going to use it?
- All equipment purchased or hired by Conviron Europe Ltd must comply with the minimum safety standards as are required by **The Supply of Machinery (Safety) Regulations 2008**.
- We will also ensure our equipment is in compliance with British and ISO standards and it is CE marked when purchased within the European Union.

The person responsible for the supply and repair of work equipment and machinery is:

Matthew Gilroy

Conviron Europe Ltd will ensure the following conditions are adhered too:

Conviron Europe Ltd will undertake risk assessments and take all necessary measures to prevent, or where this is not practicable, adequately control exposure to specified hazards associated with the use of work equipment.

All work equipment will be suitable for the purpose for intended use, installed correctly, inspected and maintained in good working order, and where necessary statutory inspections carried out.

Where the use of work equipment is likely to involve a specific risk to health and safety Conviron Europe Ltd will ensure that the equipment is only used, repaired, modified maintained and serviced by authorised competent persons. Any defective work equipment will be taken out of action.

We will ensure all operators and employees are competent to use work equipment and appropriate health and safety information, instruction and training will be provided by Conviron Europe Ltd.

Access to dangerous parts of machinery will be effectively prevented by the provision of suitable guards or protective devices that are of good construction, sound material, and adequate strength and which are effectively maintained. Machinery guard checks will be undertaken prior to use.

We will ensure that all machinery is provided with suitable controls and control systems for starting, stopping and changing operating conditions, including those for use in an emergency situation.

Where appropriate all machinery will be provided with suitable means to isolate it from its sources of energy. All work equipment will be stable, adequately lit, clearly marked for reasons of health and safety and incorporate appropriate warnings or warning devices. Maintenance of work equipment will only be carried out where suitable measures have been taken to effectively control the risks.

Any problems found with plant/equipment must be reported to the manager/supervisor and must not be operated until it has either been fixed by a competent person or replaced.

Records of repair and maintenance are kept in:

Managers Office

WORKING AT HEIGHT

Conviron Europe Ltd will so far as is reasonably practicable, avoid the need to work at height by effective planning of works. Where this is not reasonably practicable it will carry out suitable and sufficient risk assessments of all such tasks and take appropriate steps to reduce the risk of injury. The **Working at Height Regulations 2005** requires us to consider a number of key elements prior to carrying out any work that involves a risk of a fall which is liable to cause injury to the employee.

Conviron Europe Ltd will ensure that:

- The need to work at height will be eliminated so far as reasonably practicable. Where working at height cannot be eliminated a risk assessment will be conducted to identify suitable control measures to prevent any person from falling a distance likely to cause personal injury. The risk assessment takes account of the distance and consequences of a fall, the duration and frequency of the task.
- The risk assessment and planning arrangements take into account the effects that the weather can have on outdoor work at height as well as emergency rescue plans where appropriate and identified in the risk assessment.
- If the weather conditions are adverse and likely to threaten the safety of our employees, then the task will be postponed until such time when it is safe to proceed.
- The most suitable methods of work, including control measures and work equipment will be selected prior to working at height.
- All equipment provided for working at height is properly maintained. Equipment for work at height is regularly inspected to ensure that it is safe to use. The equipment is marked to ensure that it is obvious when the next inspection is due. Pre-use checks are made before work equipment for work at height is used
- If ladders or step ladders are specified as a control measure the risk assessment justifies use (i.e. that the risk is low, the task is of short duration (15-30 minutes) or site conditions dictate).
- All employees will be trained and/or given written information and instructions prior to working at height. The level of training will be appropriate to the work undertaken and the degree of risk involved.
- The risks posed by fragile surfaces (i.e. surfaces where there is a risk of a person or object falling through, these surfaces may be either close to or part of the structure on which work is to be done and will include vertical or inclined surfaces) are managed.
- Work requiring regular access where there is a fragile surface, permanent fencing, guards or other permanent measures to prevent falls is put in place. Steps are taken to ensure that falling material or work equipment is prevented. Loads and equipment are stored correctly so they do not collapse or fall at any time and cause injury.
- The provision of supervision is proportionate to the findings of the risk assessment and the experience and capability of the people involved in the work.

Conviron Europe Ltd will carry out a risk assessment, taking into account the factors indicated above. If the work is beyond what we consider acceptable then we will call on the services of a specialist contractor to either undertake the work, or make the work zone easily accessible to our employees.

The person responsible for carrying out the working at height risk assessments is:

Matthew Gilroy

WORK RELATED STRESS

Conviron Europe Ltd recognises that its employees are its most valuable asset and that pressures at work could cause high and long-lasting levels of stress. Conviron Europe Ltd recognises that work related stress can cause ill health and will put controls in place to help prevent stress in the workplace. However, Conviron Europe Ltd cannot be held responsible for stress caused by outside sources such as financial or domestic problems, although Conviron Europe Ltd will be sensitive to this issue and offer support to affected employees.

Tackling work-related stress at source requires a partnership approach with all employees and their representatives based on openness, honesty and trust. Conviron Europe Ltd recognises that non-work related problems can make it difficult for people to cope with the pressures of work. Because stress does not affect all people in the same way and that one person may find a job stressful when another does not, it is not possible to assess the risk to all employees.

Employees are encouraged to discuss any matters that may affect their work with their manager/supervisor or senior staff with whom they feel comfortable. If Conviron Europe Ltd is made aware that someone is particularly stressed/vulnerable because of their work circumstances it may be able to find ways to relieve the pressures at work so that they do not become excessive and have a detrimental effect on their work.

The risks from stress are effectively controlled so far as reasonably practicable by the identification and assessment of potential work-related stressors. Conviron Europe Ltd encourages effective communication between management and employees particularly where there are organisational and/or procedural changes that may affect their work.

Employees should be adequately trained, competent and understand their roles and responsibilities and have sufficient information for the tasks they are required to perform. Positive behaviours to avoid conflict and ensure fairness are promoted throughout the organisation.

Employees should consult with their manager/supervisor on work patterns, the work environment and on all proposed action relating to the prevention of work related stress. Employees should be given adequate and achievable demands in relation to agreed hours of work.

Employees affected by stress are treated with understanding and confidentiality and are told what will happen with any information collected. Individuals who have been absent with stress are supported and consulted on a planned return to work. The source(s) of stress are addressed as far as is reasonably practicable and the effectiveness of measures to reduce stress is monitored.

Stressful situations can be reported in confidence to:

HR & Matthew Gilroy

Stress counselling will be provided if and when necessary by:

By The Employees General Practitioner

WORKPLACE TRAFFIC MANAGEMENT

The Workplace (Health, Safety and Welfare) Regulations 1992 and the **Management of Health and Safety at Work Regulations 1999** places specific duties on Convicon Europe Ltd to manage risks and secure a safe workplace so far as is reasonable practicable.

Regulation 17 requires that “every workplace shall be organised in such a way that pedestrians and vehicles can circulate in a safe manner” and that “all traffic routes are suitably indicated where necessary for reasons of health or safety”.

Workplace transport refers to any vehicle that is used for the purposes of work by employers, employees or visitors in any workplace. It covers a wide range of vehicles such as forklift trucks, cars, vans, buses, small electric vehicles and Lorries.

Road systems will be clearly and logically arranged, allowing adequate space for movement, reversing, turning, loading and off-loading. Convicon Europe Ltd will ensure a risk assessment will be completed in respect of workplace traffic management to ensure that the site, vehicles, drivers and pedestrians are safe.

The following procedure should be adopted whenever operating vehicles:-

- All drivers of vehicles or operators of plant will be suitably qualified and authorised to use such vehicles or plant (i.e. hold a current and valid license/certificate for the vehicle/plant) All drivers/operators will ensure they are fit to drive the vehicle/item of plant (i.e. not suffering from a health condition or under the influence of alcohol or drugs);
- All drivers/operators will maintain attention at all times and follow the highway code when on the public highway and company rules whilst on company property;
- Vehicle cabs must be kept clear of rubbish which may interfere with the operation of foot pedals;
- Any vehicle reversing warning light and/or sounder must be kept in good working order;
- Daily checks will be carried out prior to the use of the vehicle;
- Drivers will not use a mobile telephone or hand held radio whilst driving. Drivers will ensure that they pull over and park up in a suitable location and switch off the engine before using a hand-held mobile telephone.
- Drivers will take regular breaks and will ensure that they comply with all relevant legislation.
- A "Safe stop" procedure must be used when leaving any vehicle where appropriate. This means that handbrake applied, gears in neutral, all power isolated, ignition key removed.
- Forks on FLT's must be lowered to ground level to prevent presenting a trip hazard;

If an employee requires any medication, whether prescribed or bought over-the-counter, then they should consider that this may temporarily affect a worker's fitness to operate workplace transport. Therefore workplace transport operators should:

- Convicon Europe Ltd will instruct their employees to ask their general practitioner or pharmacist about the effects any medication they are taking which may have on their ability to drive safely.
- Convicon Europe Ltd will ensure that employees will inform their employer if there is a risk of adverse effects which may compromise safety when taking any form of medication.

The person responsible for workplace traffic management is:

Matthew Gilroy

VISITORS AND CONTRACTORS

Convion Europe Ltd recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes controlling the safety and work of visitors and contractors so far as reasonably practicable when present on company premises.

Visitors and Contractors refer to invited persons who attend site in an official capacity and does not apply to casual visitors. All reasonable steps will be put in place to protect the safety of casual visitors when visiting our company premises and all safety information will be given to them using safety signage displayed on site.

Visitors and contractors will not be permitted on company premises unless specifically authorised and, where necessary, accompanied at all times by a company employee. All visitors and contractors will be required to comply with Convion Europe Ltd Health and Safety Policy and relevant rules and procedures.

Convion Europe Ltd will provide all visitors and contractors with such information, instruction and training as required to ensure their health and safety and to assist them in complying with their legal obligations under relevant Health and Safety legislation.

All visitors and contractors must report to Convion Europe Ltd reception area upon arrival and leaving. Convion Europe Ltd will take account of the possible presence of visitors and contractors when developing, implementing and practising fire and other emergency procedures.

All visitors and contractors must report immediately any accidents or incidents resulting in injury or damage to Convion Europe Ltd. Convion Europe Ltd will record all accidents and incidents involving visitors and contractors and comply with their legal reporting requirements under RIDDOR.

All contractors will be expected to comply with all relevant legal requirements, codes of practice and guidance relating to their operations and work activities. All contractors will be subjected to a health and safety assessment of their competence and suitability before being allowed to work on site.

This policy section should not be read in isolation as further information and guidance can be obtained from the policy section 'The Control and Selection of Contractors'.

The persons responsible for implementing and monitoring Visitors and Contractors rules and procedures is:

Matthew Gilroy

VIOLENCE, AGGRESSION AND CHALLENGING BEHAVIOUR AT WORK

Conviron Europe Ltd will so far as reasonably practicable examine all workplaces and activities under its control to assess the risks to the health and safety of employees, temporary workers, vulnerable persons or others concerning the risks from violence, aggression and challenging behaviour.

Conviron Europe Ltd will identify situations which may expose our employees to violence or challenging behaviour and also identify those employees who may be at greater risk of such circumstances occurring or developing.

Conviron Europe Ltd will ensure arrangements are in place to protect our employees from violence or challenging behaviour whilst conducting their various tasks on behalf of Conviron Europe Ltd. Procedures will be implemented to ensure the safety of employees who are required to work alone or unsupervised for significant periods of time.

Training, information and instruction will be given to all employees to ensure they fully understand the arrangements and procedures in place to protect them. Action will be taken immediately should a report and/or threat of violence or challenging behaviour (including verbal abuse) be reported. These arrangements and procedures will be maintained to ensure adequacy and suitability and will be amended or developed as necessary to ensure the wellbeing of our employees.

All persons who may be at an increased risk from violence or challenging behaviour are identified and receive appropriate training to deal with such situations. Training in the prevention and management of violence, aggression and challenging behaviour will be provided where it is considered necessary and employees are encouraged to report any threats, incidence of violence, aggression or challenging behaviours.

A formal system for reporting threats and/or incidents concerning violence, aggression or challenging behaviours is initiated and maintained, normally through the manager/supervisor. All employees will be instructed on the procedure for reporting violent or potentially violent incidents and action on reports of violence at work is taken immediately.

Where appropriate, support and/or counselling is offered to any employee who is subjected to violence at work which can be obtained from the employee's General Practitioner and external Occupational Health providers.

Violence and aggression in the workplace is unacceptable but is a recognised hazard, therefore to reduce the risk to any of our employees a specific risk assessment will be carried out and reviewed as and when required but at least annually.

The person responsible for undertaking violence, aggression and challenging behaviour risk assessments is:

Matthew Gilroy

VULNERABLE PERSONS

Conviron Europe Ltd will examine all workplaces and activities under our control to assess the risks to the health and safety of employees, temporary workers, vulnerable persons or others who may be adversely affected by our activities. Conviron Europe Ltd will ensure that the significant findings of the assessments are recorded and the control measures identified are fully implemented.

Conviron Europe Ltd will ensure that:

- Where employees have been identified as 'vulnerable', then specific vulnerable person's risk assessments will be undertaken and control measures fully implemented.
- Vulnerable person's risk assessments will be conducted in consultation with the relevant employee.
- All vulnerable persons are given comprehensive and relevant information on the results of the risk assessments and the requirements of the relevant regulations.
- All employees comply with their duties under the regulations and that specific arrangements are in place to ensure the health and safety of vulnerable persons.
- All vulnerable persons are competent to undertake their duties and are provided with appropriate information, instruction and training.
- Personal protective equipment, health surveillance etc. is provided for vulnerable persons, where required and that procedures are in place for serious and imminent danger.
- Consideration is given to any workers with specific needs such as a language, visual impairment, hearing deficiencies or learning difficulties.
- Where necessary 'Personal Emergency Evacuation Plans' will be undertaken.

Co-operation and co-ordination between the employee and their manager/supervisor is essential to ensure that respective obligations are met and health and safety arrangements are agreed prior to the work or activity commencing.

The manager/supervisor will conduct a risk assessment with the employee. Where appropriate, the risk assessment will identify any reasonable adjustments necessary to our arrangements or physical features of the workplace, to remove any disadvantage to people with special needs or disabilities or who may be considered vulnerable. Many people may need only minor adjustments.

With respect to temporary workers, Conviron Europe Ltd will provide them with induction and specific training on the risks to which they are exposed and the necessary control measures, including arrangements for emergency evacuation. Where personal protective equipment (PPE) is necessary and not commonly available within the workplace, the employment agency will ensure it is provided.

This policy should not be read in isolation and where necessary manager/supervisors should also familiarise themselves with the Fire Safety, Young Persons, Pregnant and Nursing Mothers and Lone Working sections of the health and safety policy.

The person responsible for ensuring vulnerable person's risk assessments are carried out is:

Matthew Gilroy

The vulnerable person's risk assessments will be reviewed annually or if any significant change takes place concerning the vulnerable person or their work activities.

YOUNG PERSONS

The Management of Health and Safety at Work Regulations 1999 defines a young person as someone who is over the legal school leaving age of 16 years but has not reached the age of 18 years. Further consideration should be given to young people who are placed within the working environment on 'Work Experience'. Conviron Europe Ltd will do all that is reasonably practicable to ensure students or children on placements are not placed in a working environment where there are significant risks to their health and safety.

Conviron Europe Ltd will not employ any 'young person' (below the age of eighteen) without first making, individual 'Young Persons' risk assessments and taking into account:

- Their inexperience, and lack of awareness of risks
- The fitting-out and layout of the workplace and their workstation
- The nature, degree and duration of exposure to physical, biological and chemical agents
- The form, range and use of work equipment and how it is handled
- The organisation of processes and activities
- The extent of Health and Safety training provided or to be provided
- Specific risks defined in relevant legislation.

Due to of their lack of experience, maturity and lack of awareness it is essential that they are supervised at all times until they gain the required experience, maturity and awareness of the risks.

The person responsible for ensuring that the risk assessment of the young person is carried out is:

Matthew Gilroy

Any young person will be provided with all the information; instruction, training and supervision they require. They will also be provided with a mentor (responsible employee), who has accepted the responsibility of overseeing the young person.

Young people will not be allowed:

- To carry out work that is beyond their mental and physical capability.
- To be exposed to substances that is toxic or carcinogenic.
- To carry out tasks that can involve risks be assumed is beyond their recognition.
- To be exposed to extremes of heat, cold, noise and vibration.

Young people must:

- Carry out all reasonable instructions given to them by their supervisor/mentor.
- Report anything or any task that they feel unsure or unsafe about
- Refrain from horseplay or practical jokes.

PRESSURE SYSTEMS

Under **The Pressure Systems Safety Regulations 2000** Conviron Europe Ltd has a duty to ensure that any Pressure Systems as defined in the regulations under the control of Conviron Europe Ltd within the premises are installed, used and maintained by a competent person.

Conviron Europe Ltd recognises that Pressure Systems have the potential to cause significant injury or damage to property in the event of system or component failure resulting in unexpected release of stored energy. It further recognises that it is extremely important that the system is correctly installed and used, maintained, and subject to thorough examination and test as prescribed under the Written Scheme of Examination.

Conviron Europe Ltd will ensure:

- That pressure systems are identified at the general risk assessment stage and those in charge of areas made aware of their location.
- That pressure systems are installed by a competent person and in positions that would minimise injury and damage in the event of unexpected releases of stored energy, and that the safe operating limits of pressure systems are established prior to first use and are clearly marked on the system.
- Operators of pressure systems will be given adequate and suitable instruction on the safe operation of pressure systems and any emergency procedures.
- That a competent person prepares a written scheme of examination for systems above 0.5 bar, including pipe work, where steam or fluid is stored. This will also be done for a compressed air receiver, and the associated pipework, where the product of the pressure in bars multiplied by the internal capacity in litres of the receiver is equal to or greater than 250 bar litres, and other applicable systems.
- A competent person will carry out all maintenance, thorough examinations and tests as prescribed in the written scheme of examination.
- Any necessary repairs arising from any reports on the condition of the systems or from any fault reporting system are completed without delay.

Typical frequency for inspections are as follows:

- Steam Boilers and Ovens 14 Months
- Steam Pressure Plant 26 Months
- Hot Water Boilers (>100°C) 14 Months
- Air Pressure Plant 26/48 Months (dependant on maintenance and conditions)
- Air condition and refrigerating plant (>25kW) 48 Months
- Other Pressure Systems 26-144 Months

The competent person responsible for arranging inspection of pressure equipment is:

Matthew Gilroy

Records of these inspections are kept in:

Managers Office

LIFTING OPERATIONS AND LIFTING EQUIPMENT

Convion Europe Ltd will take all reasonable and practicable steps to comply with all relevant legislation and best practice regarding control of **Lifting Operations and Lifting Equipment Regulations 1998 (as amended)** and will provide adequate training and advice to relevant persons.

Convion Europe Ltd will ensure:

- All hired Lifting Equipment has been subjected to regular inspections and 'Thorough Examinations' throughout the life of the equipment in line with the requirements of the Lifting Operation and Lifting Equipment Regulations, normally at six or twelve-monthly intervals.
- Any failure of lifting equipment must be reported to your Enforcing Authority under the requirements of RIDDOR and the hire company (see Policy for reporting procedure).
- Hired ride on forklift trucks will be checked to confirm twelve monthly 'Thorough Examinations' and six monthly 'Thorough Examinations' should the fork lift truck be used in conjunction with a work platform /man cage and used for lifting people.
- Any hired lifting equipment (MEWPS, Scissor Lifts, Genie Lifts, etc.) used to lift or support persons will be checked to confirm six-monthly examinations.

The competent person responsible for arranging inspection of lifting equipment is:

Hire Company

The safety of all persons who may be affected by any of our lifting operations by ensuring that all persons engaged in our lifting operations are trained and competent to undertake such work.

That appropriate lifting plans and risk assessments are conducted by competent persons in relation to lifting operations carried out within our undertaking and introduce adequate measures to control the risks identified to as low a level as is reasonably practicable

The competent person responsible for arranging lifting operations is:

Matthew Gilroy

LEGIONELLA

The Control of Substances Hazardous to Health Regulations 2002 (COSHH), relate to the risks from hazardous substances and biological agents including legionella bacteria. Under Health and Safety legislation, duty holders, including employers and anyone who is responsible for the workplace have a duty to ensure that the premises, plant and machinery do not endanger the people using them including the risk from exposure to Legionella bacteria.

Conviron Europe Ltd is committed to providing a safe and healthy working environment and will take all reasonable and practicable steps to comply with all relevant legislation, Approved Codes of Practice and best practice regarding the control of Legionella.

Control of legionella bacteria is normally achieved by suitable design and maintenance of the hot and cold water system and its associated plant. Additional control is achieved by appropriate storage of water and delivery of water at temperatures which do not allow the bacteria to proliferate, i.e. water temperatures kept in the range of between 20–45 °C.

Other control measures include regular flushing of pipes and taps used infrequently, cleaning and disinfection of water system and storage tanks, microbiological sampling at a frequency prescribed in the risk assessment, engineering measures, such as ensuring temperature control valves are working properly and the not allowing the water systems to build up of deposits which encourage the growth of legionella bacteria.

Conviron Europe Ltd will aim to control the risk from Legionella by:

- Carrying out a suitable and sufficient risk assessment which identifies and assesses sources of risk from legionella bacteria and implementing suitable control measures where necessary. The risk assessment should include and record the following:-
 - Management responsibilities, including the name of the competent person and a description of our hot and cold water system and associated plant.
 - Competence and training of key personnel
 - Any identified potential risk sources
 - People who are at risk including any known vulnerable persons
 - Any means of preventing the risk or controls in place to reduce the risks
 - Monitoring, inspection and maintenance procedures
 - Records of the monitoring results and inspection and checks carried out
 - Arrangements to review the risk assessment regularly, particularly when there is reason to suspect it is no longer valid and not less than two yearly intervals.
- If the risk assessment concludes that there is a reasonably foreseeable risk of legionella, then we will arrange for a full legionella/ water safety risk assessment including a written scheme to be undertaken by a competent person.
- Implement, manage and monitor the control measures and precautions identified in the risk assessment and written scheme of work and keep records of any action taken.
- Where necessary arrange for the 'Competent Person' to receive appropriate instruction, information and/or training in any procedures and measures that are introduced to control the risk from Legionella and maintain training records.
- Review legionella risk assessments at no more than two-year intervals.

The person responsible for ensuring Legionella risk assessments are undertaken is:

Matthew Gilroy

ASBESTOS (WORKING WITH ASBESTOS AND DUTY TO MANAGE)

The Control of Asbestos Regulations 2012 requires Conviron Europe Ltd to protect the health and safety of its employees and others who may be affected by its activities, including hazards arising from exposure to Asbestos Containing Materials (ACM's) so far as is reasonably practicable.

Under the **Control of Asbestos Regulations 2012** and relevant health and safety legislation **Conviron Europe Ltd** will ensure risk assessments are undertaken and suitable steps are taken to ascertain whether the premises contain any ACM's prior to the commencement of any work undertaken.

With regard to employees and other people who are likely to come into contact or disturb any asbestos containing materials, we will ascertain if our client premises have any Asbestos Containing Materials (ACM's) within or on them and minimise any potential exposure through effective management procedures including undertaking risk assessments.

The risk assessment will include details of the asbestos survey/register and or plan including the location and condition of asbestos, including presumed ACM's, and assess the risk of the likelihood of anyone including our own employees being exposed to asbestos fibres during the course of their work activities.

For non-licensed work and notifiable non-licensed work the risk assessment shall include a statement of the reasons why the work with asbestos will not require a licence. A detailed plan of works will be made to supplement the risk assessment. The plan of work will detail what the work will involve, location, duration, type of ACM's, procedures to reduce exposure, equipment and PPE required, decontamination procedures, waste disposal and emergency procedures.

Conviron Europe Ltd will ensure any employees who work with ACM's will be suitably trained and instructed on the task involved and plan of work including any relevant guidance from the HSE .

For any notifiable non-licensed work the relevant enforcing authority will be notified as necessary and records will be kept for four years and we will arrange for relevant employees to receive a medical examination prior to starting work.

For any licensed work, which includes working with asbestos insulation, asbestos coating or asbestos insulating board we acknowledge the need to hold a current and relevant licence issued by the Asbestos Licensing Unit.

The person responsible for ensuring that an asbestos risk assessment has been undertaken prior to working offsite site is:

Matthew Gilroy

NOISE EXPOSURE

The **Control of Noise at Work Regulations 2005** requires Conviron Europe Ltd to monitor noise levels within the workplace. This is to ensure that all our employees and any contractors or visitors are not exposed to noise levels likely to cause short or long-term hearing damage.

The current noise exposure levels are set as follows:

The **Lower Exposure Action Values** are:

- A daily or weekly exposure level of **80dB(A)**
- A peak sound pressure level of **135dB(C)**

The **Upper Exposure Action Values** are:

- A daily or weekly exposure level of **85dB(A)**
- A peak sound pressure level of **137dB(C)**

The **Exposure Limit Values** are:

- A daily or weekly exposure level of **87dB(A)**
- A peak sound pressure level of **140dB(C)**

The **Exposure Limit Value** will take into account the effectiveness of any hearing protection that is provided and worn.

So as to ensure that our noise levels are maintained to the lowest levels possible we will ensure that a suitable and sufficient risk assessment is carried out. It is the policy Conviron Europe Ltd to use equipment with low noise emission levels or to provide covers, enclosures or sound damping equipment to reduce the amount of noise in our business premises and activities.

Personal protective equipment such as earplugs and ear defenders will be provided as a last resort. This personal protective equipment will be suitably assessed and meet the relevant British and European standards.

The actions implemented will follow the hierarchy below:

- At the **Lower Exposure Action Level** hearing protection will be provided and employees and visitors will be advised to wear the hearing protection.
- At or above the **Upper Exposure Action Level** hearing protection will be provided for all employees and visitors. In areas where the noise levels are above 85 dB (A) it will be mandatory for employees and visitors to wear the hearing protection. Employees found to be in breach this rule will be subject to disciplinary action. A visitors refusing to wear the hearing protection will not be allowed in the area. Signs will be placed to warn staff and visitors that they are entering a hearing protection zone.

Health Surveillance programmes will be put in place where necessary. Employees that are regularly exposed to noise levels above the Upper Exposure Action Level will be expected to attend audiometric testing.

The person responsible for carrying out and reviewing the noise risk assessments is:

Matthew Gilroy

VIBRATION EXPOSURE

The **Control of Vibration at Work Regulations 2005** requires Conviron Europe Ltd to take measures to protect employees from the effects of exposure to vibration in the workplace. The vibration can be as a result of the use of work equipment in use or the process itself. There are two particular subject areas that require consideration; these are vibration exposure to the hand and arms or vibration exposure to the whole body.

To ensure that Conviron Europe Ltd complies with these regulations we will ensure that:

- We consider vibration exposure when we are carrying out specific risk assessments for the use of particular pieces of work equipment. This is particularly important when our employees are using hand held tools or are carrying out plant driving activities.
- When we consider that the levels of vibration exposure are fairly high and there is a possibility that the levels of vibration are likely to cause long-term health problems. Then we will call on the services of a competent body to carry out a survey. The results of the survey will enable us to determine whether we are within the Exposure Action Value of $2.5 \text{ m/s}^2 \text{ A(8)}$. We must also consider whether the Exposure Action Limit is being exceeded this is currently set at $5 \text{ m/s}^2 \text{ A(8)}$. If the results show that the limit is being exceeded then we must take immediate action to reduce the level exposure.
- In order to control the level of risk from vibration we will consider as far as reasonably practicable the following:
 - The equipment we purchase in order to ensure that vibration exposure is suppressed to low levels.
 - We will ensure that all our equipment is well maintained and/or replaced as and when required.
 - We will reduce the length of time that employees are likely to use the equipment by eliminating the need to use the equipment or by job rotation.
 - We will provide our employees with sufficient information and instruction to raise their awareness of the exposure health risks. Typical information provided will be the recognition of the effects of hand arm vibration and vibration white finger.
 - We will provide personal protective equipment and emphasise the importance of maintaining heat in the body's extremities.
- Employees must inform management of any symptoms that they feel they are suffering as a result of vibration exposure. The symptoms may be:
 - Tingling of the hands and fingers.
 - Joint pains and numbness.
 - Back pain after driving activities.
 - Whitening of the fingers especially during cold weather.
- Employees identified as being regularly exposed to vibration may be requested to enter into a health surveillance programme. This programme will enable us to monitor our employees and ensure that our control measures are working effectively.

The person responsible for ensuring a vibration risk assessment is carried out is:

Matthew Gilroy

HEALTH SURVEILLANCE

Conviron Europe Ltd primary concern is to achieve and maintain the overall well-being, quality of life and work performance of our employees to minimise the impact of work on their physical and mental health.

We will therefore ensure that the causes of ill-health which may arise from our work activities are, wherever possible identified, understood and either prevented or controlled. Where required our occupational health provision will be delivered through a number of measures ranging from regular health assessments and surveillance, medical referrals and support.

Where possible we will endeavour to provide suitable and sufficient information to help employees take personal responsibility for maintaining and improving their own health. Where required we will make reasonable adjustments for people with disabilities to support them in their employment with Conviron Europe Ltd.

We recognise that some hazardous substance exposure requires us to provide health surveillance of employees. The level of health surveillance is dependent upon the level of exposure and the hazardous substance involved. This will be determined at the CoSHH assessment stage and form part of the control measure required.

Medical examinations may take the form of regular routine questionnaires, lung function tests, skin examinations and other relevant examinations. It is important to note that potentially hazardous substances range enormously from chemicals to hardwood dusts. That is why it is necessary to perform an adequate risk assessment of all jobs and processes to determine the need for health surveillance.

Fitness for work health assessments must be offered to night workers under the Working Time Regulations.

The health surveillance arrangements usually require the services of an occupational health practitioner (e.g. Nurse or Doctor). When this situation arises we will provide these services at no cost to the employee.

Employees are reminded of their duty to report any concerns regarding their health and safety any concerns regarding health in connection with work must be directed to:

Matthew Gilroy or David Dixon

THE CONSTRUCTION (DESIGN & MANAGEMENT) REGULATIONS 2015

Convion Europe Ltd will ensure that when undertaking any construction work the requirements of the **Construction (Design and Management) Regulations 2015** are met. We will satisfy ourselves that any contractors or designers we engage are competent and adequately resourced.

We will ensure co-operation and co-ordination between all members of the project team. We will plan, manage and monitor construction work to ensure work is carried out safely. We will provide information to the relevant parties about risks to others created by our work.

We will provide information and training to our employees. Where we are the principal contractor we will develop the construction phase health and safety plan and liaise closely with any contractors. Where we are not the principal contractor we will co-operate and provide relevant information about our activities to the principal contractor and with any relevant rules in the health and safety plan. We will inform the principal contractor of any accidents and dangerous occurrences and provide information for the health and safety file.

The purpose of this section is to clarify the rolls of the key duty holders. Convion Europe Ltd will most commonly take the roll of a “contractor” but it is important that we understand the rolls of other duty holders.

Client

The 'Client' is anyone having construction or building work carried out as part of their business. This could be an individual, partnership or company and includes property developers or management companies for domestic properties. For all projects involving more than one contractor (trade contractor) the Client must appoint both the Principal Designer and Principal Contractor in writing, otherwise they are deemed to be carrying out these rolls. The Client is to ensure a Construction Phase Plan provided by the contractor or Principle Contractor is in place before any works commence.

Principle Designer

A 'Principle Designer' (replacing the roll of the previous CDM Co-ordinator) has to be appointed to notify the HSE, before works commence, should the project exceed 30 construction days with 20 or more workers working simultaneously, or if the projects exceeds 500 person days. The Principle Designers roll is to advise the client on health and safety issues during the design and planning phases of construction work. In particular to:

- Advise and assist the client with his/her duties
- Notify HSE
- Co-ordinate health and safety aspects of design work and cooperate with others involved with the project
- Facilitate good communication between client, designers and contractors
- Liaise with Principal Contractor regarding ongoing design
- Identify, collect and pass on pre-construction information
- Prepare/update Health and Safety File

Designer

'Designers are those who, as part of their work, prepare design drawings, specifications, bills of quantities and the specification of articles and substances. This could include architects, engineers and quantity surveyors. They should;

- Eliminate hazards and reduce risks during design
- Provide information about remaining risks
- Check client is aware of duties and Principle Designer has been appointed
- Provide any information needed for the Health and Safety File

Principal Contractor

A 'Principal Contractor' has to be appointed for projects that last more than 30 days or involve 500 person days of construction work. The principal contractor's roll is to plan, manage and co-ordinate health and safety while construction work is being undertaken.

The principal contractor is usually the main or managing contractor for the work.

- Plan, manage and monitor construction phase in liaison with contractors
- Prepare, develop and implement a written plan and site rules (Initial plan completed before the construction phase begins)
- Give contractors relevant parts of the plan
- Make sure suitable welfare facilities are provided from the start and maintained throughout the construction phase
- Check competence of all appointees; ensure all workers have site inductions and any further information and training needed for the work.
- Consult with the workers, liaise with Principle Designer regarding ongoing design
- Secure the site

Contractor

A 'Contractor' in the terms of this policy is a business that is involved in construction, alteration, maintenance or demolition work.

- Plan, manage and monitor own work and that of workers
- Check competence of all their appointees and workers
- Train own employees and provide information to their workers
- Comply with the specific requirements in Part 4 of the Regulations
- Ensure there are adequate welfare facilities for their workers
- Co-operate with principal contractor in planning and managing work,
- Provide details to the principal contractor of any contractor whom he engages
- Provide any information needed for the health and safety file
- Inform principal contractor of problems with the plan
- Inform principal contractor of reportable accidents, diseases and dangerous occurrences

Health and Safety File

The health and safety file amounts to a normal maintenance manual enlarged to alert those who will be responsible for a structure after hand over to risks that must be managed when the structure and associated plant is maintained, repaired, renovated or demolished. It is a record of information to inform future decisions on the management of health and safety.

The person responsible for ensuring the health and safety file is up to date is:

Rina Giancola

CONFINED SPACES

The **Confined Space Regulations 1997** require Conviron Europe Ltd to assess the level of risk of a confined space where our employees may enter or carry out such work processes. We will, so far as is reasonably practicable, avoid the need for any employee to undertake work or enter a confined space. Where reasonably practicable to do so we will ensure work is carried out from outside of the space. Where work cannot be avoided or entry into a confined space is unavoidable, then any work or entry into a confined space will be risk assessed and a safe system of work implemented including emergency procedures and 'permit to work' system.

Any employees who are to work in or enter a confined space or be associated with any such tasks will be given adequate training, instruction and information to enable them to undertake the tasks in a safe manner. Equipment provided for use in confined space work or entry will be sourced and maintained as required to ensure it remains serviceable and in good working order.

Conviron Europe Ltd will carry out a suitable and sufficient assessment of the risks for work in confined spaces, this means identifying the hazards present, assessing the risks and determining what precautions to take. In most cases the assessment will include consideration of:

- The task
- The working environment
- Working materials and tools
- The suitability of those carrying out the task
- The arrangements for emergency rescue
- Adequate supervision is provided commensurate with the level of risk identified in the risk assessment.

The confined space can be any space of an enclosed nature where there is a risk of death or serious injury from hazardous substances or dangerous conditions (e.g. lack of oxygen, poisonous fume or vapour). Some confined spaces are fairly easy to identify, e.g. enclosures with limited openings:

It is not possible to provide a comprehensive list of confined spaces. Some places may become confined spaces when work is carried out, or during their construction, fabrication or subsequent modification.

If we cannot avoid an entry into a confined space we will have a safe system for working inside the space. A permit to work system will be implemented.

The person responsible for carrying out the confined spaces risk assessment is:

Matthew Gilroy

COVID-19 - POLICY AND CONTINGENCY PLAN

As the virus continues to spread, it could pose a significant threat to some organisations. We live in a global economy and many employers have operations or supply chains based overseas. The company's employees, customers and visitor's health and well-being, and measures to prevent the virus from spreading will be at the heart of the company's response.

If the virus becomes a pandemic it could lead to wider disruptions with suppliers and customers and to shortages of fuel and other basic commodities.

Information and preparation

Convicon Europe Ltd will keep up to date with Government and public health advice: This is a fast-moving issue. The company will attempt keep up to date with the situation as it develops and refer employees who are concerned about infection to official and expert medical sources such as [GOV.UK](https://www.gov.uk) and the [National Health Service](https://www.nhs.uk). There are basic but effective ways to help prevent the infection's spread including:

- Making sure our workplace is clean and hygienic.
- Promoting regular and thorough hand-washing by everyone
- Providing all employees with access alcohol-based hand rub.
- Make sure managers know how to spot symptoms of coronavirus and are clear on any relevant processes, for example sickness reporting and sick pay, and procedures in case someone in the workplace develops the virus.
- Encouraging people to use and bin tissues.
- We are undergoing regular deep-cleaning of all our offices.
- Colleagues returning from travel, either business or personal, from a high-risk area are being asked to work from home for 10 days irrespective of symptoms.

Contingency planning:

Our organisation will assess our own level of exposure to business disruption caused by the virus. We currently do not have business or have supply chains in China therefore, we expect a limited impact to the company's day-to-day operations.

The plan will take account of current and potential impacts and manage the specific business risks associated with the disruption, including service delivery and workforce issues. We will communicate the plan to key teams and individuals across the business

As the spread of the virus continues, employers are likely to face the following situations:

- **If employees have been told by a medical professional to self-isolate:**
The advice from the Government is that if NHS 111, or a doctor, advises an employee or worker to self-isolate, they are entitled to Statutory Sick Pay. This includes individuals who may be a carrier of COVID-19 who may not have symptoms. Employers should use discretion around the need for medical evidence for a period of absence where an employee is advised to self-isolate in the current exceptional circumstances. Employees can self-certify for the first seven days. CIPD also recommends that employers providing contractual sick pay should provide this if a member of staff is asked to self-isolate by a medical professional even if they have no symptoms. Alternative options to providing sick pay are to allow people who are asked to self-isolate to work from home wherever possible, and continue to pay as normal.
- **If an employer sends people home as a precaution:**
Employees are following the reasonable instruction of their employer and should get their normal pay.

- **If employees choose to self-isolate but have not been advised to by a medical professional, and have no symptoms:**
- Employees who voluntarily self-isolate without symptoms, and without their employer's agreement, could be required to attend work by their employer. However, employers should take people's concerns seriously, especially if there are underlying health conditions, including mental ill health.
- **If an employee's children are sent home because of school closure:** The company would have to expect there to be some disruption to a person's ability to work as normal, depending on the child's age. Employees may choose to take this time off as holiday so normal processes and pay apply. If an employee is unable to work from home, they could be granted unpaid [emergency time off](#) or unpaid [parental leave](#).