



# Health and Safety Policy

Prepared by



March 2023

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## Policy Amendment History

Version	Date	Amendment Details
1.0	8 February 2018	First issue
2.0	30 January 2019	Updates to DPA and Business Improvement Manager job title
3.0	12 February 2020	Update to organisation chart and inclusion of stress and mental health sections
4.0	22 February 2021	Annual review and update references to SafetyNet. Re-organise Part 3 to group arrangements into General, Health Risks, Safety Risks
5.0	9 March 2022	Annual review and update to arrangements for Driving at Work
6.0	17 March 2023	Annual review. Updates only to dates and version control

Version	Author	Date
1.0	Mark Shearer	8 February 2018
2.0	Mark Shearer	30 January 2019
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4.0	Karen Fanner	22 February 2021
5.0	Karen Fanner	9 March 2022
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Compiled and Updated by



## Part 1 – General Statement of Intent

Specialised Engineering Products Ltd recognises its obligations to ensure the health, safety and welfare of its employees and those affected by its actions. Specialised Engineering Products Ltd understands the benefits of creating a strong and healthy safety culture within this organisation and appreciates the need for all levels of the workforce to be involved in implementing the policy.

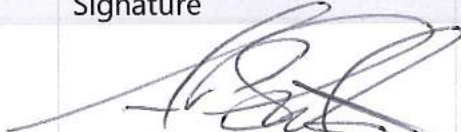
Specialised Engineering Products Ltd is fully committed to encouraging a culture of openness within our workforce regarding health and safety. We regard the promotion of health and safety matters as a mutual objective of both management and employees to ensure that practical, achievable safety standards are agreed and maintained by everyone within our organisation.

Good safety leadership begins with the commitment of senior management to ensure that the responsibilities and arrangements detailed within this document are carried out fully. The senior decision-makers within the organisation commit to providing the necessary resources to implement this policy. Andrew Smith is appointed as the Director responsible for health and safety. He takes responsibility for the effective implementation of this policy

The Company will, so far as is reasonably practicable:

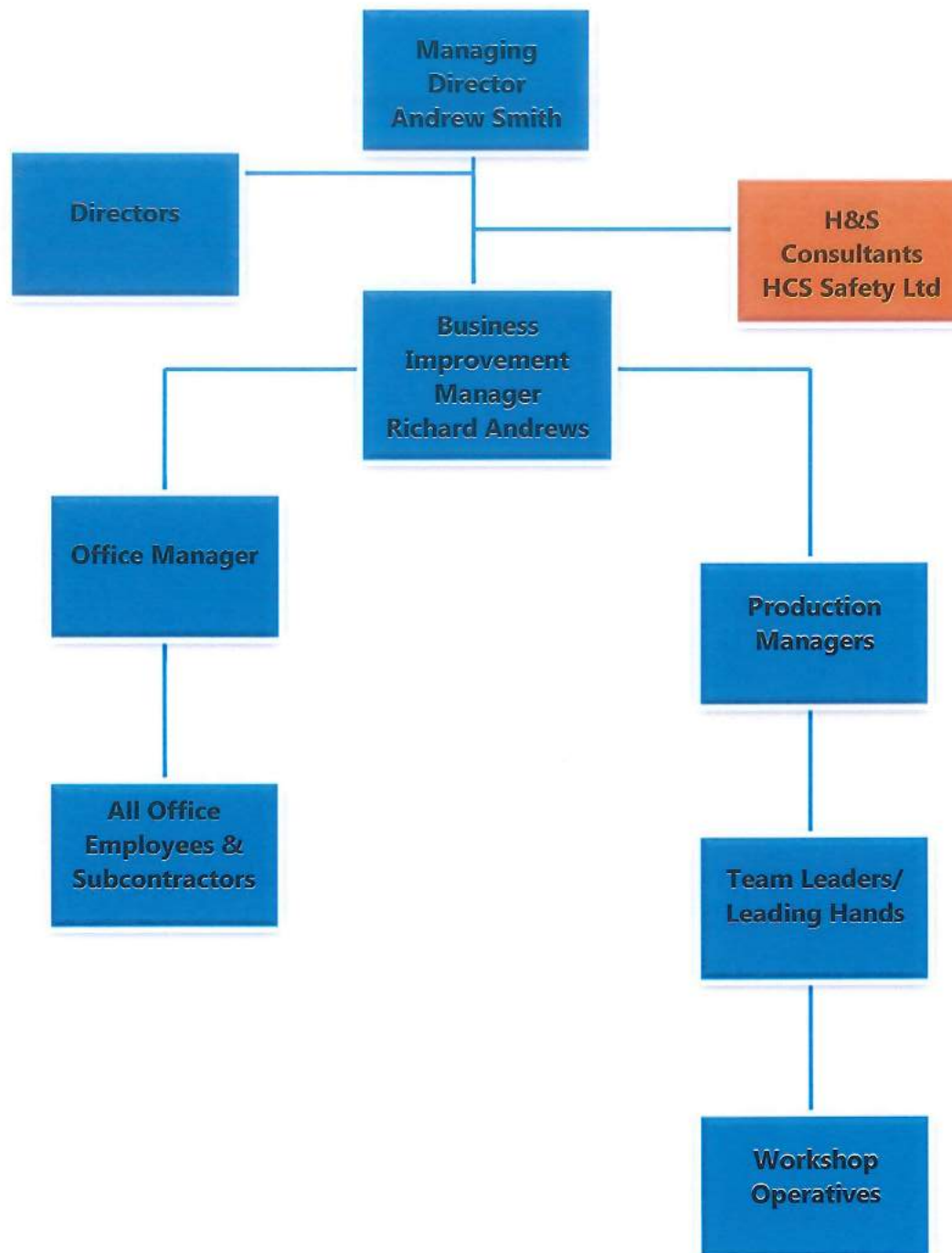
- provide and maintain plant, machinery, equipment, and systems of work that are safe and without risks to health.
- arrange safe and healthy systems for use, handling, storage and transport of hazardous articles and substances.
- provide sufficient information, instruction and training for all our employees, as is necessary, for them to conduct their work activities in a safe manner.
- provide and maintain means of access to and from the workplace that are safe and without risks to health.
- provide and maintain a safe and healthy working environment at all locations, in accordance with the relevant statutory requirements.
- provide and maintain adequate facilities and arrangements for the welfare of our employees whilst at work.

This policy is reviewed annually in liaison with our safety consultants and may be revised in the interim.

Name	Signature	Position	Date
Andrew Smith		Managing Director	21.3.2023

## Part 2 – Organisation and Responsibilities

### Organisation Chart





# Health and Safety Responsibilities

Everyone within Specialised Engineering Products Ltd has a significant contribution to make towards implementing this policy.

The following section describes the individual health and safety responsibilities for the roles present on the management structure chart. All persons within the organisation should be familiar with their health and safety responsibilities as failure to undertake them fully may be seen as misconduct or gross misconduct.

## Managing Director

The Managing Director has overall responsibility for ensuring that our health and safety policy is comprehensive, effective and kept up to date.

In particular, he will:

- appoint a manager to be responsible for health and safety.
- ensure that a health and safety policy is developed and brought to the attention of all employees.
- sign and date the general statement of intent and ensure that this policy is reviewed at least annually.
- ensure that adequate funding and resources are made available to meet the requirements of this policy.
- authorise health and safety expenditure.
- review safety inspection reports and monitoring data at management meetings.
- be aware that it is a criminal offence to intentionally or recklessly interfere with or misuse anything provided in the interests of health and safety or welfare.
- set a personal example of safe behaviour.

## Directors

Company Directors are accountable to the Managing Director for implementing the relevant requirements of the Company's health and safety policy within the departments and disciplines for which they are responsible.

In particular, they will:

- ensure compliance with this policy in all activities for which they are responsible.
- ensure that adequate resources are made available for the safe conduct of all work activities for which they are responsible.
- identify health and safety training needs in conjunction with the Health and Safety Consultants.

- ensure the provision of adequately trained and competent supervision and personnel to meet this policy's requirements.
- give support and encouragement to all managers for whom they are responsible.
- monitor the implementation of this policy in all activities for which they are responsible.
- be aware that it is a criminal offence to intentionally or recklessly interfere with or misuse anything provided in the interests of health and safety or welfare.
- set a personal example of safe behaviour.

## **Business Improvement Manager**

The Business Improvement Manager is responsible for health and safety and ensures the effectiveness of this policy.

In particular, he will:

- have full knowledge of all parts of this policy and how it relates to the health and safety management system.
- implement required training for staff at all levels.
- ensure that all employees have knowledge of this policy and that they are updated when any changes are made.
- seek the advice of the safety consultants whenever needed and heed the advice given.
- inform the consultants in good time of work that they are required to do.
- ensure that risk assessments for all work activities are carried out and where appropriate, ensure that standard operating procedures are prepared detailing how the work is to be done safely.
- ensure that any contractor appointed or self-employed person working on behalf of the Company, is competent to do the work.
- review contractors' risk assessments and method statements to ensure they are suitable and sufficient for the work activities for which they are written.
- consult with the workforce over any changes that may affect health or safety.
- ensure that plant and machinery used by Specialised Engineering Products Ltd is to a suitable standard.
- ensure that records are kept and retained as required by legislation.
- establish and maintain an adequate first aid and accident reporting system in compliance with current legislation.
- give support and encouragement to all managers for whom they are responsible.
- initiate disciplinary action against staff who do not comply with their duties under this policy or statutory requirements.



- be aware that it is a criminal offence to intentionally or recklessly interfere with or misuse anything provided in the interests of health and safety or welfare.
- set a personal example of safe behaviour and acknowledge suggestions for improvement.

## **Production Managers**

The Production Managers are accountable to the Directors and Business Improvement Manager for implementing the Company's health and safety policy and relevant health and safety legislation within the workshop over which they have control.

In particular, they will:

- be fully aware of the requirements of this policy.
- carry out risk assessments for all work activities within the workshop and provide detailed methods of work where necessary.
- ensure all work activities within the workshop are carried out in accordance with the method of work, for each work activity.
- ensure the workshop is maintained in a clean, neat and tidy state.
- ensure that stored materials are safely stored and stacked.
- ensure that chemicals are suitably stored in accordance with COSHH assessments.
- be fully aware of the COSHH information supplied and to ensure that workshop staff are made aware of it.
- ensure regular maintenance and checks on safety systems, including the local exhaust ventilation system.
- ensure that regular 12 monthly thorough examinations are carried out on the fork lift truck and any other lifting devices covered by the Lifting Operations and Lifting Equipment Regulations 1998.
- ensure that regular checks and maintenance are carried out on the forklift truck in accordance with the manufacturer's advice.
- ensure that regular cleaning and maintenance of workshop machinery is carried out in accordance with manufacturers' instructions.
- receive advice on any possible safety up-grades and to implement this advice so far as is practicable.
- ensure the competence of machine operators and to make appropriate judgements on the competence of apprentices and trainees before allowing them to use complex or dangerous machines.
- ensure that the correct personal protective equipment is worn by machine operators.
- ensure safe disposal of waste in accordance with the requirements of the product.
- be aware that it is a criminal offence to intentionally or recklessly interfere with or misuse anything provided in the interests of health and safety or welfare.

- set a personal example of safe behaviour.

## **Team Leaders and Leading Hands**

Team Leaders and Leading Hands are accountable to the Production Managers for implementing the relevant requirements of the Company's health and safety policy and specific methods of work.

In particular, they will:

- encourage operators to report any hazards observed and any defects in tools or equipment.
- address any hazards reported or observed and take out of service any defective tools or equipment.
- ensure that all tools and equipment used are safe, free from defect and have the required statutory certification, where appropriate.
- ensure that operators tidy away any debris, packaging materials, off cuts etc., that could cause a slipping or tripping hazard to themselves or others.
- ensure that personal protective equipment (PPE) is provided and used as required by the company rules and procedures.
- co-operate with the health and safety advisor in all health and safety matters.
- be aware that it is a criminal offence to intentionally or recklessly interfere with or misuse anything provided in the interests of health and safety or welfare.
- set a personal example of safe behaviour.

## **Office Manager**

The Office Manager is accountable to the Business Improvement Manager for implementing the health and safety policy and relevant health and safety legislation within the office over which they have control.

In particular, they will:

- be familiar with the health and safety policy and to cooperate in its implementation at all times.
- take reasonable care for the safety and health of themselves, fellow team members and any visitors to the office.
- comply with the requirements of the office fire risk assessment.
- be aware of the identity of the office First Aiders and to seek their assistance in the event of an accident.
- keep the office tidy, ensuring that personal belongings do not create trip hazards or present a fire risk.
- be aware of cable routes and to keep these tidy.
- wear appropriate protective clothing when it is necessary.



- report all hazards in the office to the Business Improvement Manager.
- attend safety meetings as required.
- ensure all accidents or near misses are reported whether persons are injured, or property is damaged or not to the Business Improvement Manager.
- be aware that it is a criminal offence to intentionally or recklessly interfere with or misuse anything provided in the interests of health and safety or welfare.

## **All Production Operatives and Employees**

All employees will:

- take reasonable care for the safety of themselves and others who may be affected by what they do or fail to do at work.
- co-operate with Specialised Engineering Products Ltd in matters of health and safety.
- be aware that it is a criminal offence to intentionally or recklessly interfere with or misuse anything provided in the interests of health and safety or welfare.
- read and comply with Specialised Engineering Products Ltd health and safety rules.
- behave in a responsible manner at all times; developing and demonstrating a personal concern for the health and safety of themselves and others.
- report damage to plant, tools or equipment to their immediate supervisor.
- use only plant, tools and equipment for which they have received training and authorisation.
- use and look after the protective equipment provided and report to their supervisor when it becomes worn or defective.
- ensure that any personal injuries are recorded in the accident book.
- inform their supervisor of any near miss incidents or hazardous situations.
- propose to their immediate supervisor ways of eliminating hazards and improving safety at their workplace.

## **Contractors on Company Premises and Sites**

All contractors working on Company premises or on any site where Specialised Engineering Products Ltd has been appointed Principal Contractor will at all times cooperate with Specialised Engineering Products Ltd rules and procedures.

In particular, they will:

- provide a copy of their health and safety policy and any risk assessments, procedures and method statements relating to the work to be undertaken.
- ensure that their activities are conducted safely, without risk to health and in accordance with all relevant health and safety legislation.

- ensure all work activities comply with the specific requirements of Specialised Engineering Products Ltd clients, where applicable.
- ensure that all accidents or injuries sustained as a result of their activities are recorded in the accident book and reported to Specialised Engineering Products Ltd management team.
- ensure that any near miss incidents are reported to the Company management team.
- provide trained and competent operatives, and ensure their attendance at any training course arranged by the Company.
- ensure that their employees are provided with the appropriate personal protective equipment and that it is used as directed.
- cooperate with the health and safety advisor during inspections and audits.

### **Visitors to Company Premises**

Specialised Engineering Products Ltd will ensure safe access and egress for all visitors to premises under the control of Specialised Engineering Products Ltd. In order to ensure safety and well-being, all visitors must:

- sign into the visitor's book and sign out again on departure.
- read and comply with Specialised Engineering Products Ltd safety rules and procedures.
- not enter any working areas unless accompanied by a Specialised Engineering Products Ltd representative or other nominated person.
- wear any personal protective equipment (PPE) as instructed.



## Part 3 – Health and Safety Arrangements

### General Arrangements

#### Health and Safety Assistance

Specialised Engineering Products Ltd has formally appointed HCS Safety Ltd as their competent advisors on matters of Health and Safety under Regulation 7 of the Management of Health and Safety at Work Regulations 1999.

HCS Safety Ltd provide a retained service which includes the following:

- Use of SafetyNet, a bespoke online system that allows access to:
  - Training records
  - The latest Annual Safety Review
  - Records of communication between Specialised Engineering Products Ltd and HCS Safety Ltd
  - Safety Policy document
  - Reports of inspections
  - Editable document library
  - Facility to create new users within Specialised Engineering Products Ltd
- An Annual Safety Review in which we are audited against our safety management system.
- The creation and updating of this health and safety policy.
- Access to a duty advisor over the phone for day to day safety queries.
- Accident investigations for situations where the injured party is an employee of Specialised Engineering Products Ltd.
- A monthly newsletter to enable Specialised Engineering Products Ltd to stay up to date with current safety news.
- Access to an Annual Safety Forum that includes industry specific presentations, strategy updates and opportunities to network with similar organisations.
- Free seminars and workshops on live issues.
- Exclusive preferential fees for other safety services.

#### Safety Management System (SMS)

HCS Safety Ltd have provided a Safety Management System (SMS) which is based on the principles of Plan, Do, Check, Act outlined within the Health & Safety Executive's guidance document HSG 65.

Blank forms to populate the SMS are found in the library section of SafetyNet.

The SMS is divided into broad headings as follows:

- Competent Advice
- Health & Safety Policy
- Competence and Consultation
- Working Safely
- Monitoring and Recording

## **Reviews and Updates**

HCS Safety Ltd will conduct an Annual Safety Review each year to monitor the extent to which we are complying with the requirements of our SMS. The review will be attended by our HCS Safety Ltd advisor and at least one member of senior management. The review will involve discussion of the previous year's safety performance, any updates needed for this policy, future training requirements and any other safety or health needs that are relevant.

The policy will be updated within two weeks of the Annual Safety Review taking place.

### **Date of last Annual Safety Review: 14 March 2023**

An interactive version of the Annual Safety Review report will be available to view on the SMS tab of our SafetyNet portal. Actions may be closed out by adding comments to the observations and advice given.

Selected personnel within Specialised Engineering Products Ltd will stay up to date on matters of health and safety by receiving a monthly newsletter from HCS Safety Ltd and attending the Annual Safety Forum. In addition to these mandatory updates, seminars will be available throughout the year as well as any other training. A suitable member of staff will attend the seminars as appropriate.

Newsletters will either be distributed to the Company personnel or displayed on noticeboards. They can be downloaded from SafetyNet at any time.

## **Risk Assessments and Method Statements**

Specialised Engineering Products Ltd ensures that risk assessments are carried out for tasks that involve significant risks to employees or others. Any self-employed personnel working on Specialised Engineering Products Ltd's behalf will be required to work in accordance with these risk assessments. Subcontractors are responsible for carrying out their own risk assessments which will be reviewed and approved prior to them being permitted to start work.

The person within Specialised Engineering Products Ltd responsible for ensuring that risk assessments are carried out to a suitable and sufficient standard and are updated on a regular basis is Richard Andrews.



The following procedure will be used to write risk assessments:

- identify hazards and who could be affected.
- evaluate risks, taking into account the likelihood and severity.
- control the risks, using the principles of prevention (see below).
- monitor the effectiveness of the control measures.
- review periodically and as necessary.

Method statements may be required in addition to risk assessments. These method statements outline the safe working procedures and will include the control measures detailed in the risk assessments.

Our approach to risk management will follow the principles of prevention below:

- avoid risks at source.
- evaluate those risks which cannot be avoided.
- combat risks at source.
- adapt the work to the individual, especially with regard to the design of workplaces and the choice of work equipment.
- adapt to technical progress.
- replace the dangerous by the non-dangerous or less dangerous.
- develop a coherent overall prevention policy, which covers technology, organisation of work, working conditions, social relationships and the influence of factors relating to the working environment.
- give collective protective measures priority over individual protective measures.
- give appropriate instructions to employees.
- use personal protective equipment as the last resort in risk control.

Risk assessments and method statements (RAMS) will be communicated to all personnel affected by the risks. Each of the relevant personnel will sign to confirm that they understand the contents and confirm that they will be working in accordance with it.

## **Health Surveillance**

It is the aim of Specialised Engineering Products Ltd that all employees are able to carry out their working duties without risks to their health. Health surveillance will be undertaken to monitor the effectiveness of control measures.

All employees of Specialised Engineering Products Ltd will be provided with a questionnaire which should be completed and returned to the office. The questionnaire will highlight where additional health surveillance is required.

All answers provided in the questionnaire will be held in confidence under the requirements of the Data Protection Act 2018.

Any issues identified during the surveillance process will be discussed with the employee in question and Megan Smith. Appropriate action will be taken to protect employees from further risk and where possible to arrange occupational health support services.

## **Training**

Specialised Engineering Products Ltd recognises the importance of providing all our employees with adequate health and safety training.

On recruitment, all personnel are assessed for their individual training needs. Information and certification will be obtained for previous training received, and any further training required is identified and recorded on the training matrix. The training matrix is maintained regularly to ensure that it is kept up to date. The training matrix is maintained by the Business Improvement Manager and Production Managers.

### **Induction Training**

All personnel will be required to attend a safety induction prior to starting work for or on behalf of the Company. Induction training into the Company will include:

- the Company's health and safety policy.
- procedures for reporting of accidents and near misses.
- risk assessments and safe methods of work.
- first aid arrangements.
- sources of health and safety information.
- correct use of personal protective equipment where required.
- the role and function of the Company health and safety consultant.
- safety consultation procedures.

### **General Safety Training**

General awareness of safety responsibilities is important for personnel at all levels. Specialised Engineering Products Ltd has adopted the IOSH scheme and also utilises iHasco online training as well as bespoke in-house training for the provision of safety awareness training for employees at all levels:

- 1-day IOSH Working Safely for Team Leaders and Leading Hands.
- 3-day IOSH Managing Safely for Production Managers.
- 1-day IOSH Leading Safely for Directors.
- basic health and safety awareness.



- knife awareness.
- COSHH.
- fire awareness.

### **Hazard Specific Training**

Specific training will be given to those who require it. This may include:

- forklift.
- first aid.
- fire warden.
- manual handling.
- individual equipment processes.

### **Consultation and Communication**

The Company will ensure that it takes a proactive role to promote the content, guidance and benefits of this policy by communicating the contents and responsibilities at induction.

The Company will encourage feedback from our employees and third parties about the measures enforced and the reasoning behind this policy and safe working practices.

All employees are encouraged to feedback on any health and safety issues they may have and where they believe the Company can improve on the current procedures. During the communication and consultation processes, particular emphasis will be placed on:

- the Company's commitment to health and safety.
- feedback on risk assessments and method statements.
- health and safety training requirements.
- the responsibilities of employees to co-operate and work safely.
- the contents of this policy, such as safe working procedures, etc.
- specific role-based issues.

The Production Managers will record any issues raised and these will be discussed during management meetings and any actions taken will be relayed back to the employee.

### **Management of Contractors**

Specialised Engineering Products Ltd acknowledges the duty to control, coordinate and monitor the activities of all other contractors under our control. Specialist subcontract companies will be engaged by the Company as and when required. These organisations will be required to pass the core criteria for demonstrating competence as set out in PAS 91:2013.

Specialised Engineering Products Ltd will ensure that contractors possess the appropriate skills, knowledge and experience to do the job safely and without risk to health and safety. To achieve this the contractor will need to complete a health and safety questionnaire before engagement. A health and safety appraisal of the contractor's procedures and health and safety documentation will be carried out, which in some cases may involve an audit of the contractor.

Alternatively, if the contractor can demonstrate that they hold an accreditation with a member of the Safety Schemes in Procurement Forum (SSIP), this will exempt them from the health and safety part of the questionnaire.

All contractors will attend a pre-start meeting to a prepared agenda and minutes of the meeting will be taken. Information will be exchanged between all parties in order to inform the management of the work.

## **Accidents**

Accident reporting is not only a legal requirement but also a necessity to ensure a safer future working environment for all employees, customers and visitors to the organisation.

All accidents, no matter how small, will be recorded in the accident book. The Business Improvement Manager will be informed as soon as possible after the incident. The contact number to call is 01794 830757.

If there is a possibility that an accident, dangerous occurrence or diagnosis of an occupational disease may be reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR), call HCS Safety Ltd for advice immediately.

Specified injuries or fatalities must be reported to the HSE immediately and should be notified by phone on 0345 300 9923.

Situations where the injured person is unable to carry out their normal work for 7 days or more must be reported to the HSE within 15 days of the injury being sustained. The HSE may be contacted via the internet at <http://www.hse.gov.uk/riddor/report.htm>.

Richard Andrews will be responsible for informing the HSE of all reportable incidents and for contacting HCS Safety Ltd.

Accidents that are reportable under RIDDOR will be investigated by HCS Safety Ltd and a report produced to identify the causes and make recommendations to prevent a recurrence. This service forms part of the member services agreement and there is no additional charge for accident investigations that are reportable under RIDDOR.

Accidents will be discussed at regular safety meetings and publicised to our employees if appropriate so that others can learn from these events.

Below is an outline of what injuries and dangerous occurrences are reportable under RIDDOR.



### **Specified injuries to workers**

- a fracture, other than to fingers, thumbs or toes.
- amputation of an arm, hand, finger, thumb, leg, foot or toe.
- permanent loss of sight or reduction of sight.
- crush injuries leading to internal organ damage.
- serious burns (covering more than 10% of the body, damage to the eyes, respiratory system or other vital organs).
- scalpings (separation of skin from the head) which require hospital treatment.
- unconsciousness caused by head injury or asphyxia.
- any other injury arising from working in an enclosed space, which leads to hypothermia, heat-induced illness or requires resuscitation or admittance to hospital for more than 24 hours.

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

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

### **Dangerous occurrences**

A full list of reportable dangerous occurrences is available on the HSE website. These include:

- the collapse, overturning or failure of load-bearing parts of lifts and lifting equipment.
- plant or equipment coming into contact with overhead power lines.
- explosions or fires causing work to be stopped for more than 24 hours.
- the complete or partial collapse (including falling, buckling or overturning) of a substantial part of any scaffold more than 5 metres in height.
- structural collapse – the collapse or partial collapse of any building involving over 5 tonnes of material or a collapse of any false-work.
- failure of a pressure vessel.
- serious electrical incidents causing explosion or fire.

### **Reportable occupational diseases**

- carpal tunnel syndrome.
- severe cramp of the hand or forearm.
- occupational dermatitis.
- hand-arm vibration syndrome.
- occupational asthma.

- tendonitis or tenosynovitis of the hand or forearm.
- any occupational cancer.
- any disease attributed to an occupational exposure to a biological agent.

## **Fire**

Specialised Engineering Products Ltd will ensure that a suitable and sufficient fire risk assessment is carried out by a competent person and any recommendations are acted upon. This will be updated annually and after any notable change to the layout or use of the premises. The Business Improvement Manager is responsible for ensuring that a sufficient number of trained staff are available to manage the situation in the event of a fire. This will include the testing of evacuation procedures and logging of any comments arising from the evacuation drill.

Information regarding the identity and location of the fire wardens, the position of fire extinguishers and routes of escape can be found on the safety notice board.

## **Housekeeping**

The importance of good housekeeping should not be underestimated. As well as improving morale, quality and efficiency and reducing fire risk, good housekeeping is essential in reducing slips, trips and falls at any work location.

Work activities will be carefully planned to ensure the work areas are not overcrowded. The need for good housekeeping will be included in risk assessments and may include the management of people, tools, trailing leads, packaging and waste.

It is the responsibility of all personnel to keep their work area tidy and this is emphasised during the Company induction.

The Production Managers will ensure that arrangements are in place for the removal of accumulated waste and to ensure that provision is made for safe and defined stacking of materials and storage of equipment.

## **Welfare Facilities**

As an employer, Specialised Engineering Products Ltd is required to ensure that welfare facilities exist for the use of our employees. It is the employer's duty under both Section 2(2)e of the Health and Safety at Work etc. Act 1974 and The Workplace (Health, Safety and Welfare) Regulations 1992 to ensure that work is not carried out in the absence of these facilities.

The Regulations require the following facilities to be in place and maintained in a reasonable state.

- sanitary conveniences.



- chairs with backs.
- washing facilities.
- drinking water.
- facilities for rest and preparing food.
- changing rooms with lockers.

Our workers are expected to play their part in keeping the welfare facilities tidy and report any defects with the facilities (such as malfunctioning water heaters or blocked toilets) to the Business Improvement Manager as soon as possible.

## **First Aid**

The name of the first aiders within the company premises will be displayed on the safety notice board. The first aiders will regularly check and replenish the first aid boxes when required. They will also be responsible for ensuring that accidents are recorded in the accident book and reported to Richard Andrews.

The first aid kit for the company premises are located in the canteen with eye wash kits available in all workshop areas.

## **Personal Protective Equipment (PPE)**

Specialised Engineering Products Ltd will ensure that suitable PPE is provided to their employees who may require it to control risks to their health and safety while at work.

Specialised Engineering Products Ltd will ensure that PPE is:

- of a standard that will adequately protect the person from the risks.
- replaced when worn out.
- properly looked after by the person using it.
- compatible with other types of PPE, if more than one item is required.
- regarded as the last resort in risk control.

## **Drugs and Alcohol**

The Company regards the promotion of health and safety matters as a mutual objective of both management and employees. The effective management of drug and alcohol abuse is an important part of this. Specialised Engineering Products Ltd will:

- not knowingly permit any employee, contractor or self-employed person working on the Company's behalf, to report for work or attend work premises under the influence of alcohol or drugs, nor to consume these whilst on duty or on our premises.

- implement control measures to prevent, as far as reasonably practicable, such people reporting for work or attending work premises when affected by drugs or excess alcohol or consuming drugs or alcohol at work.
- provide a positive approach to those persons seeking help or guidance in overcoming alcohol and/or drug related problems, but only where these problems are raised at any time prior to being selected for random testing.
- not knowingly employ or retain any person, directly or indirectly, who has been justifiably dismissed by any employer for drug and/or alcohol related offences within the previous 12 months.
- take suitable action, usually dismissal or termination of contract, against anyone testing positive to alcohol or drugs in breach of this policy.

Any person found to have tested positive after any drug or alcohol test will be immediately suspended from the work in which they are engaged, pending a full investigation.

Any person, testing positive for drugs or excess alcohol, or refusing to take a test will face sanctions up to and including termination of contract.

## Health Risk Management

Specialised Engineering Products Ltd is fully aware of the responsibility for ensuring that health risks are identified and controlled to protect our employees whilst working for the Company. The policy for managing these risks are as follows:










### Hazardous Substances (COSHH)

Specialised Engineering Products Ltd will adhere to the hierarchy of risk controls to minimise potential health effects to our employees. Specialised Engineering Products Ltd will:

- make an inventory of chemicals used in our processes.
- rationalise these chemicals to reduce the number of different chemicals.
- select less hazardous chemicals where it is reasonably practicable to do so.
- obtain Material Safety Data Sheets of all chemicals.
- produce COSHH Assessments for these chemicals, ensure the control measures stated are adhered to and monitored where necessary.
- communicate risks effectively to our employees and others who may be affected.

A range of COSHH assessments are available to download from the library within SafetyNet. These will be made specific to Specialised Engineering Products Ltd processes.

Hazard warning markings on containers must also be heeded. A summary of the common warning signs follows:

	Toxic		Harmful		Harmful to the environment
	Gases under pressure		Explosive		Oxidising
	Corrosive		Causes long term health effects		Flammable

### Asbestos

Asbestos is a fibrous mineral that can cause fatal lung diseases if inhaled. It was used extensively in buildings up to the early 1980s and is also found in buildings up to as late as 1999. The material cannot be identified by appearance only and is often concealed by other materials or coatings.



The Company premises were built before 2000 and asbestos is not known to be present in the building. An asbestos survey has been carried out and a register is provided and made available to any contractor working on the Company premises.

## **Welding Fumes**

Welding fumes are formed when a metal is heated above its boiling point and its vapours condense into very fine solid particles. Welding fumes contain a mixture of airborne gases, fine particles from the electrode and the material being welded.

The processes that would cause most concern for Specialised Engineering Products Ltd work activities include:

- MIG welding – produces Chromium fumes (WEL=0.5mg per m<sup>3</sup> over an 8-hour period).
- arc welding – fumes produced mainly from filler wire when exposed to the electric arc.
- welding of material involving the heating of coatings (paints), oils, plating, galvanized steel and rust inhibitors can change the composition of welding fumes making them more hazardous.

These fumes can cause several serious ill health conditions if inhaled, including:

- metal fume fever (caused by inhaling irritant gases such as oxides of nitrogen and ozone).
- COPD (Chronic Obstructive Pulmonary Disease).
- occupational asthma.
- lung Cancer.

COSHH Assessments must be undertaken for all products required for the process of welding as well as those substances that may be generated by the process.

In order to reduce exposure to hazardous substances, Specialised Engineering Products Ltd will:

- implement the specific control measures indicated by the COSHH Assessment.
- ensure the use of local exhaust ventilation when working inside enclosed or poorly ventilated spaces to extract welding fume.
- issue the correct RPE – (Filtering Face-Piece) FFP3 masks will filter out 95% of the particulate. This may be appropriate when working outside or in a very well-ventilated area. However, these masks do not prevent against exposure to hazardous gases, therefore adequate ventilation will also be required.
- use welding masks with built in RPE, such as a belt mounted powered respirator with appropriate filter.
- make sure RPE is worn – by providing training and supervision.

## Noise

Excessive noise can cause permanent damage to your hearing. The damage is often gradual and is always irreversible. Even a small amount of hearing loss can have a debilitating effect on a person's quality of life. To reduce the risks of damage to hearing for our employees and others we will:

Assess the noise levels in our own premises and other places in which our employees work and act according to the table below.

Lower Exposure Action Value 80dB(A)	Carry out a noise assessment to identify sources and levels Reduce noise levels Provide hearing protection to employees who request it Maintain equipment to reduce noise outputs Provide training about noise
Upper Exposure Action Value 85dB(A)	Introduce controls to eliminate/reduce risk Provide hearing protection and ensure this is worn Create Hearing Protection Zones in work areas Provide health surveillance Provide training, information and consultation regarding noise
Daily Exposure Limit Value 87dB(A)	Exposure must not exceed this

When selecting work equipment, information on the noise (and vibration) output of the machine will be sought from the manufacturer or hire company. Quieter machines will be selected over inferior equipment.

Noise awareness training will include:

- how the ears work and how damage occurs.
- action levels and time limits.
- choosing hearing protection.
- estimating noise levels.

## Vibration

Exposure to excessive vibration can cause neurological, vascular, and musculoskeletal health problems. These conditions are known collectively as Hand-Arm Vibration Syndrome (HAVS) which can become severely disabling if ignored.

A very serious form of HAVS is Vibration White Finger (VWF) which can result from the transmission of vibration from a vibrating implement (such as impact drills) to the hands, occurring as a result of medium to long term exposure. This condition is not treatable and therefore results in a permanent potentially life changing condition.



Exposure is measured on a points system which relates to Exposure Action Levels and Exposure Limit Values. Specialised Engineering Products Ltd will protect our employees by taking the following action at the levels indicated below:

<100 points (below Exposure Action Value)	Reduce exposure to lowest reasonably practicable level Consider vibration when purchasing and hiring tools Provide awareness training in vibration hazards Aim to ensure employees remain below the Exposure Action Value
100 - 400 points (at or above Exposure Action Value)	Introduce controls to eliminate/reduce risk including limiting exposure time Consider vibration when purchasing or hiring tools Provide awareness training in vibration hazards Keep records of vibrating equipment use Provide health surveillance
>400 points (Exposure Limit Value)	Take immediate action to reduce exposure below the limit value Continue to enact EAV measures

Information on vibration magnitude and safe exposure times will be sought from the manufacturer or hire company. Specialised Engineering Products Ltd will take into account the specifics of condition and use that may affect vibration output.

## Manual Handling

Manual handling can cause musculoskeletal health effects. Specialised Engineering Products Ltd will operate according to the hierarchy below:

- avoid manual handling where reasonably practicable through good planning and organisation of work.
- mechanise the movement of materials and plant by utilising equipment such as forklifts.
- conduct a manual handling risk assessment taking into account the individual(s) concerned, the nature of the load, the task to be undertaken, and the environment in which the manual handling will take place.
- utilise manual lifting aids where possible such as pallet trucks and trollies.
- provide training in safe lifting techniques.

## Workplace Stress

Workplace stress is the harmful reaction some people have to undue pressures and demands placed on them by their work. It is a risk like any other and employers are responsible for preventing and managing it.

Specialised Engineering Products Ltd aims to create an open and honest culture whereby employees feel empowered to be honest about their experiences. Open dialogue is vital in order to be able to accurately assess risk and put appropriate control measures in place.



Specialised Engineering Products Ltd aims to create and promote a workplace environment that supports and promotes the mental wellbeing of all our employees. We acknowledge that certain working conditions and practices can negatively affect employees' mental wellbeing, including aspects of work organisation and management, environmental and social conditions that have the potential for psychological as well as physical harm.

Specialised Engineering Products Ltd will endeavour to work to the HSE's management standards in order to reduce the risk of workplace stress. These standards aim to tackle the following primary sources of stress at work.

- Demands – this includes issues such as workload, work patterns and the work environment.
- Control – how much say the person has in the way they do their work.
- Support – this includes the encouragement, sponsorship and resources provided by the organisation, line management and colleagues.
- Relationships – this includes promoting positive working to avoid conflict and dealing with unacceptable behaviour.
- Role – whether people understand their role within the organisation and whether the organisation ensures that they do not have conflicting roles.
- Change – how organisational change (large or small) is managed and communicated in the organisation.

Specialised Engineering Products Ltd will undertake research among employees to gauge how well they believe the management standards are being implemented.

## **Mental Health First Aid**

Mental ill health and stress are associated with many of the leading causes of disease and disability in our society. Promoting and protecting the mental wellbeing of our workforce is important for individuals' physical health, social wellbeing and productivity.

Specialised Engineering Products Ltd's vision is to normalise society's attitudes and behaviours around mental health, by developing the skills needed to look after our own and others' wellbeing.

Many factors in the workplace influence the mental wellbeing of individual employees, particular departments or the company as a whole. Understanding and addressing the factors which affect people's mental wellbeing at work have a wide range of benefits, both for individuals and the company.

Mental wellbeing in the workplace is relevant to all employees and everyone can contribute to improved mental wellbeing at work. Addressing workplace mental wellbeing can help strengthen the positive, protective factors of employment, reduce risk factors for mental ill health and improve general health.

Coping with stress in the workplace starts with being able to have a conversation with your manager, and in a mentally healthy organisation everyone should feel comfortable talking about stress.

As a company we aim to create and promote a workplace environment that supports and promotes the mental wellbeing of all our employees. We acknowledge that certain working conditions and practices can negatively affect employees' mental wellbeing, including aspects of work organisation and management, environmental and social conditions that have the potential for psychological as well as physical harm.

To achieve those aims we will endeavour to:

- give employees information on and increase their awareness of mental wellbeing.
- offer employees flexible working arrangements, where they can be accommodated, that promote their mental wellbeing.
- give all staff the opportunity to influence how they do their jobs, scope for varying their working conditions as far as possible, and opportunities to develop and fully utilise their skills.
- set employees realistic targets that do not require them to work unreasonable hours.
- ensure all staff have clearly defined job descriptions, objectives and responsibilities and provide them with good management support, appropriate training and adequate resources to do their job.
- manage conflict effectively and ensure the workplace is free from bullying and harassment, discrimination and racism.
- establish good two-way communication to ensure staff involvement, particularly during periods of organisational change.

To develop a culture based on trust, support and mutual respect within the workplace, Megan Smith has been trained in Mental Health First Aid and she has the skills to spot the signs of mental illness and the confidence to step in and support a person who needs assistance.

## **New and Expectant Mothers**

Once informed in writing that an employee is pregnant, Specialised Engineering Products Ltd will undertake a risk assessment with the employee to assess specific risks for new and expectant mothers. These risks can be from any process, working condition or physical, biological or chemical agents. All aspects of the role will be risk assessed and consideration will be given to:

- lifting or carrying of heavy loads.
- standing or sitting for long lengths of time.
- exposure to infectious diseases.

- work-related stress.
- workstations and posture.
- threat of violence in the workplace.
- long working hours.
- excessively noisy workplaces.

Specialised Engineering Products Ltd will regularly monitor and review any assessment made to take into account possible risks that may occur at different stages of pregnancy.

Specialised Engineering Products Ltd will also take into account, during the specific risk assessment, any medical advice from the new and expectant mother's General Practitioner or midwife about their health and make reasonable adjustments to their working conditions accordingly.



# Safety Risk Management

## Office Safety

Specialised Engineering Products Ltd appreciates that accidents and ill health effects can result from working in the office and will endeavour to reduce the risk by the following means:

- wastepaper bins and packing materials will be removed daily.
- cables will be managed to defined routes so that they do not present a trip hazard or an overload to a circuit.
- training will be provided to employees in the correct use of fire extinguishers, where required.
- lighting levels will be suitable for the tasks being undertaken.
- shelving and storage areas will be provided to reduce the possibility for stretching or awkward lifting.
- cleaning chemicals will be kept away from foodstuffs in the kitchen area.

## Display Screen Equipment (DSE)

Specialised Engineering Products Ltd will analyse and assess workstations to reduce risks to health. Users of DSE equipment will be asked to carry out a DSE Assessment to identify any areas that require attention. Specialised Engineering Products Ltd will ensure that:

- workstations comply with the requirements of schedule 1 of The Display Screen Equipment Regulations 1999 in relation to the equipment used. This will include the desk, chair, screen and other relevant items.
- the daily work routine of users allows for breaks away from the screen and/or changes in activity.
- eye and eyesight tests are carried out by a competent person on a regular basis, for employees who use display screen equipment.
- if deemed appropriate by the person carrying out the tests, corrective visual appliances will be provided by the Company, if this is required under the regulations.
- training in the use of display screen equipment will be provided to users.

## Driving at Work

Specialised Engineering Products Ltd understands its responsibilities to ensure the safety of employees while they are driving on Company business. The Company provides all personnel, expected to drive as part of their work, with a driver's handbook based on the above document, which details their responsibilities when driving at work.

Company vehicles are managed by Megan Smith who ensures all insurances, driving licences, services and MOTs are provided and regularly reviewed.

Megan Smith will carry out regular monitoring of the procedure for driving at work to ensure its effectiveness and to ensure all documentation is up to date.

All drivers will be expected to carry out daily and weekly checks to their vehicle in accordance with the Company procedure and driver's handbook and report back any issues to Megan Smith.

### **The Driver**

- drivers must hold a valid drivers' licence that covers the vehicle being driven (HGV, PSV if required).
- drivers must also understand the policy on work related road safety and what is expected of them.
- high risk drivers (e.g. those with high annual mileage, poor accident records, or young drivers) need to be prepared to undergo further training.
- drivers should know how to carry out routine safety checks such as those on lights, tyres and wheel fixings.
- drivers should know how to correctly adjust safety equipment, e.g. seat belts and head restraints.
- drivers should know how to check washer fluid levels before starting a journey.
- drivers should know how to ensure safe load distribution, e.g. when delivering materials to site.
- drivers should know what actions to take to ensure their own safety following the breakdown of their vehicle.
- drivers should hold the vehicle safety handbook within their vehicles so that it is available when needed.
- drivers should be aware of the dangers of fatigue and should know what they should do if they start to feel sleepy.
- drivers must be able satisfy the eyesight requirements set out in the highway code.
- drivers should not drive, or undertake other duties, while taking a course of medicine that might impair their judgment. In cases of doubt they should seek the view of their GP.

### **The Vehicle:**

- vehicles must be fit for the purpose for which they are used.
- privately owned vehicles should not be used for work purposes unless they are insured for business use and, where the vehicle is over three years old, they have a valid MOT.
- adequate maintenance arrangements should be in place and maintenance and repairs should be carried out to an acceptable standard.
- planned/preventative maintenance should be carried out in accordance with manufacturer's recommendations. Remember an MOT certificate only checks for basic defects and does not guarantee the safety of a vehicle.



- drivers should know how to carry out basic safety checks and ensure this is done at regular intervals.
- vehicles should not exceed maximum load weight.
- goods and equipment which are to be carried in a vehicle must be properly secured, e.g. loose tools can distract the driver's attention if allowed to move around freely.
- windscreen wipers must be inspected regularly and replaced as necessary.
- safety equipment must be appropriate and in good working order.
- seatbelts and head restraints must be fitted correctly and function properly.
- users should be aware of recommended tyre pressures and how to adjust headlamp beam to compensate for load weight.

### **The Journey**

- employees should plan routes to use the safest roads.
- employees should take into account any overhead or width restrictions when planning their journey.
- employees should never drive when they are tired. Sleep related accidents are most likely to occur between 2.00am – 6.00am and also 2.00pm – 4.00pm.
- employees should not be driving for excessive periods of time or excessive distances without a break.
- employees should be aware of weather conditions and act accordingly.
- employees should ensure their vehicle is equipped with appropriate items in the event of severe weather.

### **Construction Arrangements - CDM**

Under the requirements of the Construction (Design and Management) Regulations 2015 (CDM 2015), Specialised Engineering Products Ltd, will take on the duties of the Client for work on Company premises. The following summarises these duties.

#### **Responsibilities for all parties under CDM 2015**

For all roles undertaken, we will:

- only appoint Designers or Contractors who possess the necessary skills, experience, training and organisational capacity to carry out the work safely.
- cooperate with others involved in all projects to promote health and safety standards.
- inform their workforce and all others on site of the need to report to site management anything which is likely to endanger their own health or safety or that of others.
- ensure that information is provided in a comprehensible form and as soon as is practicable.



## **Plant and Equipment**

The proper selection and maintenance of mechanical plant and equipment and the provision of information, instruction and training in their use are requirements of the Provision and Use of Work Equipment Regulations 1998.

The selection of plant and machinery will be the responsibility of the Production Managers, who will ensure that it is suitable for its purpose and that the work area, ground conditions and public safety have been considered prior to it starting work.

Only authorised persons will be permitted to operate plant. Authorisation will only be given to operatives in possession of a certificate of training achievement issued by a recognised training authority. Certificates of competence must be held by all operators of major items of plant such as the forklift truck.

The Production Managers will ensure copies of certificates of conformity or Thorough Examination reports are available for all items of plant.

## **Working with Power Tools**

The people within the Company with responsibility to oversee the safety of tools are the Production Managers; however, the operatives must ensure the safe use, care, and maintenance of their own equipment. Records of regular inspections of tools and other work equipment including access equipment are an important part of the SMS.

### **Electrical Tools**

Only trained and competent personnel will be permitted to operate power tools. The policy of the Company for the provision and use of power tools is to ensure:

- all tools will be inspected before use, and regularly whilst in use.
- all electrical tools will be tested and examined by a competent person, who will issue a certificate of safety.

The Production Managers are responsible for ensuring that portable appliance testing (PAT) is carried out on a regular basis.

### **Hand Tools**

Individual operatives are responsible for ensuring that their hand tools are kept in good order. They will ensure the following:

- tools will always be kept in good working condition, kept clean and ready for use.
- tools will be stored appropriately in toolboxes or racks with cutting edges protected.
- tools will be checked frequently to ensure that handles are secure, and guards and covers are in place.

- the use, suitability and condition of work equipment and tools will be regularly monitored by the Production Managers during their inspections.
- personnel are required to report any defects to the Production Managers and not to use any items that are in poor condition.

### **Use of Abrasive Wheels**

Abrasive wheels are used by the Company on occasions and can be particularly hazardous. For this reason, only persons trained in the mounting and use of abrasive wheels will be permitted to use them. Discs will be kept in a safe place and discarded as soon as they begin to show signs of excessive wear or unevenness of edge.

PPE will be provided and worn by those using abrasive wheels. If following risk assessment, others who have to work in the vicinity may be at risk from flying debris, screens will be considered, or PPE provided to those working in the area. Eye protection to be worn must comply with BS EN 166B.

Dust will be controlled, wherever possible, and where water suppression is not an option, a vacuum system will be used. Dust masks to a suitable standard (FFP3) will always be worn in order to reduce the risk of respiratory health illnesses.

### **Hot Works**

All hot works will be strictly controlled, and a permit-to-work procedure will be in place before any work commences. This will be included into any site-specific risk assessment which may include control measures as described below:

- the work area will be surveyed prior to the start of any works to ensure it is cleared of all loose combustible material.
- work will be planned to ensure all work areas are cleared of personnel with signs and barriers in place to ensure these areas cannot be accessed during the hot work activities.
- all necessary fire-fighting equipment will be available and will have been checked and deemed suitable extinguishing media.
- a telephone will be available at all times for emergency and will be readily accessible from the work area.
- all hot works will cease not less than one hour before the end of each day and a thorough inspection will be carried out in the vicinity of the work to ensure there is no risk of fire.

### **Pressure Equipment and Pressure Systems**

The Company will ensure that all work associated with pressure equipment and pressure systems are carried out in accordance with the Pressure Equipment Regulations 1999 and the Pressure Systems Safety Regulations 2000.

The Company will ensure that where any part of a pressure vessel and its related systems is subject to installation, modification, repair or maintenance work it shall be commissioned,



re-commissioned or decommissioned in accordance the manufacturer's instructions and any written scheme of examination.

Any work to modify an installation or to carry out maintenance will require a permit to work, which will be managed by a competent person.

Examples of pressure systems and equipment used by the Company are:

- compressed air systems (fixed and portable).
- pipe work and hoses.
- pressure gauges and level indicators.

When installing new equipment, ensure that it is suitable for its intended purpose and that it is installed correctly. This requirement can normally be met by using the appropriate design, construction, and installation standards and/or codes of practice.

### **Written Schemes of Examination**

Each item of plant or equipment that forms a pressure system, that operates under pressure and contains a relevant 'fluid' is to have a written scheme of examination.

A schedule of items of equipment and parts of the plant to be included, will be prepared and monitored by the Production Managers. This will include all protective devices, and will also include pressure vessels, and parts of pipework, which if they failed could give rise to danger.

The scheme will also specify whether the examination is in-service or out-of-service and how often the system is to be examined.

### **Workplace Transport Safety**

Specialised Engineering Products Ltd will ensure that premises under Specialised Engineering Products Ltd's control are designed and maintained to ensure provision of suitable segregation of vehicles and people.

- separate entrances and exits will be provided for vehicles and pedestrians where possible, and vision panels will be installed to doors that open onto vehicle traffic routes.
- delivery vehicles to the Company premises will be under the control of the Production Managers, who will ensure that safe movement of vehicles and pedestrians can be achieved and maintained at all times.

### **Workshop Safety**

The Company recognises that operations carried out in the workshop are potentially hazardous and need close management, control and supervision in order to maintain the safety of workers. The Production Managers have specific responsibilities which are detailed in the responsibilities section of this policy.



Maintenance of machinery will be carried out by the Production Managers, who will ensure:

- daily, weekly and monthly checks and maintenance on machines are carried out in accordance with manufacturers' guidelines. The Company will take these standards as the basis for its own continuing improvement in machine safety.
- daily checks are carried out by the machine operators; these will include daily cleaning with the aid of the extraction equipment.
- weekly checks and maintenance will be carried out by the machine operators and any other requirements as stated by the manufacturers.
- thorough monthly checks and maintenance will be carried out.

Particular care will be given to access routes and good housekeeping, including:

- keeping access routes clear in the workshop.
- not allowing materials to build up in any areas that may impede access, particularly fire exits or any other external doors.
- access to machine controls will always be kept clear, as will access to any electrical sockets or controls.
- The Local Exhaust Ventilation system must always be accessible.
- Any fire extinguishers and first aid equipment must always be accessible.