



Health and Safety Management System

SECTION A



HEALTH & SAFETY

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HEALTH & SAFETY POLICY STATEMENT

Startright recognises and accepts its duties and obligations in complying with the Health and Safety at Work Act 1974 and associated legislation as it applies to the business conducted by Startright Limited.

Startright also recognises its civil duty of care to its employees and others who may be affected by our business activities.

Startright will so far as is reasonably practicable ensure the health, safety and welfare of its employees and subcontractors whilst at work by ensuring: -

1. The provision of plant and equipment that is safe and free from defect
Or danger
2. The provision of systems of work that are safe.
3. The provision of suitable and sufficient information, instruction, training and supervision for all employees visitors and sub contractors (where applicable).
4. The provision and maintenance of a safe place of work ensuring safe access and egress.
5. The provision of a safe, healthy working environment.
6. The provision of suitable and sufficient welfare facilities for all Employees and visitors.
7. All accidents / near misses are reported and investigated and appropriate actions taken.

Startright recognises the importance of risk assessments as a management tool to identify problems and eliminate or minimise risks to employees and others affected by our act or omissions and as such all work is assessed at least once every 12 months or more frequently where there has been a significant change in the work activity or where the original risk assessments are considered no longer valid.

Startright recognises the importance of effective consultation with its staff, contractors and others and will consult and discuss with them as and when required in the pursuance of improving health and safety standards.

This policy makes reference to employees are included whereby in the pursuance of health and safety they come under the direct control of Startright and any other party that come under the direct control of Startright where there can be an effect on the employees health and safety due to the activities and instructions given by Startright.



In line with good health and safety management this policy will be formally reviewed on a 12 monthly basis to ensure it is current.

The Health & Safety Policy will be made available to all employees and visitors who will be encouraged to read and understand it. Any employees or other relevant party not able to read it or who have difficulty in understanding any aspect of the policy must ask for clarification from their Supervisor.

Employees are required to sign to say they have read, understand and will abide by Startright policies and procedures.

Startright recognises that good standards of health, safety and welfare do not happen by chance therefore all employees are encouraged to work together by reporting hazards and risks and taking effective action to minimise risks where practicable. Good communication is essential for making health and safety work.

Management structures allow for employees to communicate health and safety concerns with their Supervisor.

All employees have a direct access through to the relevant office where advice can be sought on health and safety matters from their Supervisor.

Startright has a proactive approach to health and safety at work and recognises that our employees are our best assets. We therefore endeavour to protect them from accidents or ill health not only from the aspects of complying with health and safety law but also from the humanitarian aspects of looking after valuable assets of the company.

Startright aims to achieve zero accident rates and although accepting this target is difficult to achieve will strive to achieve a constant reduction in accident rates.

Signed _____ **Date:01st January 2025**
Mr S Grice

Review Date:01st January 2026



Health and Safety Management System

SECTION

B

ORGANISATION FOR HEALTH & SAFETY



ORGANISATION FOR HEALTH & SAFETY

Mr S Grice (Operations Director)

has overall responsibility for health & safety throughout the company. Both Mr S Grice and Mr M Neville are committed to taking a pro-active approach to ensure the health, safety and welfare of staff, volunteers and visitors to Startright.



Health and Safety Management System

SECTION

C

RESPONSIBILITIES FOR HEALTH & SAFETY



HEALTH & SAFETY POLICY ORGANISATION

RESPONSIBILITIES FOR HEALTH & SAFETY

All employees and sub contractors have legal duties and responsibilities to comply with statutory legislation and the rules and regulations set by Startright.

Individual responsibilities are detailed as follows:

Directors : Mr S Grice and Mr M Neville

The Directors will ensure Startright's Health & Safety Policy has been prepared and effectively implemented and monitored. They will ensure the Policy is revised and updated at regular intervals.

They will ensure sufficient financial provisions are allocated for the implementation of the Health & Safety Policy and for matters arising that affect the health, safety and welfare of our employees and visitors.

They will ensure that he keeps updated on health and safety matters as they affect his employees and will ensure he is updated on current Health & Safety law approved codes of practice and best practices.

They will ensure responsibility for Health & Safety has been properly assigned and is accepted and understood throughout Startright.

They will ensure the Health & Safety Policy is being strictly adhered to and will take the appropriate action when required to ensure the health, safety and welfare of his employees or visitors are not compromised.

They will consult with their employees and visitors any information that is in the pursuance of improving their awareness of Health & Safety at work.

Signed _____ Date: 01st January 2025
Operations Director: Mr S Grice

Signed _____ Date: 01st January 2026
Strategic Director: Mr M Neville



HEALTH & SAFETY POLICY ORGANISATION

RESPONSIBILITIES FOR HEALTH & SAFETY

Health and Safety Adviser

Will report directly to **The Directors** on matters relating to the administration of Health and Safety Systems, including maintenance of records.

Monitor the implementation of safe systems to ensure correct working practises can be adhered to by all company employees.

Advise on the measures to be taken that may be necessary in order to comply with, for example;

The Health and Safety at Work Act 1974

The Management of Health and Safety at Work Regulations 1999

The Health and Safety Workplace Regulations 1992

The Provision and Use of Equipment Regulations 1998

And any other relevant Health and Safety Statutory Instruments.

Will advise management of legislative changes where applicable and generally contribute advice when and where required which will maintain and enhance the company's good safety record. In particular the advisor will provide support in relation to:

1. Company Health and Safety Policy Document

2. Risk assessment records as applicable under:

- a) Management of Health and Safety Regulations 1999
- b) Regulatory Reform (Fire Safety) Order 2005
- c) Manual Handling Regulations 1992
- d) Display Screen Equipment Regulations 1992
- e) COSHH Regulations
- f) Personal Protective Equipment Regulations 1992
- g) Electricity at Work Regulations (PAT register)
- h) Accident/incident reports/records (RIDDOR 1995)
- j) Control of Noise at Work Regulations 2005

3. The maintenance of the appropriate records and draw the attention of the Directors to any new working practices and the subsequent implications.



HEALTH & SAFETY POLICY ORGANISATION

RESPONSIBILITIES FOR HEALTH & SAFETY

Employees

All employees must read and ensure they understand Startright's Health & Safety Policy.

The Health & Safety at Work etc. Act 1974 imposes legal duties on employees to:-

1. Take reasonable care for their own health & safety and for the health & safety of others who may be affected by their acts or omissions.
2. Co-operate with Startright's Rules and Regulations.
3. Not interfere with or misuse anything that is provided for their or others health and safety at work.
4. Co-ordinate and Co-operate with other employers working on the same site.

If employees do not follow the above duties they are committing a criminal offence and could be prosecuted and / or be subject to Startright's disciplinary procedures.

Startright recognises the importance of working together to achieve high standards of health, safety and welfare and will consult with employees and visitors on matters affecting their health & safety at work.

Employees and visitors must be safety conscious and where they notice something they think could be dangerous they must report it to their Supervisor or if they have the authority or ability to remove the danger they must do so as soon as they can.

Where a dangerous situation arises that cannot be dealt with immediately suitable warnings should be given, placing of barriers etc. to minimise the risks.

All employees and visitors should be aware of the risk assessments carried out on their place of work or work activities and must work to the system of work identified.



Health and Safety Management System

SECTION

D

ARRANGEMENTS FOR HEALTH & SAFETY



HEALTH & SAFETY POLICIES AND PROCEDURES

ARRANGEMENTS FOR HEALTH & SAFETY

- HS1** Fire Safety
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HEALTH & SAFETY

POLICIES AND PROCEDURES

HS1

Policy on Fire Safety

Startright recognises its duties under the Regulatory Reform (Fire Safety) Order 2005 and associated legislation and will ensure adequate means are provided for Fire Prevention and for Fire Protection.

A Fire Risk Assessment has been undertaken and will be reviewed annually or if significant changes are made either to the nature of work carried out or the structure of the building.

Fire evacuation procedures are available on site with clear instructions what to do in the event of a fire.

Startright provides and maintains sufficient quantities of Fire Extinguishers and fire blankets on site as required. All Fire Extinguishers are assessed for their suitability and maintained by a specialist contractor at least once every 12 months.

Emergency escape routes and exits are assessed to ensure they offer the safest and quickest means of escape and Startright will ensure a suitable number of freely and unobstructed fire exits are available at all reasonable times.

It is an absolute duty for all employees and visitors to ensure fire routes are kept clear when working or storing materials on site. Emergency exit doors must not be blocked, or locked to an extent where escape is restricted.

All fire escape routes will be clearly signed and all employees will ensure they know what emergency exists they should use and where the assembly points are.

Where disabled or special needs, people are within or likely to be within the premises, where required, special arrangements will be implemented to ensure their safe evacuation.

Fire doors are provided for the protection of life to hold back fire with intumescent smoke seals to hold back smoke. All fire doors must be kept closed at all times and should not be



wedged open or propped open by fire extinguishers, door wedges etc. Employees or visitors doing this may be putting their own life and the lives of their colleagues and others at risk and therefore must refrain from this and also inform their Supervisor when it is being practised.

"Prevention is better than cure" therefore all employees are instructed to prevent the build up of combustible materials where practicable and keep them away from sources of ignition.

Discarded cigarettes and matches are a significant source of ignition.

Startright policy on smoking at work must be observed.

Anyone smoking in a No Smoking Area will be subject to disciplinary procedures or from being excluded from site.

It is everyone's responsibility to ensure fires do not start on site therefore employees and visitors must report anything they feel creates a risk of fire or causes a risk to the safety of people in an emergency evacuation situation.

Use of flammable substances at work is strictly controlled and only the products approved for use at work can be used. Care must be taken to ensure flammable substances are stored away from sources of ignition and good hygiene must be practised to ensure overalls and hands are not contaminated with flammable substances.

Procedure to be followed in the event of a fire

- 1. Raise the Alarm**
- 2. The identified responsible person will call the fire service from a safe place.**
- 3. Leave by the quickest & safest exit.**
- 4. Fire wardens to check their areas to ensure everyone has left safely.**
- 5. Do not stop to collect personal belongings.**
- 6. Take trainees and colleagues with you.**
- 7. Close doors and windows on exit route.**
- 8. Assemble at the assembly point.**
- 9. Take roll call and await further instructions.**

Note where people with mobility problems designated people will be identified to either assist in their evacuation or to assist them to the safe refuge point



HEALTH & SAFETY POLICIES AND PROCEDURES

HS2

Policy on Accident and Incident Reporting and Recording

This policy outlines the procedures that are to be adopted when any employee, visitor or contractor experiences an accident, near-miss or dangerous occurrence on the company's premises.

It is the policy of the company to identify and investigate unplanned losses (accidents), their source and therefore their underlying causes.

To enable this objective to be achieved it is imperative that all accidents, irrespective of the resulting injury or damage, be reported according to the laid down procedures.

In order to avoid misunderstanding, the company deem an accident and near miss to be defined as:

- Accident-any event that results in personnel injury or damage to property, plant or equipment.
- Near-miss-an event which does not cause injury or damage but could have done so.

Accident Books

All accidents must be recorded in the Accident Book on site at the time or as close to the time of the accident as possible.

These accident books will be reviewed regularly by senior managers to ascertain the nature of incidents which have occurred in the workplace. This review will be in addition to an individual investigation of the circumstances surrounding each incident.



All near misses must be reported to the Directors as soon as possible so that action can be taken to investigate the causes and to prevent recurrence.

Reporting Procedure

- all accidents must be entered in the appropriate Accident Book either by the injured person or, if this is not practicable, someone else present at the time.
- An accident report form is also to be completed by the same person who should then give this form to the immediate supervisor of the injured person.
- The immediate supervisor must then:
 - Note that the accident has occurred
 - Ensure that the Accident Book has been correctly and fully completed
 - Immediately pass the Accident Report Form to the Directors.
- The Directors will then:
 - Ensure that the Reporting procedures outlined below are followed.
 - Ensure that the appropriate documentation is completed
 - Discuss the accident and contributory factors with those involved
 - Discuss the accident with any witnesses involved
 - Decide if disciplinary action is required
- The Director will then ensure, so far as reasonably practicable, that proper action is taken to help prevent the accident being repeated.

Actions to be taken in the event of accidents/ incidents

The following incidents must be reported to the HSE as indicated by the identified responsible person Mr S Grice Operations Director.

The HSE Incident Contact Centre (ICC) can be called for all reportable accidents on



0345 300 9923

The F2508 forms can be completed online.



What should be reported:

- A fatal accident to an employee or member of the public
- **Specified injuries to workers**

The list of 'specified injuries' in RIDDOR 2013 replaces the previous list of 'major injuries' in RIDDOR 1995. Specified injuries are (regulation 4):

- fractures, other than to fingers, thumbs and toes
- amputations
- any injury likely to lead to permanent loss of sight or reduction in sight
- any crush injury to the head or torso causing damage to the brain or internal organs
- serious burns (including scalding) which:
 - covers more than 10% of the body
 - causes significant damage to the eyes, respiratory system or other vital organs
- any scalping requiring hospital treatment
- any loss of consciousness caused by head injury or asphyxia
- any other injury arising from working in an enclosed space which:
 - leads to hypothermia or heat-induced illness
 - requires resuscitation or admittance to hospital for more than 24 hours

- If a member of staff is incapacitated for his/her normal work activities for over 7 days (not including the day of the accident but including any days not normally worked i.e. Saturday & Sunday, Bank Holidays etc. The accident must be reported within 15 days.
- If a member of staff is incapacitated for his/her normal work activities for over 3 days (not including the day of the accident but including rest days not normally worked i.e. Saturday & Sunday, Bank Holidays etc. The accident must be recorded but not reported.
- Occupational diseases
Employers and self-employed people must report diagnoses of certain occupational diseases, where these are likely to have been caused or made worse by their work: These diseases include (regulations 8 and 9):
 - carpal tunnel syndrome;
 - severe cramp of the hand or forearm;
 - occupational dermatitis;
 - hand-arm vibration syndrome;
 - occupational asthma;
 - tendonitis or tenosynovitis of the hand or forearm;
 - any occupational cancer;
 - any disease attributed to an occupational exposure to a biological agent.



Dangerous Occurrence

- (1) The collapse of or overturning of or the failure of any load-bearing part of any:-
 - (a) lift or hoist
 - (b) vehicle
- (2) The failure of a pressure system which has the potential to cause death to a person.
- (3) Any accident or incident which resulted or could have resulted in the release or escape of a biological agent likely to cause severe human infection or illness.

Where an accident is required to be reported to the enforcing authorities it will be reported by Mr S Grice.

All reportable accidents will be kept for 5 years as required by RIDDOR.

When Accident Books are complete new books will be provided and the old books will be kept for at least 5 years.



**INCIDENT/HAZARD
REPORT FORM
HEALTH AND SAFETY AT WORK**

INCIDENT/HAZARD REPORT

This form is to be used to report:

- a) A specific accidental occurrence which could have caused injury to a person or damaged equipment.
- b) To report a hazard of an on going type which is detrimental to health or likely to cause an injury or damage.

Person making report:

.....

Date:

Person(s) at risk:

.....

Witness:

Supervision notified:

.....

Description of incident/hazard:

.....

.....

.....

.....

Action taken or recommended:

.....

.....

.....

.....

Received by (Name):-

Date: Signature:



ACCIDENT / DANGEROUS OCCURRENCE REPORT.

Ref. No..... Date:

Date of accident/dangerous occurrence: Time:.....

Name of injured person:

Age: Occupation:

Address:..... Clock No:

.....

Department:

Name of Witness:

Address:

Reported to:

Place where accident/dangerous occurrence happened:.....

.....

Name of injury..... (Left/Right) :.....

Fracture (Yes/No) Detained in hospital for 24 hours (Yes/No)

Time stopped work more than three days absences (Yes/No)

What was the injured person doing:

.....

Cause of accident:

.....

In case of major injury or dangerous occurrences notify HSE as soon as possible and report on F2508 within ten days. (HSE phone **0845 300 9923**)

Signature: Date:

Please use the reverse of this form for any sketches, dimensions, etc. which may be useful subsequently. Alternatively affix photograph of scene of accident.



HEALTH & SAFETY

POLICIES AND PROCEDURES

HS3

Policy on First Aid

The First Aid provisions are assessed for Startright site taking account of the level of risk of injury, infection etc. and the number of employees on site. The Directors have identified that the activities carried out and the amount of close supervision undertaken reduces the risk of serious injury to low levels. Further hospital facilities are available within 3 miles of the organisation. However, the Directors believe that it is good practice to ensure trained first aiders are available on site and both have undertaken appropriate recognised training.

Only people who have attended an approved course on First Aid are permitted to be called First Aiders and administer First Aid. The Directors will be responsible for ensuring the First Aid Box has sufficient quantities of suitable equipment and is restocked when required.

Where identified through risk assessment there is a need for supplementary training on specific risk activities or to cover for people with special needs that training will be provided.

Supervisors are responsible for organising the training of First Aiders.

Where Startright site does not have a trained First Aider (due to holidays, sickness etc) an appointed person will be identified to ensure First Aid Provisions are suitable and sufficient and is responsible for summoning help from medical professionals when required. An appointed person must not administer First Aid.

Only items on the prescribed list must be put into the First Aid Box. Under no circumstances should any medicines, ointments, creams etc. be put in or administered whilst at work.

A list of the trained first aiders is displayed upon the health and safety notice board.

After first aid is administered an incident report form and the accident book must be completed. And where the accident is likely to be reportable (See HS2 Accident Reporting) the appropriate member of management must be informed without delay.

The First Aid Box is a Green Box with a white plus or cross sign on it.



The location of the First Aid Box(es) will be displayed on site.

Where risk assessments identify specific needs for additional equipment, that equipment can be stored in or near to the First Aid box.

It is the policy of Startright Limited that disposable gloves are always worn to treat any casualty where there is blood or bodily fluids present or if they are aware of a specific risk.



HEALTH & SAFETY

POLICIES AND PROCEDURES

HS4

POLICY ON MANUAL HANDLING

More than 34% of all workplace accidents are attributed to manual handling activities. Not only manual workers contribute to these statistics, those in sedentary occupations such as office workers, and other employees and visitors, are also at risk. Manual handling accidents have been estimated to have cost industry some £90 million per year.

Startright recognises that Manual Handling operations are a significant part of the workload for our employees and recognise our duties and obligations and fulfil these duties and obligations by:-

1. Assessing all work activities with a view to eliminating or minimising the need to manually handle goods.
2. Startright Limited where it recognises Manual Handling cannot be avoided, provide lifting and carrying aids to minimise the risk of injury.
3. Where lifting and carrying aids are provided, employees must use them, They will receive training on the correct and safe use of handling equipment and correct methods of manual handling

Employees are reminded of their duty to report unsafe situations and where an employee is of the opinion they are at risk of injury due to manual handling they must ask for assistance or contact their Supervisor for further help.

Employees must follow The procedures covered within their Manual Handling training and the guidelines over the page within this policy.

Detailed below are some of the injuries caused by poor manual handling techniques. The correct way to manually handle loads are set out later in this section.

Assessment Prior to Handling

Before undertaking handling / lifting any load manually, an assessment of the load is essential and several factors should be considered. However, the golden rule on lifting is "IF THE LOAD IS TOO HEAVY FOR YOU - **GET HELP**".



The points to be considered prior to lifting are:-

a) Physical Weight

Employees should be aware of the actual weight of the object to be lifted. Where regular lifting of specific items takes place this is generally not a problem. However, when unusual objects have to be lifted employees should have a method of estimating the weight involved.

b) Size

The overall size of any object, whether it is heavy or light, has considerable importance. Just like any lifting machine, the centre of gravity should be as near to the machine as possible. The wider the arms are located and the further the hands are in front of the body, the greater the tension on the shoulders, chest and back muscles. Often the use of straps, hooks and other handling aids will assist when moving large loads. A distinction must be drawn between handling indoors and outside where the wind could dramatically affect individual ability, especially when handling sheet materials. Finally, large loads can affect the field of vision.

c) Shape

The shape of a load should be closely linked to its size. Again, carrying a load at the point of balance is essential. Often, however, it is difficult to immediately find the point of balance. Many loads are off balance, and in the case of a moving in a container, e.g. liquids, loose items, etc., the point of balance will constantly be changing.

d) Rigidity

If a load is likely to change shape when being handled this will create difficulty with the grip or hold. Many of today's materials are packed in bags or sacks and the problem of the load shifting may pull a person off balance.

e) Outside Surfaces

The material in which a load is packed could ease the problems of handling. If a person can get a good grip the problem becomes easier. The use of gloves can serve two purposes in firstly, providing a good grip, and secondly, when handling items with sharp edges can prevent lacerations.

f) Height

The position of the load can provide safer lifting. The hands can perform the task most efficiently when they are placed directly in front of the body, between the shoulders, close to the body and in an area between chest and thigh level. Difficulties increase once a person attempts to lift outside this area. Wherever possible handling loads below the feet or above the head should be avoided.



Handling loads above head level has the added disadvantage of the handler not being able to see the top of the load and thereby risking other items falling onto the head. It is also essential to know the weight of the load when, say, taking it down from a shelf, so that a person is not taken by surprise when initially receiving the load. In this situation the use of steps or staging is an advantage.

g) Ground and Floor Conditions

The surface on which loads may have to be carried will obviously affect safety. Uneven, slippery or loose surfaces should be avoided. Also, suitable footwear should be worn not only to prevent injury if the load is dropped but also to prevent slipping.

h) Headroom

Consideration should be given to the amount of headroom available because once a person has to lower their head there is a tendency to adopt a 'top heavy bending action'. A top heavy bending action may be described as keeping the legs straight and inclining the trunk forwards.

Correct Handling Techniques

The following procedure should be used when lifting:-

a) Position of Feet

The feet should be positioned hip width apart to provide a firm base. One foot should be placed forward and to the side of the object to give better balance.

b) Knees

Bend the knees and crouch to the load. The weight should be gripped with the roots of the fingers and the palms of the hands. This keeps the load under control. Use of the finger tips should be avoided as this will cause loss of grip.

c) Arms

The arms should be kept as close to the body as possible when carrying loads which reduces fatigue in the arms and shoulders.

d) Leg Muscles

Successful lifting should utilise the very strong muscles in the thighs. When lifting straighten from the legs lifting in one smooth and progressive movement from floor to carrying position.

THE FOLLOWING IS THE PROCEDURE FOR SAFE MANUAL HANDLING. ALL STAFF AND VISITORS MUST FOLLOW IT AT ALL TIMES. FAILURE TO FOLLOW CAN CAUSE SERIOUS INJURY AND/ OR DISCIPLINARY ACTION.



1. The initial movement begins with relaxing the knees allowing the feet to adjust, forming a base into which the body lowers in a balanced fashion.
2. One foot is slightly behind the box and one to its side, both feet pointing forwards.
3. The rest of the body begins to lower in a base fashion; ankle and knee flexing are followed by flexing of the thigh and back.
4. Finally the head is allowed to drop, allowing the shoulders to sag and thus the hands and arms to lower, the leading hand can now tilt the box.
5. The leading hand is placed on top of the box on the front edge and pushes it forward. The trailing hand is placed under the box and grips it with the 'palmer' grip. The hand on the top of the box can now be re-positioned to grip it at the side.
6. The upward movement begins with lifting the head and breathing in to inflate the diaphragm and therefore, support the lumbar region of the spine.
7. The action of the thighs pushes the body upwards. The arms draw the box close to the centre of gravity of the body and keeps a firm hold on it, with the elbows close to the body.
8. Thrust from the rear foot begins the follow through as the subject moves away. There should be no loss of stability of the box or the person during the movement.

Other Points on Lifting

- a) Use hand, arm or foot protection where necessary.
- b) Make sure a clear route is available for carrying the load.
- c) If more than one person is involved in the lifting operation ensure that only one person is in charge giving clear instructions.
- d) Where mechanical aids are provided use them.
- e) Extra care is required when lifting awkward shapes.

FINALLY:-

IF THE LOAD IS BEYOND YOUR CAPACITY – GET HELP.



HEALTH & SAFETY POLICIES AND PROCEDURES HS5

HEALTH AND SAFETY CONSULTATION WITH EMPLOYEES

In line with the Health and Safety (Consultation with Employees) Regulations 1996 employees will be consulted where there is likely to be significant change to the risks they face due to, the change in the work process, the introduction of new materials or equipment and where consultation is necessary to ensure staff are aware of the measures to ensure their own safety.

Health and Safety Committee

Startright recognise the importance of consultation with employees on health and safety matters. However due to the number of employees and size of the company it is regarded as un-necessary to hold meetings as a formal committee.



HEALTH & SAFETY POLICIES AND PROCEDURES HS6

POLICY ON HEALTH AND SAFETY TRAINING

Startright recognises training to be an essential and important part of safety management and as such ensure all employees have received training in their trades and relevant health and safety training to allow them to be aware of risks and how to minimise risks.

When indicated through risk assessment or other means training, information and instruction is provided and recorded with follow up questionnaires on the suitability of the training etc.

TECHNICAL TRAINING

This will include external and in-house training schemes designed to broaden employee's awareness and experience in the technical aspects of their work, and to develop their abilities as their career progresses.

SPECIALIST SAFETY TRAINING

Covers any specific training requirements identified by management through specific risk assessments carried out prior to the commencement of each contract. This will include the use of specialist equipment or processes.,

All persons need training to enable them to carry out their responsibilities effectively. The company recognises the importance of training of:

1. Induction Training

Induction of persons into a new workplace is a vital activity as regards safety.

The objective of induction training is to enable the recipient to quickly and efficiently fit into a strange, and possible frightening new workplace. They may not understand the local language, but will be expected to quickly perform their tasks smoothly and without creating hazards for their colleagues, themselves or damaging the equipment.

Language problems may not be racial, or regional. A common problem is the terminology developed by, and peculiar to, a trade or workplace.

Induction training should be based on an analysis of who and what the trainee needs to know. A proper induction can help the new employee not only to be safe during his or her first few days within the job, but will assist in quickly identifying with the employer and his/her new workmates.



Induction training is important for a number of reasons:

- It establishes a safety culture;
- Shows management commitment;
- It is required by law (HASAWA and Management Regulations);
- Ensures specific health and safety issues are addressed immediately a person enters an organisation;
- Sets the scene for future performance.

The company also recognises the importance of the following training

2. Job Specific Training

e.g. Persons transferred from one job to another.

3. Health and Safety Training

Comprehensive records of training given should be kept.

Benefits

As a result of suitable systematic training:

- a) Hazard exposure and risk taking will be minimised, resulting in fewer accidents. A trained employee will be aware of the job requirements and how to apply the necessary safe systems of work.
- b) Legal obligations will be met for both general and specific training needs, e.g. abrasive wheels, power presses, fork lift truck operators, etc...
- c) The workforce will be more productive, with higher and more consistent quality standards.
- d) Employee morale and teamwork will improve, increasing job satisfaction.
- e) Managers will have more time for constructive activities. Less time will be spent correcting deficiencies, investigating accidents, and generally supervising the individual's job performance.
- f) A systematic training programme will result in a more flexible workforce.
- g) If it is not already evident, it should be noted; in meeting the aims of workplace safety the employer will achieve benefits in all areas of workplace activity.

The company recognises the importance of induction training and is aware of the vulnerability of new starters and as such provides the following induction course for all new starters



Startright

Induction Training Plan

Introduction

Main Theme

Company background – what service it provides – customer base, etc.

Facilities

Welfare facilities, toilets, changing areas, etc.

First Aid

Where to locate first aider, importance of first aid.

Accidents

Accident recording and reporting procedure.

Machinery / Equipment

Must be trained to operate safety procedures and prohibitions.

Hazardous Materials

Importance of labels – how to handle – how to store, etc.

Heavy Objects

Correct methods – get help if too heavy.

Protective Clothing

How and where to obtain it – how to use it.

Signs and Notices

The meaning and reasons for signs and notices.

Fire Precautions

Fire alarm – how signal is given – means of escape – assembly points.



Question Period

Ask individual for any questions of points for further discussion.

Summary

- Facilities are – rest area, toilets, washing facilities, etc...
- Accidents and injuries must be reported – first aiders are located wherever.
- You have to be trained before operating any machinery/equipment.
- Read all labels on hazardous materials, if in doubt ask.
- Any object that are too heavy for you – ask for help.
- You can obtain personal protective clothing from stores.
- Obey all signs.
- Locate five exits and assembly points in your are

Young Persons Training

Definition

A young person is defined as a person of either sex who has reached school leaving age but has not yet reached the age of 18.



Because of their youth and inexperience all young persons will require closer supervision than adult employees.

The main statutory responsibility for employers is to ensure, so far as is reasonably practicable, that young persons are not exposed to risks to their health and safety. The company will:

1. Ensure that young persons are adequately supervised during their period of training and also after completion of training supervision monitors their attitude to safety.
2. Give necessary information, training and instructions on health and safety and decide on the best method of doing so.
3. The company's safety policy is brought to the attention of the young person and relevant sections emphasised.
4. Supervision must always be ready to give young persons advice backed up by written guidance where necessary and be tolerant if asked a constant stream of questions.
5. Young persons should never be left along with dangerous equipment or left in dangerous situations whilst undergoing training. This may extend into supervision of lunch breaks.

It should be borne in mind that many young persons do not want to appear stupid when undergoing training or talking to people.

It is essential that questions are asked of the young person to ensure that they fully understand and comprehend the information that has been given to them.



HEALTH & SAFETY

POLICIES AND PROCEDURES

HS7

POLICY ON ELECTRICAL SAFETY

Electricity is essential for most businesses and is an essential part of the operation of Startright. Electricity when used properly is safe but when misused or if a fault occurs it can result in death or serious injury.

Startright use only fully qualified electricians to conduct electrical installations, alterations and repairs. The electricians also carry out portable appliance testing throughout Startright. All portable appliances are inspected and tested by a qualified electrician once every 12 months.

All employees who are using electrical equipment must visually check it before use each day to ensure there are no obvious defects likely to cause a risk to the user or others likely to come into contact with the equipment.

All employees must report any damage to plugs, cables or the appliance as soon as practicable to their Supervisor who must take the appropriate action.

Under no circumstances have employees or visitors to use any electrical equipment that is damaged or defective or use any electrical equipment that is not labelled as having passed its electrical test (usually found on the plug tops but can be on the appliance or the cable).

Employees or visitors are not permitted to carry out any electrical repairs or maintenance (unless they are a qualified electrician and have express permission from a member of senior management).

Employees or visitors must not under any circumstance bring electrical appliances in from home or purchase second hand electrical equipment for use at work.

Only electrical equipment that is new or that has been tested within the last 12 months by competent electricians can be used at work.

Failure for employees or visitors to follow this policy could lead to serious injury or death.



HEALTH & SAFETY

POLICIES AND PROCEDURES

HS8

Safety in the use of vehicles

Currently vehicles are not used. In the future the following would be used if required

Where Startright use vehicles including light commercial and are responsible for the movement of vehicles on site.

The use of Vehicles can be extremely dangerous and must be controlled as follows:

- (1) Only fully qualified Licensed people can drive Vehicles and must hold the required licences.
- (2) All Vehicle Drivers will from time to time be assessed for their competency and if they do not reach acceptable levels of competency they will receive additional training, information, instruction and supervision or may have their authorisation to drive the Vehicles withdrawn.
- (3) All Drivers will complete a daily check routine and record it on the check sheet where provided.
- (4) Vehicle drivers are responsible for the safety and security of their vehicle
The driver must remove the key from the vehicle and ensure no unauthorised people gain access to the keys
- (2) Vehicles must be parked in a safe place.
Its location must not create a trip hazard or restrict passageways.
- (3) When charging electrical vehicles the area should be clear from combustibles and should be free from sources of ignition. The area must be well ventilated and signed, i.e. no smoking or naked flames.
- (8) No Smoking in any company vehicle.

It will be the Vehicle Driver's responsibility to ensure the vehicle is maintained in a safe, clean condition.



Any faults found must be recorded on the operators daily check sheet (when provided by the hire company) and brought to the attention of their Supervisor who must take the appropriate action to deal with the problem or take alternative action.

Drivers may only drive vehicles they have been trained to drive and where additional training is required this must be carried out before the vehicle is driven.

Vehicles must only be used in the way they have been designed to be used and must not be used in any other way. No attachments are to be used unless they have been approved by the vehicle Manufacturer and have been assessed by Startright.

Misuse of vehicles can lead to death or serious injury. People misusing Vehicles may be liable to prosecution in Court.

When delivery drivers are reversing a vehicle it is essential that all staff and the public are kept clear from the rear of the vehicle.



HEALTH & SAFETY POLICIES AND PROCEDURES

HS9

POLICY ON THE SELECTION, USE AND STORAGE OF PERSONAL PROTECTIVE EQUIPMENT

Although Startright will strive to reduce risks by other means recognising that Personal Protective Equipment (PPE) is to be a last resort we recognise the inevitability of the need to issue and wear PPE.

PPE will be issued when it is identified it is necessary to minimise a risk of injury and/or ill health and after other control measures have been considered.

All PPE will be assessed in accordance with The Personal Protective Equipment at Work Regulations 1992 for its suitability for protecting against a risk and its compatibility with other PPE.

Before issuing PPE staff must ensure it is CE marked and to the appropriate BS/EN standard.

If in doubt check with the supplier.

Employees and visitors must wear PPE provided and must ensure it is stored and kept safely. Furthermore any defects to PPE must be brought to their Supervisor's attention who must ensure the appropriate action is taken.

Where Startright do not provide PPE but arrangements are made for employees and visitors to supply their own it is still a requirement for that PPE to be to a high standard i.e. shoes must have good grip and be suitable for task etc.

All employees and visitors will be instructed and where required will receive training on the use of PPE.

British Standards and CEN Standards or BS EN (European) Standard

Most PPE will be made to an appropriate British Standard. The British Standards Institute prepares standards for products and issues licences to manufacturers only after thorough inspection and testing of individual products.



Manufacturers awarded licences are required to display one or both of the following certification marks on all products for which the relevant licences have been issued:-

1. The Kitemark gives assurance that a product complies in all respects with the requirements of the relevant British Standard.
2. The Safety mark give assurance that a product complies with the safety aspects of a British Standard or a British Standard concerned with safety.

Now being phased out as it was only used for electrical equipment.

3. The CE mark denotes compliance with EU directive on PPE but it may not be verified or tested by any third party since the need for this depends on the type of equipment.

General Notes on PPE

The best type of PPE is that which is worn. Protective clothing is generally a compromise between comfort and protection and wearer acceptability is essential. There is no benefit in issuing top of the range equipment if it is unnecessary for the hazard. A better philosophy is to provide suitable protection for the general hazards and provide and enforce the use of the heavier duty equipment only when needed.

Consideration should be given to the problems that may be created for the worker whilst wearing PPE. Involving the workers in selection of the PPE should be encouraged.

If the workers play a part in selection they will be more likely to co-operate in using the clothing. Training and instruction in the correct use and need to wear PPE should be given.

Consideration also should be given to compatibility of equipment if a worker has to wear more than one type of PPE to ensure they do not interfere with each other

Head Protection

The only current specific legislation for the wearing of head protection is the Construction (Head Protection) Regulations 1989. However, the general requirement of the Health and Safety at Work Act 1974 Section 2 will apply and employers may decide to issue head protection as part of their safety procedures.

The British Standard for **safety helmets is BS EN 397**. The standard lays down tests for shock absorption and penetration of helmets.

The harness of the helmet apart from holding the helmet firmly on the head also absorbs kinetic energy during impact and it is essential that the helmet is properly fitted.



Helmets are made in a variety of materials, the most common being various forms of plastic, fibre glass and aluminium alloy.

Industrial scalp protections known as bump caps are increasingly being used in industry as protection against bruising and abrasion by personnel working in confined spaces. These are manufactured to BS 4033. These caps are only designed to protect against minor risks and are not to be used as protection against falling objects.

Snoods, hairnets, hats and caps made of various materials are available to prevent workers hair catching in moving machinery. Another use is for hygiene purposes in food and other sterile industries.

Eye Protection

The major dangers of injuries to eyes may be:- Solid particles, dust, chemical splash, irritant gases, fumes, molten metal, glare, infra red, ultra violet radiation and laser beams.

There are a number of British Standards that relate to eye protection.

Hearing Protection

Basically noise is described as unwanted sound and excessive exposure to noise can cause permanent hearing loss. The Noise at Work Regulations 1989 specify that between 85 dB(A) and 90 dB(A) hearing protection should be available and the wearing encouraged and above 90 dB(A) the wearing of hearing protection is compulsory.

There are many types of hearing protection available. These are:-

1. Individually **moulded ear plugs** or acrylic, silicone and synthetic rubber in a fluid paste which is inserted into the ear canal, hardens in situ forming a permanent individually moulded ear plug of the correct shape.
2. Disposable wax impregnated glass down, deformable foam, etc., which are shaped and inserted into the ear canal.
3. Permanent moulded pre-shaped plugs of rubber or plastic for insertion into the ear canal.
4. **Expandable foam plugs** which are rolled down prior to insertion and then expands in the ear to fill the ear canal.
5. Sonic valves – hollow pre-moulded plugs of rubber or plastic with a valve system to attenuate sounds, but allow speech or other low intensity sounds to pass.



6. **Ear muffs.** These are hard cups which fit over the ear and are sealed to the head with soft cushion seals. They have several advantages compared with ear plugs; one size will fit most people, more protection is usually provided, and they are easy to remove and replace, which is an advantage for people who frequently move from a noisy to a quiet place. It is possible to include ports or valves which can be manually opened during quiet periods, or an electronic device which permits passage of low intensity signals without attenuation. However, they tend to make the ears hot, and are bulky, so that they are rather inconvenient if slipped around the neck when not in active use.

All types of ear muffs are likely to be damaged, and it is an advantage if the individual parts, especially the seals, can be replaced separately and easily, either at the workplace or on the premises.

7. Other types of ear protector, such as amplitude-sensitive and frequency selective types.

The British Standards of hearing protection are:-

- * BS 6344 Industrial Hearing Protectors

- * BS 5108: 1983 Method for measuring sound attenuation of hearing protectors. See also BS EN 325-1 for ear muffs and BS EN 458: 1994 for selection, use, care and maintenance of hearing protection.

Protective Footwear

There is no specific legislation requiring the use and issue of safety footwear. However, under the HASAWA it may be necessary to issue footwear to meet the safety responsibilities under the Act. Furthermore the Management of Health and Safety at Work Regulations 1999 requires control measures to be implemented when risks are identified.

A number of organisations have made the wearing of safety footwear a condition of employment and in many cases subsidise the purchasing of the footwear.

Some of the potential injuries to feet and their solutions are:-

- Toe injuries from impact – steel toecaps
- Penetration injuries through the sole, by incorporating a steel midsole
- Slipping, heat, oil and metal swarf, by design of the sole and the tread pattern
- Electric shock – by non conducting soles
- Anti-static – by conducting soles
- Molten metal – foundry boots are designed to protect feet and legs from molten metal splash

Gloves should be worn as much as possible when handling materials and articles to protect the hands, not only from cuts, punctures, heat and chemical burns or electric shock but also from irritants and contaminants. The kind of gloves will depend on the hazards involved. It is important to remember that gloves should not be used at moving machinery, e.g. drilling machines.

A large proportion of the industrial gloves used in the UK are traditional types made either of leather or cotton, but many other kinds are currently in use. The most common one is the PVC fabric-supported glove, and there are a variety of types available, for example, for use against injurious chemicals; for foundry or comparable hot work a palm-coated type is manufactured; and there is a ribbed design for handling greasy objects.

Synthetic fabric, such as nylon, is used for specific light work and synthetic rubber, such as neoprene and nitrile which have the basic properties of rubber, display good resistance to fats, oils, greases, etc., and also (in the case of nitrile) resistance to solvents.



P.P.E. Regulations 1992

Personal Protective Equipment (PPE) Issue Record

Name of person responsible for issue:		
Type/description of PPE		
Head	Eyes	Ears
Hands/arms	Apron	Overalls
Feet	Other	
Site/location where PPE must be used		
Information, training and instruction relative to PPE		Issued
Correct usage		Date
Location/processes where PPE must be used		
Cleaning, storage, maintenance and testing procedures		
Replacement (including element replacement i.e., filter, etc.)		
Any other information/training/instruction (give details).		

Regulation 10 (2)

Every Employee shall use any personal protective equipment provided.

Reg. 10 (4) *Shall take all reasonable steps to return it to accommodations provided after use.*

Reg. 11 *Every employee who has been provided with (PPE) shall forthwith report any loss or defect.*

I certify that I have issued with the above mentioned PPE, and have received the necessary information, training and instruction.

Signed: Date:.....



HEALTH & SAFETY POLICIES AND PROCEDURES

HEALTH & SAFETY POLICIES AND PROCEDURES

HS10

POLICY ON THE SELECTION OF SAFETY SIGNS

Startright recognises its duties under the Safety Signs & Signals Regulations 1996 and will ensure all signs provided comply with the regulations.

Where a risk is identified and it is felt that safety signs are required, these will be purchased and displayed in appropriate places warning of the risks.

Where it is impossible to identify by means of signage or if signage is on order, all staff are to be made aware of the risks as are other contractors etc.

If safety signs are required, they should be purchased with the consent of their Supervisor when required.

Safety signs must be clearly understandable to all people and where required pictorial symbols will be displayed.

All employees and visitors must be made aware why signage is being put in place and must be aware of the need to comply with the instructions of the signs.

When visiting other premises staff must be aware of site specific signs and where they are unsure of the signage meaning they should seek clarification from the client or their Supervisor.

Startright recognises that safety signs are provided to bring information to the attention of those requiring the information but recognise that to be effective safety signs must be backed up by effective verbal communication, company policy and staff training.



HEALTH & SAFETY POLICIES AND PROCEDURES HS11

POLICY ON THE SAFE USE OF POWER/ HAND TOOLS

Hand tools are responsible for causing many injuries and therefore must be handled and treated with the utmost respect.

The use of hand tools such as hammers, saws, drills etc. are restricted for the use of the experienced tradespeople and will only be used by competent workers.

When using electric power tools 110v should be used. If this is not possible circuit breakers must be used (refer to HS6).

All tools must be thoroughly checked before they are used and they must be maintained in a safe working order...

Checks to the casing, cable and plug must show no defects.
The equipment must be tested to ensure all safety features are working properly and all guards are the correct type and suitably located on the equipment.

Any defects, the equipment **must not be used**. It will be clearly indicated as damaged and rendered unusable and the fault must be reported to Their Supervisor.

All employees using Power/Hand tools will receive training in the use of the equipment and will be fully aware of the risks in its use. Risk assessments will be carried out on the use of Power/Hand Tools and all employees and visitors must abide by the safe system of work stipulated.

ONLY STAFF WILL OPERATE POWER TOOLS



HEALTH & SAFETY

POLICIES AND PROCEDURES

HS12

POLICY ON DEALING WITH CONTRACTORS/OTHERS ON SITE

Startright recognises its duties and responsibilities to be co-operative and co-ordinate health & safety with others whilst working on the same site.

To ensure continuity of working standards and health and safety standards Startright uses only a handful of specialised contractors who have been approved and vetted as competent. These contractors are required to provide us with their company health and safety policy, relevant risk assessments, method statements and details of their competent person identified under regulation 7 of the Management of Health and Safety at Work Regulations 1999.

From time to time Startright will use other specialist contractor for one off work and on these occasions the same procedure will be followed.

If any problems occur, these must be brought to the attention of Mr S Grice who will take the appropriate action.

The person in charge of the project must ensure the contractor complies with Health & Safety rules and must take appropriate action when employees and others are put in danger.

Contractors must not be allowed on the premises if under the influence of alcohol or other drugs likely to affect their judgement for safety.

Contractors must obey the smoking policy on the premises they are working on and must not work in a manor that is likely to put themselves or others at risk.

When visited by an official from Environmental Health, Health & Safety Executive, Fire service or police, Mr S Grice must be contacted when is available.

Anyone entering premises for the purposes of carrying out specialised work for the company are a 'contractor' to whom duties are owed, and indeed who owes duties with regard to health and safety matter. Because of this, the same control measures must be applied to all who work on premises. Window cleaners, agency staff, equipment repairers and services providers etc

Analysis of investigations into accidents shows that financial pressures, whether real or perceived, are nearly always present. The making and acceptance of the low bid in



competitive tendering is often at the expense of health and safety standards. Other major factors include a transient labour force which never gets properly or fully trained, the small size of most contracting companies which claim not to be aware of legislation or safe practices, the inherent danger of the work and work conditions, pressure of work, and poor management awareness of the need for safety arrangements. All the above have been shown to contribute to poor safety standards.

Strategy for the Control of Contractors

There are six parts to a successful control strategy. The extent to which each part is relevant will depend upon the degree of risk and the nature of the work to be contracted. The parts are:

- ❑ Identification of suitable bidders
- ❑ Identification of hazards within the specification
- ❑ Checking health and safety aspects of bids and selection of contractors
- ❑ Contractor agrees to be subject to client's rules
- ❑ Control of the contractor on site
- ❑ Checking after completion of contract

Identification of Suitable Contractors

It is clearly necessary to work out a system aimed at ensuring that a contractor with knowledge of safety standards and a record of putting them into practice is selected for the work.

1. Each contractor wishing to enter onto the companies 'approved list' should be asked to provide his safety policy, risk assessments etc. Arrangements will be required for vetting these for adequacy.
2. A pre-qualification questionnaire should be completed by each contractor, providing necessary information about his policy on health and safety, including details of responsibility, experience, safe systems of work and training standards.
3. At this stage, it should be possible to identify contractors for approval, but feedback will be required to identify any who do not in practice conform to their own stated standards. This means that the list will require regular scrutiny and updating.

Specification



The following checklist will be followed which will give a pointer to most if not all of the common health and safety problems which may arise during the work. These should be communicated to the contractor in the specification before the bid is made. The received bid compared with the checklist to ensure that proper provision is being made for the control of risks identified.

Checklist

1. Special hazards and applicable national or local regulations and codes of practice (asbestos, noise, permits to work).
2. Training required for the contractor's employees.
3. Safe access/egress to and from, the company and to places of work within the company.
4. Electrical and lighting requirements.
5. Manual/mechanical lifting.
6. Buried and overhead services.
7. Fire protection.
8. Occupational health risks, including noise.
9. Entry into confined spaces.
10. First air/emergency rescue.
11. Welfare amenities.
12. Safe storage of chemicals and flammable substances.
13. Personal protective equipment.
14. Documentation and notification.
15. Insurance and special terms and conditions of the contract.

Checking the Bid



When the bids are returned. It should be possible to distinguish the potentially competent. An 'approved list' of contractors, scrutinised at intervals, can save the need for carrying out a complete re-selection process.

Safety Rules

A basic principle of control is that as much as possible should be set down in detail in the contract. An important condition is that the contractor agrees to abide by all the provisions of the company safety policy.

Often, the contractor may delegate the performance of all or part of the contract to other sub-contractors. In these cases it is essential to ensure that the sub-contractors are as aware as the original contractor of the site rules and safety policy. A condition which can be attached to the contract is that the contractor undertakes to inform any sub-contractors of all safety requirements, to incorporate observance of them as a requirement of any future sub-contract, and to require the sub-contractor to do likewise if he in turn sub-contracts any work.

Written orders containing detailed terms and conditions such as the above should be the basis of the contract and should be acknowledged by the contractor before work starts. The loan of tools and equipment by the client should be avoided unless part of the original contractual arrangement.

Areas of concern which will be covered by general site rules and within the company safety policy will be communicated to the contractor.

They include:

- Materials storage, handling, disposal
- Use of equipment which could cause fires
- Noise and vibration
- Scaffold and ladders, access
- Cartridge-powered fixing tools
- Welding equipment – and use of client's electricity supply
- Lifting equipment – Certificated, adequate
- Competency of all plant operators
- Vehicles on site – speed, condition, parking restrictions
- Use of lasers – ionising radiation
- Power tools – voltage requirements
- Machinery brought on site
- Site huts – location, ventilation, gas appliances
- Use of site main services
- Electricity – specialised equipment required
- Fire fighting rules
- Waste disposal procedures
- Use of client's equipment
- Permit to work systems in force



- ❑ Hazardous substances in use on site by client
- ❑ Basic site arrangements, times, reporting, first-aid, fire
- ❑ Site boundaries and restricted areas

Control of Contractors on Site

The following measures are essential for all contractor operations, however large or small the contract.

Appointment/nomination of a person or team to co-ordinate all aspects of the contract, including health and safety matters.

A pre-contract commencement meeting held with the contractor and sub-contractors as necessary, to review all safety aspects of the work. The contractor should also be asked to appoint a liaison person to ease later communication problems which may arise. Also, communication paths should be developed to pass on all relevant safety information to those doing the work. Any permitted borrowing of equipment should be formally discussed at this time.

1. Arrangement of regular progress meetings between all parties, where health and safety is the first agenda item.
2. Regular (at least weekly) inspections of the contractor's operations by the client.
3. Participation in safety committees on site by contractors will be a condition of the contract.
4. Provision by the contractor of written method statements in advance of undertaking particular work, as agreed. Work which this would apply to includes demolition, asbestos operations, work which involves disruption or alteration to main services or other facilities which cause interruption to the client's activities, erection of false work or temporary support structures, and steel erection. An essential feature, but one often missing, is the stipulation that, in the event of the need for a deviation from the method statement, no further work will be done until agreement has been reached and recorded in writing between the client and the contractor on the method of work to be followed in the new circumstances.
5. The formal reporting to the company by the contractor of all lost-time accidents and dangerous occurrences, including those to sub-contractors.
6. It is essential the company sets a good example by following all site rules.
7. Provide adequate safety literature, including posters and handbooks.
8. No machinery allowed on site until documentation on statutory inspections has been seen, including details of driver training and experience.



9. Monitor the contractor's safety training programme.

Contract Completion

The contractor should leave the work-site clean and tidy, removing all waste, materials, tools and equipment. This should be checked.

UK Legal Requirements

Failure to manage contractors has wide implications under the Health and Safety at Work etc. Act 1974, where Sections 2,3 and 4 can be applied to occupiers and contractors, depending upon the circumstances. Similarly, civil claims and damages can be made against the company as well as contractors.

Further the Management of Health and Safety at Work Regulations 1999; the Construction (Design and Management) Regulations 1994 (as amended) and the Construction (Health, Safety and Welfare) Regulations 1996 all require co-ordination and co-operation between contractors who share sites.



HEALTH & SAFETY

POLICIES AND PROCEDURES

HS13

POLICY ON DEALING WITH HAZARDOUS CHEMICALS

Startright recognises its duties and obligations under the Control of Substances Hazardous to Health regulations 2002 (as amended) and will strive to always:-

1. Select and use the safest products available so far as is practicable to protect our employees and others.
2. Ensure products are assessed on their use, handling, storage and disposal to ensure the safety of our employees and others.
3. Will issue information, instruction, training and supervision as required on the safe use etc. of the substances.

To this end Startright will

- Design and operate processes and activities to minimise emission, release and spread of substances hazardous to health
- Take into account all relevant routes of exposure-inhalation, skin absorption, and ingestion when developing control measures
- Use control measures proportionate to health risks
- Choose the most effective and reliable control options which minimise the escape and spread of substances hazardous to health
- Where exposure cannot be achieved by other means provide suitable PPE in conjunction with other control measures
- Check and review control measures in terms of their effectiveness
- Inform and train all employees on the risks and hazards from substances with which they work together with the control measures in place
- Ensure control measures do not increase the overall risk to health and safety

All products used by our employees and visitors are assessed to ensure employees and visitors are aware of the risks and the safe system of work in the use of the product. The prescribed C.O.S.H.H assessment form will be completed by the approved assessor and the product safety data sheet attached to the back of the assessment. All employees and visitors using the substances must read and be aware of the safe use of the products. If an employee is in any doubt they must ask their Supervisor.

In practical terms substances are purchased from various suppliers due to the specific needs of Company site.



Before products are used they will be assessed and the assessment will be kept on site available for inspection by all employees and visitors.

No employee or other relevant party is expected to use chemicals they have not received information instruction or training on.

Employees and visitors are strictly not allowed to mix chemicals (except where the manufactures instructions state it is safe, such action is very dangerous and could cause serious injuries.

Where products need to be diluted it must be diluted to the exact amount as stated in the risk assessments.

There is no need for employees and visitors to use chemicals unsafely - if in doubt ask. If any employees or other relevant party require technical information, they should contact the supplier of the product who will advise.

Listed below are the forms of health hazards which can affect staff and visitors at the company.

Physical:	Noise/Vibration Radiation Climate, i.e. temperature, humidity, air movement, ventilation/extraction
Biological:	Micro-predators, i.e. insects, mists, mould, spores, bacteria, etc. Drugs, enzymes
Ergonomic:	Lighting Posture Monotony Fatigue

The occupational health problem is at least the same magnitude as the occupational accident with approximately 900 deaths attributed to industrial diseases and about 300,000,000 man-days lost yearly due to sickness and ill health from all sources UK national statistics).

A large majority of these illnesses are caused by:

- Dust, fumes, mists, gases, vapours
- Toxic materials
- Corrosives

Monitoring

In order to ascertain what the problems are, it is vital to develop a monitoring programme/system. This is essential because:-

All environments are subject to change, people make mistakes. All hazards and stress causing factors cannot be planned out of an environment. Standards change. Each monitoring system will have the following key points:-

1. **Recognition** of the hazards (situations and materials which can have an adverse effect on the employees) which may exist due to chemical, physical, biological and ergonomic aspects of the workplace.
2. **Measurement** of the environment by direct reading instruments or sampling followed by analysis.
3. **Evaluation** of measurements using standards, i.e. information on the effects of materials, employee exposure, employee health training, performance, legislation and codes of practice.
4. Instigate **Control** measures to limit employee exposure. To meet the requirements of HASAWA, these control measures must firstly, adequately control the hazard, and secondly be suitable for the user.
5. Instigate **Training** and communication programmes to obtain user assistance in limiting their exposure to hazardous substances and conditions, and to assist in the maintenance of the control programme. This will include gaining social and economic acceptance from operators and obtaining economic and priority acceptance from management.
6. **Re-measurement** and re-evaluation to check for effectiveness of the control measures and to assist in the fine tuning of these controls.

Measurement

There are now a considerable amount of simple and easy to use sampling and direct reading equipment on the market. Your company and work situation will determine the equipment chosen, and the distribution, duration, frequency and number of samples taken to:

1. Identify the suspected problem
2. Give warning of the exercise of dangerous conditions

The Skin

The human skin is relatively thin, soft and flexible. One of the main functions of the skin is to serve as a barrier between man and his environment. It protects the internal organs and



tissues from injury and infection and also prevents them from drying out. The skin also helps to regulate body temperature and blood pressure and some of the excess water and salts via sweat glands. In addition, the skin is an important sensory organ.

Toxicology

Toxicology is defined as 'the study of how different materials affect the human body'.

Toxicity

Toxicity is defined as 'the potential of a substance to cause harm to living things'.

In the Control of Substances Hazardous to Health Regulations 1999 (COSHH) the terms Hazard and Risk are given definite meanings. These are:-

Hazard

The HAZARD presented by a substance is its potential to cause you harm.

Risk

The RISK from a substance is the likelihood that it will harm you in the actual circumstances of use, coupled with the degree of harm.

Before any substance can exert a toxic effect it must enter the body. The vital factor therefore, is the DOSE which is defined as '**how much of a substance you are exposed to and how long the exposure to the substance lasts**'.

This produces the RESPONSE which is **how the body reacts to the exposure**.

This can be represented as a graph showing a Dose/Response Curve.

Effects of Exposure

The effects of exposure can be divided into the following two areas:-

- a) Acute Effects
- b) Chronic Effects

a) Acute Effects

These result from a brief but high exposure to the substance and normally appear very shortly after the exposure takes place.

The results may be:-

1. Headaches
2. Dizziness
3. Nausea
4. Inflammation
5. Eye Irritation
6. Unconsciousness

7. Death

Some effect may be temporary with no permanent damage although exposure to some chemicals may lead to permanent damage.

b) Chronic Effects

These result from prolonged or repeated exposure to low concentrations. Effects may not be evident for many years. Some possible chronic effects are Cancer and Cirrhosis of the liver.

Hazardous Substances

Hazardous substances are classified into the following headings under '**The Chemical (Hazard, Information and Packaging) Regulations 1999**' (CHIP Regulations).

The important differences between classes of substances are '**the nature of the hazard and the dose/response relationship**'.

e.g. a strong acid would be corrosive
a weak acid would be an irritant

Toxic

A substance which, if a small quantity gained entry to the body, may involve serious acute or chronic health risks and even death.

Examples:- Mercury, Nicotine, Phosgene, Benzene

Harmful

A substance which, if a small quantity gained entry to the body, may involve Limited health risks

Examples:- Iodine, Toluene, Trichloroethane

Corrosive

A substance which on contact will destroy living tissue.

Examples:- Caustic Soda, Nitric Acid, Formic Acid

Irritant



A non-corrosive substance which through immediate, prolonged or repeated contact with the skin or mucous membrane can cause inflammation.

Examples:- Sodium Carbonate, Acetaldehyde

Toxic substances are also classified under the following headings:

a) Carcinogens

Defined as '**any cancer producing substances or agent which can cause growth of abnormal tissue or tumours**'.

Examples are **Coal Tar** which can cause skin cancer and **Vinly Chloride** which can cause liver cancer.

Carcinogen packaging must carry the risk phrase 'may cause cancer'.

b) Mutagens

Substances which may cause changes in human cells and may be handed down from generation to generation.

c) Teratogens

Substances which may adversely affect an unborn child. An example of this is Thalidomide.

d) Reproductive Poisons

Substances which affect Male and Female reproductive systems any may impair the ability to have children.

e) Target Organ Poisons

Substances which can cause damage to specific organs. An example is Carbon Tetrochloride which can cause liver damage.

f) Neurotoxins

Substances which can affect the nervous system of the body and slow the ability to control various parts of the body. Examples are Lead and Mercury.

g) Sensitisers

May cause allergic reaction after repeated exposure.

h) Narcotics

Substances such as alcohol, solvents, which may cause impaired judgement, dizziness, etc...

Physical Properties of Hazardous Substances

Hazardous substances take many forms the most common being the following:

Dusts

These are **solid airborne particles**, often created by operations such as grinding, crushing, milling, sanding and demolition. Two of the principle harmful dusts encountered in industry are asbestos and silica.

Fumes

Fumes are **solid particles which usually form an oxide in contact with air**. They are created by industrial processes which involve the heating and melting of metals, such as welding and smelting. A common fume danger is lead poisoning associated with the inhalation of lead fume.

Smoke

Smoke is the **product of incomplete combustion**, mainly of organic materials, and may include fine particles of carbon in the form of ash, soot and grit that are visibly suspended in air.

Mists

A mist is a **finely dispersed liquid suspended in air**. Mists are mainly created by spraying, foaming, pickling and electro-plating. Dangers arise most frequently from acid mists produced in industrial treatment processes.

Gases

These are **formless fluids** usually produced by chemical processes involving combustion or by the interaction of chemical substances. A gas will normally seek to fill the space completely into which it is liberated. One of the classic hazardous gases encountered in industry is carbon monoxide. Certain gases such as acetylene, hydrogen and methane are particularly flammable.

Vapours

A vapour is the **gaseous form of a material normally encountered in a solid or liquid** state at normal room temperature and pressure. Typical examples are solvents, such as trichlorethylene, which release vapours when the container is opened. Other liquids produce a vapour on heating, the amount of vapour being directly related to the boiling point of that particular liquid. A vapour contains very minute droplets of the liquid. However, in the case of a fog, the liquid droplets are much larger.

Solids

Certain substances in solid form can cause injury. Classic examples are cullet (broken glass), silica, asbestos and lead.

Liquids

Numerous dangerous substances are produced in liquid form including caustic and acid-based detergents, solvents and fuels.

Routes of Entry

Chemicals enter into the body in 4 ways. These are:

1. Skin contact (absorption)
2. Direct entry (injection)
3. Swallowing (ingestion)
4. Breathing (inhalation)

1. Skin Contact

There are two types of reaction to chemical contact with the skin.

a) Local Damage

This occurs at the place on the skin where the chemical lands. The effects of the chemicals can vary in the speed and severity of their actions. Some produce an effect within moments such as nitric or sulphuric acid whilst other such as acetone and methanol may take several days before an effect occurs.



The main hazard in this area is from corrosive substances such as acids and alkalis and the eyes are extremely sensitive to damage from corrosive substances and must be well protected when using these substances.

A major problem created by contact with the skin of hazardous materials is that of NON INFECTIVE DERMATITIS.

The two types of dermatitis are:

1. **Contact Dermatitis** attacks the surface of the skin. Produces skin redness, roughness, blisters. Heals when contact ceases. It will not stop until exposure to the causative agent ceases. Subsequent small exposures may be tolerated without further trouble. A return to work with possible exposure to the chemical can be allowed provided caution is exercised. After a number of recurrences, arrangements which prevent all further contact with the substances in question should be considered.
2. **Sensitisation Dermatitis** follows an activation of the skin's natural immunological processes, often after a symptom free period while the body's defences are being primed. Once this threshold is reached, dermatitis will occur if contact continues. Healing is often prolonged and only occurs when the sufferer is completely removed from further contact. The body's immune system is slowly activated to the chemical. Dermatitis is then produced by the slightest exposure. May also affect sites distant from the point of contact. Once sensitisation dermatitis has been diagnosed, no further exposure should be permitted.
3. Dermatitis can be prevented by:
 - ❑ Clean working conditions and properly planned work systems
 - ❑ Careful attention to skin hygiene principles
 - ❑ Prompt attention to cuts, abrasions and spillage's onto the skin
 - ❑ Use of protective equipment
 - ❑ Barrier cream can help, as will after work creams

b) Skin Absorption (Percutaneous)

Certain substances can be absorbed through the skin and it is essential that protective measures such as gloves are used, examples of these are:

1. Phenol

Rapidly absorbed through the skin giving skin burns. Phenol attacks the central nervous system causing headache, rapid breathing, and may lead to collapsing and even death.

2. Glycol Ethers

These can cause damage to the reproductive systems and may also cause kidney damage.

2. Direct Entry (Injection)

Hazardous substances may enter directly into the body through cuts, wounds, etc... Good hygiene practices are essential to protect against direct entry.

3. Swallowing (Ingestion)

This is a rare occurrence in industrial situations and it tends to occur when there is a failure of basic Health and Safety Standards.

Many substances that are ingested may be de-toxified by the digestive system although particular care must be taken with products such as Lead, Mercury, Antifreeze, etc...

4. Breathing (Inhalation)

Inhalation is the most important and likely route because of the surface area of the lungs and the large volume of air which is inhaled each day.

Obviously all gases and vapours can be inhaled and it is convenient to classify them under the following headings.

a) Physical Asphyxiates

Gases such as Nitrogen, Methane and Carbon Dioxide cause ANOXIA (lack of oxygen by physically reducing the amount of oxygen entering the lungs).

b) Chemical Asphyxiates

Chemical asphyxiates such as carbon monoxide, cyanide and hydrogen cyanide act by interfering with the body mechanisms for providing oxygen to the tissues.

c) Upper Respiratory Irritants

These materials irritate the nose, throat and trachea; in addition they irritate the eyes. Examples of these compounds are ammonia, sulphur dioxide and formaldehyde.



d) Pulmonary Irritants

The site of action extends throughout the respiratory tract and the result of exposure may be pulmonary oedema. Agents within this category are chlorine, bromine, toluene diisocyanate, ozone and phosgene.

e) Toxic Gases and Vapours

Following inhalation, these are absorbed into the blood and carried to other tissues or organs. They can sometimes be absorbed through intact skin. Two examples are carbon disulphide and hydrogen sulphide. Hydrogen sulphide has a characteristic odour of rotten eggs in low concentrations (0.1-1ppm). As the concentration increases to around 20-30ppm, the odour tends to disappear owing to fatigue of the sense of smell. Exposure above 600ppm leads to respiratory failure through the blocking of the respiratory centre.

Inhalation of carbon disulphide, a solvent used in the production of man-made fibres, can result in blurred vision, nausea, psychotic behaviour and paralysis of respiration through its effects upon the central nervous system.

Another major health problem is caused by the inhalation of dust, e.g. coal dust which builds up on the lungs leading to the lung disease called PNEUMOCONIOSIS.

Other problems concern the inhalation of fibres such as asbestos fibres which can lead to diseases such as ASBESTOSIS and MESOTHELIOMA

Occupational Exposure Limits

The Health and Safety Executive publish levels for substances which the majority of the population could be repeatedly exposed without any adverse effects. They are expressed in terms of concentration, i.e. the quantity of a substance per unit volume. These are usually given **in the HSE publication EH40** which is updated every year. The standards are:

Occupational Exposure Standard (OES)

The OES is the concentration of an airborne substance averaged over a reference period at which, according to current knowledge there is no evidence that it is likely to be injurious to employees if they are exposed by inhalation day after day to that concentration. For a substance which has been assigned an OES exposure by inhalation should be reduced to that standard. However, if exposure by inhalation exceeds the OES then control will still be deemed to be adequate provided that the employer has identified why the OES has been exceeded and is taking appropriate steps to comply with the OES as soon as is reasonably practicable.

Maximum Exposure Limits (MEL)



An MEL is the maximum concentration of an airborne substance averaged over a reference period to which employees may be exposed by inhalation under any circumstances.

The control of exposure shall, so far as inhalation of that substance is concerned, only be treated as being adequate if the level of exposure is reduced so far as is reasonably practicable and in any case below the MEL.

Preventing or Controlling Exposure to Hazardous Substances

To prevent or control exposure to hazardous substances the company will follow the following hierarchy.

1. Eliminate

Wherever possible elimination of the use of the substances should be achieved.

2. Substitution

Substituting a less hazardous substance or the same substance in a less hazardous form.

3. Enclosure

Totally enclosing the process and hand.

4. Local Exhaust Ventilation (LEV)

Providing LEV at the source to remove the hazardous substances.

5. Dilution Ventilation

Provide sufficient general ventilation.

6. Restrict Employee numbers

Restrict the number of employees who may be exposed to the hazardous substances.

7. Period of Exposure

Reduce the period of exposure.

8. Cleaning

Regular cleaning of contamination from walls, etc., and disinfection where necessary.



9. Safe Storage

Provision of safe storage and disposal of substances.

10. Personal Protective Clothing (PPE)

Suitable PPE for the hazard involved.

11. Prohibition

Prohibiting eating, drinking and smoking in areas where contamination occurs.

12. Hygiene

Provision of adequate facilities for washing and storage of clothing and including where necessary arrangements for washing contaminated clothing.



HEALTH & SAFETY

POLICIES AND PROCEDURES

HS14

POLICY ON GENERAL SAFETY

Avoiding Slips, Trips and Falls

Slips, Trips and falls are the second most common accident following closely behind manual handling accidents.

All cables and leads should be secured and should be covered to prevent a tripping hazard. All other items should be stored in such a position that others cannot trip over them. When cleaning the extension cable must be placed in such a position to protect it from damage and to prevent creating a trip hazard.

Floor / Ground Conditions.

The floor surface itself can create a slip or trip hazard due to the floor being wet, greasy, uneven or poorly maintained therefore suitable footwear with ankle supports when required must be worn.

Where staff identify defective floor coverings they must contact their Supervisor and ensure it is logged on the appropriate form and appropriate action to make the area safe is instigated i.e. contact the cleaners, put up warning signs, cordon off the area etc...

Stairways and Walkways

- On Stairways, use handrails, and take one step at a time.
- Report worn treads and broken or loose stairs.
- Carrying of boxes etc on stairways should be avoided where possible.
- If loads need to be carried special care must be taken.
- You should never obstruct your vision with large loads.
- Employees and visitor must not run especially on stairways or in walkways near bends etc.
- Boxes etc must never be stored on stairways or in walkways.

Staircases being cleaned must be cleaned where there is no one using them and it is essential that there is not excessive cleaning solutions used as this can cause the floor to become very slippery.



Lighting

Lighting in the workplace including stairways etc must be sufficient enough to allow the job to be done safely. Where lights have failed or are flickering they must be repaired or reported to the relevant person. Lighting is especially critical where intense concentration is required.

Doors

Where there is glass panels or glass doors the glass will be clearly identified in compliance with the Workplace (Health, Safety and Welfare) Regulations 1992.

Employees and visitors should not loiter or converse near to doors where there is the potential for the door to be opened causing injury.

Remember fire doors must not be propped open; they must remain closed at all times.

Door in corridors etc where there is a risk of people being hit by the door due to poor visibility it will be assessed to whether there is a need to fit a vision panel in the door.

Housekeeping

It is essential from both safety and appearance that good housekeeping is maintained. Ensuring the workplace is kept in a tidy order with things being replaced after use minimises the number of hazards and therefore the potential for accidents.

Broken Glass

Use a broom and dustpan not your fingers to pick up glass - wrap it in paper. Ensure the area is cleaned as soon as possible to pick up splinters etc. Dispose of glass in a bin well covered to prevent secondary cuts etc.

Use of Guillotines

A guillotine must only be used where the blade is properly guarded. The operative must keep their fingers well away from the cutting blade at all times. Any defects in the guillotine must be reported immediately and it must be taken out of use until the defect is sorted.

Use of Shredding machine

When using a paper shredder the operator must either remove or tuck out of the way their tie and any loose clothing which can be caught in the shredder. People with long hair must ensure their hair is kept away from the shredding mechanism by at all times.



HEALTH & SAFETY POLICIES AND PROCEDURES HS15

RISK ASSESSMENTS

Risk assessments are an essential management tool to ensure employees and visitors are aware of specific hazards and risks in their work place.

Startright also recognises the importance of compliance with statutory legislation and as such ensures the following assessments are carried out, monitored and reviewed on a regular basis.

1. General risk assessments.
2. C.O.S.H.H assessments.
3. Manual handling assessments.
4. Display screen equipment & ergonomic assessments.
5. Personal protective equipment assessments.

All employees and visitors must ensure they read and understand the risk assessments and bring to their Supervisor's attention any points they wish to be clarified or if they wish to express a point in relation to the assessments.

Risk assessments are carried out to protect employees and visitors health and safety at work. It is essential employees and visitors follow the assessments or they risk serious injury.



HEALTH & SAFETY POLICIES AND PROCEDURES

HS16

SMOKING AT WORK

Tobacco smoke is considered to be harmful to health and the effects of passive smoking could be injurious to health and prejudice people's right to breathe fresh non polluted air.

Startright has a strict **NO SMOKING** policy within any part of the building.

Any employee found smoking in those areas will be disciplined. The act will be considered to be serious misconduct. This could lead to dismissal.

All visitors to the premises will be made aware of this **No Smoking** Rule.

Anyone found smoking in the designated **No Smoking** areas will be asked to safely extinguish the smoking materials immediately or leave the premises.



HEALTH & SAFETY POLICIES AND PROCEDURES HS17

MONITORING AND REVIEW

The Safety Adviser will make regular inspection tours of the factory, offices, warehouse and yard, looking out for any health and safety hazards. During these tours he will ask every employee for any comments on Health and Safety. He will bring to the notice of the Managing Directors and the Supervisor any Health or Safety hazards which he finds.

The results of the tour, plus any action taken or required in order to reduce the risks from those hazards will be recorded.

An annual meeting will be convened, involving the Managing Directors, Supervision and Health and Safety Adviser in order to review the Health and Safety Management Systems, and the effectiveness of control measures implemented.

The results of these meetings will be recorded.



HEALTH & SAFETY
POLICIES AND PROCEDURES
HS18

ASBESTOS

THERE IS NO ASBESTOS PRESENT IN STARTRIGHT'S
BUILDING



HEALTH & SAFETY POLICIES AND PROCEDURES

HS19

POLICY ON WELFARE ARRANGEMENTS

The policy of the Company is to provide adequate and appropriate welfare facilities for its staff so far as is reasonably practicable.

This policy will extend to

Toilets

The review and provision of adequate numbers of toilets and washbasins

The provision where possible of separate male and female toilets or rooms with lockable doors

The provision of clean facilities (cleaner employed)

Adequate supplies of toilet paper and for female employees a means of disposing of sanitary dressings

Facilities that are well lit and ventilated

Adequate soap and other agents

Hot and cold running water

Adequate sized bowls

Adequate drying facilities

Showers where necessary although at present these are not required

Consideration of the needs of those with disabilities

Drinking Water

Startright will ensure the provision of drinking water that is free from contamination and accessible to all employees. Cups will be provided for use by staff.

Where required water supplies will be identified as drinking water.

Meal Breaks

An area is supplied for staff to take breaks and eat meals. This area is maintained in a clean and hygienic state and has facilities for washing and preparing food.



Changing and Storage

Startright provides lockers and a changing area for use by staff. This changing room is readily accessible; leads to washing facilities; has seating; has hooks to hang clothes.

Pregnant Women

It is the policy of Startright that in the event of a member of staffs pregnancy that rest facilities will be provided where it is reasonably practicable to do so.

Review and Maintenance The provision of Welfare facilities will be reviewed and monitored on a weekly basis by the Works Manager and office Manager. Any areas for concern will be reported immediately to the Director to enable action to be taken.

A cleaner is employed who will monitor the facilities on a daily basis.

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POLICIES AND PROCEDURES

HS20

POLICY ON EQUIPMENT SAFETY ARRANGEMENTS

It is the policy of Startright that all work equipment is maintained in an efficient state, in efficient working order and in good repair.

The Directors will ensure that critical safety features of work equipment are checked frequently to ensure they are functioning correctly. These checks will form part of the organizations regular maintenance activities.

All equipment is risk assessed and then appropriate maintenance management techniques selected. These techniques include planned preventative maintenance to replace parts at preset intervals where required; condition based maintenance to monitor the condition of safety critical parts and carrying out the necessary maintenance to avoid hazards; and breakdown maintenance which is reactive after faults or failures have occurred-this will only be used in cases where the failure does not prevent an immediate risk and can be corrected before risk occurs.

The policy extends to:

- Provision of training in the use of work equipment
- Selection of the right work equipment for the task
- ensuring that maintenance records and logs are kept and are up to date

POLICIES AND PROCEDURES

HS20 Legionnaires Disease

Stagnant water favours Legionella growth. To reduce the risk Startright will flush out infrequently used outlets (including showerheads and taps) at least weekly and clean and de-scale shower heads and hoses at least quarterly.