



Health and Safety

HAE EHA  
**Business  
Guard**

# Health & Safety Policy

**FLYING HIRE LTD**  
**APRIL 2024**

HEALTH & SAFETY | RISK MANAGEMENT | HR & EMPLOYMENT LAW | TRAINING | ENVIRONMENTAL & QUALITY MANAGEMENT

**HAE EHA Business Guard, 9 Lord Street, Gainsborough, Lincolnshire DN21 2DD T 0121 380 4612**

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## Health and Safety Policy Amendment Sheet

### Record of Amendments

Issue number	Date	Index reference	Brief description of amendment
1	26/11/2018		First Issue
2	April 2020	Sect 2.24 Page 29 Sect 2.25 Page 30 Sect 2.26 Page 31	Annual Review Added Sections: <ul style="list-style-type: none"> <li>• Driving Vehicles for Business Use – Grey Fleet</li> <li>• Isolation and Lock Off procedures</li> </ul> Loading and Unloading Machinery and Equipment
3	November 2020		Annual Review Nominated Person updated - throughout
4	February 2022		Annual Review – New consultant
5	April 2023		Annual Review
6	April 2024		Annual Review

# **PART 1 STATEMENT OF INTENT**

## **Health and Safety Policy Statement**

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

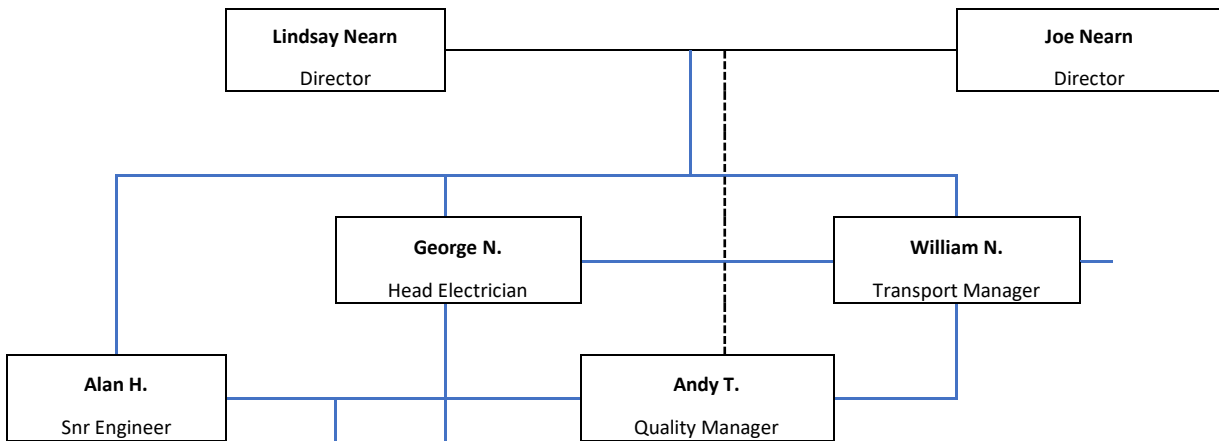
Signed:

Lindsay Nearn  
Director, Responsible for Health &  
Safety 12/04/2024



## PART 2 COMPANY ORGANISATION AND RESPONSIBILITIES

### Company organisational chart – Management structure



Stallard Kane Ltd have been appointed to provide external health and safety advice, located at:

**Head Office:**

9 Lord Street  
Gainsborough  
Lincolnshire  
DN21 2DD

**Telephone no:**

01427 678660

## **PART 2 RESPONSIBILITIES**

The Company has responsibilities under health and safety legislation towards:

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

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

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

### **Every employee must:**

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

## **Managing Director – Lindsay Nearn**

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

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

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



## **Directors Responsibilities**

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

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

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

## **Nominated Person for Health and Safety – Andy Tyler**

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

- The development and ongoing review of this policy, with the assistance of the external Health and Safety Advisors, Stallard Kane Ltd.
- Health and safety on a day to day basis – implementation of health and safety procedures, precautions and controls
- Undertaking risk assessments within their department (give guidance)
- Encouraging the highest possible standards of health and safety within their department by effective communication and consultation with employees
- Monitoring standards of health and safety within their areas of concern
- Ensuring good standards of housekeeping
- Ensuring COSHH Risk Assessments are carried out within the area of their responsibility
- The provision and maintenance of suitable personal protective equipment
- Ensuring staff attend all training sessions
- Carrying out hazard spotting checks of their department
- Assessing and meeting health and safety training needs

## **Competent Health and Safety Advisor**

Stallard Kane Ltd have been appointed to advise and guide our company on health, safety and welfare issues related specifically to our business undertakings. Stallard Kane Ltd will be responsible directly to the Directors, and the Nominated Person for Health and Safety within our company.

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

- Advise on the application and maintenance of our Company Health and Safety Policy arrangements
- Maintain an up-to-date knowledge in matters of legislation and regulations as they apply and affect the Company and its Health and Safety Policy
- Advise the Directors and the Nominated Person on any related safety matters
- Monitor the Company's health and safety status by auditing the Health & Safety Management System to guide our compliance with current legislation and our company policy and standards
- Assist the Company's Nominated Person in maintaining a close liaison with the Health and Safety Executive inspectors and other appropriate organisations and departments relevant to our undertaking
- Advise Company Directors, and the Company's Nominated Person on training requirements for employees ensuring they are competent to carry out detailed tasks within the parameters of current safety legislation
- Give advice on interpretation of legal requirements, working with the company's Nominated Person
- Advising and giving assistance with the strategy for implementation of this policy
- Where requested, provide assistance with investigations of serious accidents / conducting investigations
- Assist the Company's Nominated Person with revising this policy in the light of experience or legal change
- Advise upon the visit of an Enforcement Officer

## **Manager and/or Supervisor**

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

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

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

## **Employees**

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

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

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

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

### **1.0 Systems and Procedures**

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

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

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

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

## **1.1 Consultation with employees**

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

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

In particular, we will discuss the following:

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

The meetings will be formal and the minutes of the meeting will be documented and displayed on company health and safety notice boards.

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

### **2.1 Communication with employees**

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

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

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

## **2.2 Safety Training**

### **Basic Training Considerations**

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

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

### **Managerial Training**

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

### **Safety Advisor Training**

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

## **2.3 Fire Safety**

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

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

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

## **2.4 Manual Handling**

### **Responsibilities**

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

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

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

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



## **Manual Handling Risk Assessment**

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

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

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

## **Handling and Stacking**

When handling, employees must use mechanical devices wherever possible.

Manager and/or Supervisors will ensure that mechanical handling devices are available and that materials are correctly stacked so that mechanical devices can be used safely.

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

Manual handling methods to avoid injury should include:

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

## **Personal Protective Equipment**

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

## **Manual Handling Training**

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

## **2.5 Risk Assessment**

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

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

Specific risk assessments will include:

- Manual Handling
- PPE
- COSHH
- Fire
- Machinery, Plant and Equipment where applicable

## **2.6 First Aid**

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

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

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

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

## **2.7 Accident Procedures**

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

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

## **2.8 Statutory Notifications of Accidents/Dangerous Occurrences**

When a specified injury or dangerous occurrence has occurred, the HSE will be notified via, either the Incident Control Centre, or by the online notification form F2508 which will be completed without delay, and not exceeding 10 days of the incident. Others to be notified as soon as possible are Stallard Kane Ltd and the Company's insurers.

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

Where a person is absent from work or unable to perform their normal working duties as a result of a work-related incident/accident over seven consecutive days, the HSE will be informed within 15 working days from the day of the accident, by use of the HSE's online report form, F2508.

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

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

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

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

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

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

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

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

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

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

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

- The way the work was organised, carried out or supervised
- Any machinery, plant, substances or equipment used for work
- The condition of the site or premises where the accident happened

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

#### **Types of reportable injury**

##### **Deaths**

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

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

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

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

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

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

## **Injuries to non-workers**

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

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

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

## **Reportable dangerous occurrences**

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

For example:

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

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

## **Reportable occupational diseases**

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

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

## **Exemptions**

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

- Medical or dental treatment, or an examination carried out by, or under the supervision of, a doctor or registered dentist
- The duties carried out by a member of the armed forces while on duty
- Road traffic accidents, unless the accident involved the loading or unloading of a vehicle
- Work alongside the road, e.g. construction or maintenance work
- The escape of a substance being conveyed by the vehicle; or a train

## **Recording requirements**

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

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

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

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

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

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

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

**PPE assessment:** In accordance with the Personal Protective Equipment at Work Regulations 2022, an assessment of the PPE requirements of each employee will be made using the PPE Issue Record Form. For the purposes of co-ordinating safety management, the PPE assessment will be included in the Company's general assessment procedure detailed below.

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

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

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

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

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

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

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

PPE which has a shelf life or maximum usage period will be replaced in accordance with manufacturer's instructions.

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

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

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

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

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

## 2.10 Respiratory Protective Equipment (RPE)

Flying Hire Ltd is aware of the concerns regarding the correct and safe usage of Respiratory Protective Equipment (RPE), specifically in respect of facial hair. The below information makes clear Flying Hire Ltd position on RPE.

Where RPE is used as a control measure under Health and Safety Legislation (Control of Substances Hazardous to Health Regulations 2002 reg.7(3)(c), Control of Lead at Work Regulations 2002 reg.6(3)(c), Control of Asbestos Regulations 2012 reg.11(4)), it is vital that the selected RPE is adequate and suitable.

Many of the gases, vapours and dusts that cause serious damage to lungs and other parts of the body can be invisible to the naked eye and RPE is designed to protect employees from these hazardous substances that can cause serious illness and disease.

Flying Hire Ltd will prevent or control the exposure of employees to hazardous substances at work. Employees have a legal duty to cooperate with their employers and use control measures provided, including RPE, in accordance with the instruction, information and training provided.

RPE must reduce exposure to as low as reasonably practicable, and in any case to an acceptable level - below any applicable Workplace Exposure Limits or Control Limits. To ensure that the selected RPE has the potential to provide adequate protection for individual wearers, the Approved Code of Practice's (ACoPs) supporting COSHH, CAR and CLAW, which stipulate that tight-fitting RPE must be fit tested as part of the selection process. RPE Face fit testing will be conducted by a competent person. This will help to ensure that inadequately fitting facepieces are not selected for use. Ill-fitting facepieces can create inward leakages of airborne contaminants.

Facial hair / stubble and beards make it very difficult to get a good seal of the mask to the face and this renders the RPE ineffective exposing employees to the risk of hazardous substance inhalation and the associated damage to an employees lungs and health

Should employees choose not to be clean shaven when carrying out duties requiring RPE, subsequently preventing them from carrying out their duties safely,

Failure to comply with this policy may result in a disciplinary action under our disciplinary procedures.

If there is a good reason preventing employees from being clean shaven, such as religious or medical requirements, then employees must report this to their Manager and/or Supervisor and Flying Hire Ltd will look at any appropriate reasonable adjustments.

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

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

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

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

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

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

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

**COSHH Assessment:** A COSHH Assessment will be carried out for every substance, or where practicable on substance groups, i.e. solvent based paints grouped onto one assessment.

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

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

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

COSHH Assessments will be reviewed at the following times:

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

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

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

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

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

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

The Hazard Safety Data Sheets for all substances being stored will be available at the storage facility.

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

All spillages will be soaked up using sand or chemical dry granules, contaminated materials are then to be disposed of in accordance with local authority rules. Hazardous substances are not allowed to enter any drain or watercourse.

The Director will be informed of any substantial spill immediately.

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

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

## **2.12 Legionnaires Disease**

All reasonable steps will be taken to identify potential legionellosis hazards and to prevent or minimise the risk of exposure.

At risk systems include the hot and cold water storage and distribution systems.

To achieve control of legionella bacteria the company will implement the following:

- Conduct a suitable and sufficient risk assessment to identify potential risks and implement measures to either eliminate or control risks
- From the above, establish measures to ensure avoidance of conditions favouring growth of organisms
- As far as practicable, water systems will be operated at temperatures that do not favour the growth of legionella
- The use of materials that may provide nutrients for microbial growth will be avoided.
- Corrosion, scale deposition and build-up of bio films and sediments will be controlled, and tanks will be lidded

### **Avoidance of Stagnation**

Dead-legs, which occur when water services leading from the main circulation water system to taps or appliances, are used only intermittently and other parts of systems which may provide a reservoir for infection will be identified and where possible eliminated.

### **System Maintenance**

Water systems will be disinfected by an effective means before being taken into service and after shut downs of five or more days. Plant will be regularly inspected and maintained (e.g. by monthly visits from a water treatment specialist). Plant will be disinfected periodically (normally twice yearly) by chlorination or by temporarily raising water temperatures.

Biocides may be used to control microbial growth. Maintenance personnel must wear appropriate protective clothing.

### **Sampling**

Sampling for legionella will not normally be necessary, unless in the case of an outbreak or to monitor the effectiveness of precautionary measures. Weekly monitoring of chemical and microbiological water quality will be carried out to give a useful indication of the state of the system.

### **Record Keeping**

Records will be kept of all maintenance, temperature monitoring and sampling carried out.

Selection, training and competence of persons carrying out control measures will receive appropriate training and supervision, so they are able to perform their duties competently.

### **Action in the Event of an Outbreak**

A contingency plan in case of an outbreak of legionellosis will be prepared. This will include the:

- Identification of people who may have been exposed
- Involvement of public health authorities
- Dissemination of information to employees and other interested parties as to the nature of the risks.



## 2.13 LPG Storage and Carriage

Good practice in handling, loading, and unloading will minimise the risk of accidental gas leakage and consequently the major hazard, fire.

Gas cylinders will be stored within gas cages, full and empty cylinders will be kept separate with suitable signage displayed.

The transportation of cylinders is governed by the Road Traffic (Carriage of Dangerous Substances in Packages, etc.) Regulations 1992.

Cylinders, full or empty, will be stood upright, valves uppermost and be properly secured to prevent movement. Adequate ventilation will be provided and an open vehicle will be used where possible. A suitable fire extinguisher, e.g. Co<sub>2</sub>, will be readily available. The driver will carry a "Tremcard" (or equivalent information) and he will have been adequately trained in matters such as emergency procedures.

Cylinders which are part of equipment, such as tar boilers, together with one spare cylinder (where the equipment uses only one cylinder) are exempt from the Road Traffic (Carriage of Dangerous Substances in Packages, etc.) Regulations, but the basic precautions detailed above will be observed.

**"The carriage of more than one spare cylinder attracts the full provisions of the regulations."**

Suitable signage will be displayed on the rear of any vehicle carrying gas cylinders.

The maximum number of cylinders in total or in weight will not exceed the Regulation limits.

## 2.14 Health Surveillance Procedure

The Managing Directors of Flying Hire Ltd have employed the services of an external occupational health provider (OHP) to carry out occupational health surveillance (OHS) of our employees. Details of who the current provider is can be requested from the Directors.

The OHP will be informed of the tasks carried out by the employee that requires OHS and their professional advice will be taken on what tests need to be carried out, these may include skin checks, audiometry tests and lung function tests but may include others if deemed necessary.

The OHP will provide Flying Hire Ltd with the outcome of the individuals tests as either a pass, fail or requires a retest. If a retest is required, this will be arranged with the OHP.

OHS results will be stored on an individual employee's personal file on the Company's computer system that is backed up. This has all the required protection under the current GDPR regulations.

The results will take the following format:

- The employees name and National Insurance number
- The substance/s they are exposed to, and when (start date, frequency of use)
- The surveillance test/s that is/are done on them, and the tester
- The outcome e.g. passed / retest / failed

The OHP will be asked to provide generalised non-personal results to give an indication if overall health (tested) of the work force has deteriorated since the last tests, to help ascertain if the Company's control methods are being effective.

If an employee was unable to get a pass in a required test then this would be dealt with in conjunction with the employee, the OHP and our external HR provider to gain the most desirable outcome.

The above data will be kept for a minimum of forty years.

If the employee leaves Flying Hire Ltd employment and requests it, a copy of these records will be passed to them.

Records of ex-employees will be kept or not inline with the legislation at the time.

If Flying Hire Ltd is taken over or merged by another Company the above records will be kept as part of the new Company.

If Flying Hire Ltd were to cease trading for any reason the above occupational health records will be offered to the local HSE office (or its successor) for safe keeping.

If Flying Hire Ltd were to cease trading for any reason and the local HSE office (or its successor) were unable to take the occupational health records they would then be offered to the separate individuals ensuring they only received the records related to their own health.

If OHS indicates that an employee has a health condition that requires to be reported under the RIDDOR regulations, details will be passed to our external health and safety consultants who will report on our behalf, keeping the Directors informed at all stages.

New employees within areas of the Company that require OHS will be given this at the first opportunity and the records kept as above.

Prior to the OHS taking place, a tool box talk, summarising all the above, will be given to employees who are required to undertake it.

Periodic toolbox talks will be given to refresh employees understanding of the importance of carrying out self-checks on skin as instructed by the OHP and the importance of the use of hearing protection and any other PPE used.

Flying Hire Ltd are responsible for ensuring that the above is carried out and will review this procedure annually.

## **2.15 Workplace Equipment Maintenance**

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

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

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

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

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

## **2.16 PUWER – Provision of Work Equipment Regulations 1998**

### **Work Equipment – The Company**

The Company recognises the need for suitable, safe and regularly maintained work equipment in accordance with the Provision and Use of Work Equipment Regulations 1998 (PUWER).

Therefore, the Company will always aim to comply with PUWER by:

- Regularly maintaining work equipment by competent personnel
- Assess the suitability of work equipment supplied by the Company
- Provide training in the use of work equipment supplied by the Company
- In addition to training, providing technical and safety information in regard to work equipment to employees as necessary or upon request.
- Keep up to date maintenance and training records of work equipment
- Consult employees in matters of health and safety in the workplace
- Perform risk assessments on the use of work equipment

The Company will elect individuals responsible for the maintenance and provision of work equipment to also act as a direct point of contact for employees.

## **Work Equipment – Employees**

Work equipment can be defined as any equipment supplied by Flying Hire Ltd for Company business.

Under the Provision and Use of Work Equipment Regulations 1998 (PUWER) Flying Hire Ltd must maintain and supply work equipment suitable for its intended use. Therefore, whenever an employee uses work equipment they must:

- Only use equipment when authorised and trained to do so
- Avoid modifying equipment outside of the manufacturers' specification
- Check the equipment beforehand for any defects
- Only use equipment suitable for the task
- Use all equipment in compliance to Health & Safety Regulations
- Report any defects to their immediate Manager and/or Supervisor
- Cooperate with management when asked to return equipment for inspection / maintenance / calibration

### **2.17 Isolation and Lock-off Procedures**

Where maintenance requires that normal guarding is removed, or access is required inside existing guarding, the Company will implement additional measures to protect the health and safety of our employees (and other in the vicinity), from dangers of the mechanical, electrical and other hazards that may be exposed. We control this by:

- Identifying what isolation / lock off procedures are required, and in what circumstances – such as cleaning or maintenance
- Implementing and developing the isolation / lock-off procedure including, risk assessment and safe systems of work / permit to work.
- Ensuring isolation / lock-off procedures are formally communicated to the necessary personnel to ensure they are fully understood
- Only authorising competent / trained persons to carry out this work.
- Ensuring that the effectiveness of the isolation / lock-off is verified by a suitably competent person, before working on the equipment / machine
- Ensuring isolation / locking-off of equipment is carried out under supervision to ensure the procedures are followed
- Monitoring and reviewing the Isolation / lock-off procedure and control measures to ensure that it is still working effectively

### **2.18 Premises and Welfare**

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

Where Company employees are required to undertake work on site, the Managing Director Responsible for Health and Safety will ensure at the planning stage, that the requirements for welfare provision are suitably assessed and provisions made before work commences on site.

## 2.19 Electricity

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

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

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

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

## 2.20 Display Screen Equipment

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

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

## 2.21 Alcohol and Drug Abuse

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

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

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

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

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

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

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

**Consumption of alcohol or illegal non-prescription drugs in breach of this policy is deemed a gross misconduct offence and may result in further formal action being taken under the organisations disciplinary procedure. Depending on the circumstances, such action may lead to summary dismissal, that is, dismissal without notice or any compensation.**

## **2.22 Company Smoke-Free Policy**

### **Purpose**

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

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

### **Policy**

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

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

### **Implementation**

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

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

### **Non-compliance**

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

## **2.23 Stress**

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

This includes:

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

As far as reasonably practicable the Company will:

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

## **2.24 Lone Workers**

Often in the course of our business, people are sent into a working situation on their own. This would be when it is deemed that the job is of such a nature that a single person could competently and safely complete the tasks required.

Where lone working is required a risk assessment shall be carried out and appropriate controls defined and implemented. We will ensure that lone workers are not placed at more risk than other employees so each individual assignment must be examined to assess all risks by considering certain points and guidelines.

## **2.25 Safe Working at Height**

### **Responsibilities**

Manager and/or Supervisors will ensure that all persons under their control, including any sub-contractors, have adequate knowledge of this procedure and comply with it at all times. They must also ensure that all operatives under their control are correctly trained in the safe use of any equipment which is used to gain access to work at height.

Manager and/or Supervisors will also have responsibility for correctly identifying work activities and providing all necessary equipment for working safely at height.

Work activities and compliance with this procedure will be monitored by Management on an on-going basis.

Employees must comply with this procedure and ensure that all access and working areas are used correctly and their integrity is not compromised. Employees must not use any unauthorised access or working platform, improvised systems for access to height is strictly forbidden.

### **Purpose**

This procedure provides a guide for the correct means of safe access which must be used when working at height. It will, when used correctly, prevent the risk of injury in the event of a fall from height or the risk from falling objects and will ensure that suitable and sufficient steps are taken, so far as is reasonably practicable, to prevent persons from gaining unsafe access to any work place.

The introduction of the Management of Health and Safety at Work Regulations 1999 reinforced the general obligations placed on employers by the Health and Safety at Work Act 1974 to provide a safe place and safe system for work. This obligation has been further enforced by the introduction of the Working at Heights Regulations 2005 (WAH). The procedure detailed below is aimed at implementing the requirements of this legislation.

### **Scope**

This procedure will apply to all Company activities where work at height is undertaken and will include the activities of any sub-contract companies.

### **Risk Assessment**

Work at height will be included in the Company's General Risk Assessment Procedure as appropriate. Where task or site-specific working at height activities are required, these activities will be risk assessed as individual tasks and communicated to employees involved in undertaking the activity.

Safe means of access provided will be in accordance with the hierarchy detailed below.

### **Definitions**

**Working at Height**

Working at height means work in any place, including a place at or below ground level where a fall could result in injury or harm. Working at height also includes obtaining access to or egress from such place while at work, except by a staircase in a permanent workplace.

**Access/Egress**

The terms are comprehensive and refer to anything that can reasonably be regarded as means of entrance to, or exit from, a place of work, including ascent and descent. This access must be safe and kept properly maintained for any person working there.

**Permanent Working Platform**

This is part of an existing structure having a permanent floor with secure handrails or fencing on all sides, it will also have protection against falling off.

**Temporary Access Platform**

This means any temporarily structure on or from which persons perform work and any temporarily structure which enables persons to gain access to, or allows materials to be taken to, any place included in the following:

- Scaffold – standing, slung, cantilever
- Mobile or zip up scaffold towers
- Trestles
- Cherry pickers, mobile elevated work platforms
- Scissor lifts
- Crane box, man baskets
- Ladders, steps

All of the above shall be assessed prior to works being undertaken.

### **Inspections**

All the above forms of access equipment require inspections in accordance with statutory duties. These inspections must be carried out by competent persons and will be recorded in the appropriate inspection register. Inspections will be co-ordinated by the Managing Directors who are responsible for ensuring that all equipment is recalled for inspection and passed as safe. Equipment will be marked, or colour coded to indicate that it is safe to use.

### **Procedure**

#### General Rules

Wherever possible, it is the policy of the company that working at height will be avoided and other avenues shall be explored and adopted where reasonably practicable.

Where working at height cannot be avoided, the hierarchy of control will be followed.

Work at height will be carried out from permanent platforms where they exist.

Where permanent platforms do not exist, a temporary form of access will be provided to prevent, as far as is reasonably practicable, the risk of falling.

Work at height on any platform must be carried out from within the confines of the correct access provided.

All working platforms must be so constructed as to prevent objects from falling off.

Prevention from falls by using a safety harness with fall arrest system will only be considered as a last resort where no other means of safe access is possible.

Every scaffold must be suitable for the task for which it was constructed. Employees must not under any circumstance step outside the confines of the safe access provided.

At no time should the integrity of any means of access be altered or tampered with by employees. All alterations or any other maintenance will be carried out by approved persons who have been authorised to carry out the work.

Every scaffold must be securely tied to the structure or building unless it has been constructed to create its own stability.

The form of safe access selected must be adequate for the range of tasks that are to be carried out from it.

Only approved access equipment will be used to work at any height above or on floor level. Improvised access will not be permitted. Employees will only be allowed to work on, or operate, access equipment for which they are adequately trained.

### **Specific Training**

Specific training will be required for the following forms of access equipment:

- The construction of any scaffold
- The erection of any mobile scaffold tower
- The operation of



- Mobile elevated work platforms/cherry pickers
- Scissor lifts
- Man baskets
- Crane baskets

In addition, operatives will be given specific safety awareness training for roof work and the correct use of safety harnesses. This training will be provided by approved training organisations in accordance with statutory requirements.

### **Ladders**

Ladders will be used for temporary access only and must be secured by being tied to the structure to prevent them from falling.

All ladders must be inspected and marked as safe (see above).

### **Fall Arrest Systems**

All fall arrest systems must conform to EN361 and must be a full body type with the correct length lanyard attached which conforms to EN355. Fall arrest systems must be secured to an anchorage that is capable of withstanding shock load.

All persons who are required to use fall arrest systems must be trained in pre-use inspections, correct fitting and storage.

Fall arrest systems must be tested and issued with a test certificate, they must be inspected before use every time.

### **Safe Access Hierarchy**

The list of safe access detailed below is intended as a guide to the order in which the provision of access to height should be considered. When considering the means of access, start with the safest. If that is impractical, consider the next safest option until the most practicable solution has been found.

- Permanent platform
- Fixed scaffold
- Mobile elevated work platform
- Scissor Lift
- Tower scaffold
- Safety netting
- Fall arrest system (only as a last resort)
- Ladder/steps (temporary access only).

## **2.26 Contractors/Sub-contractors**

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

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

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

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

## 2.27 Asbestos

In the event of asbestos being found or suspected, work will immediately stop in that area and the matter will be reported immediately to the Site Foreman, assuming he is not aware of the circumstances at that point. Under normal circumstances the suspected asbestos will not be touched, except to wet it or contain any airborne fibres, and wherever possible keep persons away from it. A specialist company will be approached who will determine the next course of action which should, in the first instance, be to take a sample for analysis. The next course of action will be dependent on this result.

In compliance with the Control of Asbestos at Work Regulations 2012, and subsequent legislation, adequate information, instruction and training is given to employees to enable them to be aware of the health hazards of asbestos; how controls, protective equipment and work methods can reduce these hazards; and the correct use of maintenance of control measures.

Prior to commencing work on projects that may contain asbestos containing materials (ACMs) the following methods of assessment will be deployed:

- A risk assessment shall be carried out on the task and areas of work in the first instance
- Dependant on the findings of the risk assessment:
- Where insufficient information is available to undertake works safely, an R and D (Refurbishment and Demolition) Survey shall be undertaken by competent persons
- A subsequent Asbestos Management Plan shall be developed and implemented for the management of any remaining asbestos or ACMs. The plan will be reviewed on an annual basis as a minimum or as advised by the asbestos surveyor

Any asbestos survey undertaken will be in accordance with HSG 264: Asbestos the Survey Guide and also incorporate the advice and guidance within the Control of Asbestos Regulations 2012. Approved code of practice and guidance and registers of ACMs will be located in the premises.

## 2.28 Workplace Noise Control

### Responsibilities

The Managing Director Responsible for Health and Safety will ensure that this procedure is implemented and complied with in all areas of work where a hazard is identified.

The Managing Director will ensure that the persons under their control are aware of the requirements of this procedure and that they are complied with at all times. They will also ensure that the correct protective equipment is provided as required.

All employees will be required to co-operate with the Company in its attempts to reduce or control noise exposure.

**Noise Surveys:** In accordance with the Control of Noise at Work Regulations 2005, the Company will take all reasonable steps to identify workplace noise levels. The list, once created, will form part of this procedure.

Noise surveys will be carried out by competent persons using correct equipment and will be recorded in writing. Tool manufacturers will be consulted to establish individual noise levels.

Noise surveys will be reviewed at the following times:

- If work patterns change significantly
- If machinery is moved or if new machinery is installed
- At any other time it is believed that the survey is no longer valid

Where the exact noise level created on site or by an individual tool cannot be established, the maximum possible protection will be provided until the matter is resolved.

**Risk Assessment:** Wherever possible, noise assessment for site activities will be included in the risk assessment procedure. Information supplied by manufacturers will be used to determine whether a tool used in a work activity is creating a noise hazard. Site environment noise levels will also form part of the assessment.

**Noise Action Levels:** The Control of Noise at Work Regulations 2005 established noise action levels above which hearing will be damaged. These are based on dosage averaged over a working day.

The action levels are expressed as dB(A):

- First Action Level – 80 dB(A)
- Second Action Level – 85dB(A)

Where the Company operates a permanent workshop, the following actions will apply:

If the First Action Level (80 dB(A)) is reached or exceeded the Directors will:

- Reduce the risk of damage to hearing to the lowest level possible by means other than issuing PPE
- Inform all persons who may be exposed of the risk to their hearing and of the availability of hearing protection
- Provide hearing protection at the employee's request
- Ensure a warning notice is affixed stating that hearing protection is mandatory when the tool is being operated. This rule will apply to all persons who are within 12 metres of the tool.

If the Second Action Level (85dB(A)) is reached or exceeded the Directors will:

- Reduce the exposure to noise to the lowest level possible by means other than issuing PPE
- Identify all areas where the Second Action Level is reached and post notices at all entrance points to those areas. The notices must warn of the hazards and state that the wearing of hearing protection is mandatory
- Post notices on all machinery which creates noise at or above the Second Action Level
- Issue correct hearing protection to all persons who may be exposed, WHICH MUST BE WORN
- Issue hearing protection to all persons in less noisy areas at their request
- Implement occupational health surveillance for employees exposed to noise levels above 85dB(A)

Where, as a result of a risk assessment, the general site is deemed to be a noise hazard, the Directors will ensure that all persons who enter or remain on site wear hearing protection at all times.

**Personal Protective Equipment:** Where the need for PPE is identified as a result of any noise survey or risk assessment, it will be issued as soon as possible. Without prejudice, any hearing protection provided will reduce the amount of noise reaching the ear to an acceptable level – specialist advice will be obtained where necessary.

**Training:** All employees will receive general noise awareness training as part of the Company's safety programme. However, where hearing protection is issued, specific training in its correct use, storage and maintenance will be given.

## **2.29 Vibration Control**

Under the Control of Vibration Regulations 2005 we will look to eliminate or control the exposure to vibration in the workplace to the lowest level that is reasonably practicable (Regulation 6).

Hand arm vibration can be a significant health risk wherever powered hand tools are used for significant lengths of time.

The Company will look to eliminate vibration risk where possible at the planning stage by engineering out the risk at source. Where this is not possible the risk will be reduced to as low as is reasonably practicable with regular monitoring of exposure levels and risk to employees. Health surveillance will be carried out on employees where regular and frequent exposure to vibration risk is evident using the Tier System Questionnaires.

The aim will always be to be PROACTIVE rather than REACTIVE when addressing vibration risk. The Company will follow good practice controls, currently promoted by the HSE, to help to eliminate or reduce vibration risk in our industry which are:

### **Selection of Work Equipment**

Tool selection can make a substantial difference to the vibration level but the tool must be suitable for the task and used correctly.

We will demonstrate a sound procurement policy for power tools and hand-guided machines considering the following:

- There is no reasonably practicable alternative method with no (or less) vibration exposure
- Equipment is generally suitable for the job (safety, size, power, efficiency, ergonomics, cost, user acceptability, etc.)
- Reduced vibration designs are selected provided the tools are otherwise suitable
- Declared vibration emission is not high compared with competing machines of similar capacity to do the job
- Information on likely vibration emission is available (e.g. from manufacturer, hire company, databases)
- Available information from the manufacturer or elsewhere on control of vibration risks through:
  - Maintenance (e.g. servicing grinders, sharpening drills and chisels)
  - Selection of consumables (abrasive discs, chisels, drills, etc.)
  - Correct operation and operator training (see below)
  - Maximum daily trigger times or maximum daily work done with the tool

### **Limiting Exposure Time**

Restricting exposure time (“finger-on-trigger” time) will be carried out to ensure exposure remains below the Exposure Limit Value (ELV), even after all reasonably practicable measures to reduce vibration levels are in place.

The Company will determine the maximum times using the exposure points system or supplier’s “traffic lights” tool category. Regular testing and monitoring using HAVI Meters will be carried out to ensure the ELV is not exceeded.

The Company will ensure that the exposure will be reduced to the lowest level that is reasonably practicable (Reg 6(2)), so the ELV will not be used as a target, if a lower exposure is reasonably practicable.

### **Other Risk Controls**

The Company, where possible, will look to control HAV risk by means other than reducing vibration exposure, this will be done by:

- The use of ergonomic aids, such as supporting the weight of the tool which reduce forces applied by operator
- Ensuring a suitable workplace temperature or provision of warm clothing and gloves
- Regular breaks from work involving vibration and encourage operators to exercise fingers

### **Information, Instruction and Training**

The Company will ensure employees at risk from vibration shall have received information on:

- The risks from HAV and how to help reduce them (see above)
- Arrangements for health surveillance and their duty to cooperate

Managers/Supervisors will look for evidence that tools are being used correctly, as recommended by the manufacturer. This may require operators to receive specified training which will be provided.

## **Health Surveillance**

The Company will provide health surveillance where the Exposure Action Value (EAV) is likely to be exceeded. As a minimum we shall:

- Use a periodic health screening questionnaire, both annually and for new employees (TIER system)
- Have arrangements in place for referral of relevant cases to an occupational health provider with HAVS expertise for diagnosis and ongoing monitoring
- Have arrangements in place to receive medical advice on management of affected employees
- Have arrangements in place for RIDDOR reporting of HAVS cases

## **Personal Protective Equipment**

Where the need for PPE is identified as a result of any vibration survey or risk assessment, it will be issued as soon as possible.

### **2.30 Permits to Work**

Works that are identified as being of higher risk will be controlled by the use of "Permit to Work".

Standard procedures are available from the Manager and/or Supervisor, covering work recognised as having special risks, e.g. excavation, roof work, entry into confined spaces, some electrical work, hot work and work involving asbestos etc.

These permits will be issued by a member of the Site Management Team to ensure safe systems of work are applied by Contractors.

The person receiving the permit must acknowledge receipt of it and must ensure that the specified works is done safely in accordance with any imposed conditions. He/she must also confirm when the works are completed and all areas or plant are safe. The permit must then be cancelled by the issuer.

### **2.31 Transient workers**

The Company accepts and understands its responsibility to protect all employees, including those classed as transient workers.

A transient worker, sometimes also known as a peripatetic worker, is defined as someone who works away from their normal work base either for part or all their work. It can also refer to someone who has no fixed work base. Risk assessments for transient workers will consider the type of work they are doing away from the normal work base - this would usually include:

- Working alone
- Late, evening and night shift work
- Working in confined spaces
- Violence towards staff
- Safe use and maintenance of tools and equipment
- Working with harmful substances, manual handling, and other health requirements such as health surveillance
- Provision, use and maintenance of personal protective equipment (PPE)
- First aid and emergencies

## 2.32 Driving Company Vehicles

When using a vehicle supplied by the Company, all employees will conform to all requirements of the Road Traffic Acts, associated legislation, and the Highway Code.

Where employees are driving in the course of their employment, or driving vehicles supplied by the Company they must:

- Ensure that the vehicle is serviced, maintained and operated in accordance with the manufacturer's guidelines
- Be in possession of a UK Driving Licence. This must be checked by their Manager and/or Supervisor every year and endorsements notified to the insurers (for Company vehicles and when driving their own vehicle on Company business)
- Ask their GP if any prescribed medicine will affect their driving ability; if so, employees must refrain from driving and inform their immediate Manager and/or Supervisor
- Not operate a hand-held mobile phone whilst driving – the punishment for such an offence is a £200 fine and six penalty points on their driving licence. If the employee is a new driver, having passed their test within the last two years, their driving licence will be revoked. (To obtain a new licence, both the theory and practical test will have to be retaken). Therefore, employees will not operate their hand-held mobile phone whilst driving – it is dangerous
- Wear glasses or lenses if prescribed for this activity
- Never drive Company vehicles under the influence of alcohol or illegal drugs or prescription medication which may affect their ability to drive safely

Employees driving vehicles will avoid over-the-counter medications such as anti-depressants, antihistamines for hay fever, nettle rash, asthmas, eczema or travel sickness preparations or cough and cold remedies, which can adversely affect their driving.

Before setting off employees will:

- Check tyre pressures and visual condition, tread depth (cuts or obvious damage, especially to the tyre walls) and general vehicle condition
- Check that all seatbelts are working and in good order, and worn by all vehicle occupants where provided
- Adjust driving techniques to suit weather and traffic conditions
- Ensure they have read through the Driving Company Vehicles section in the Employee Handbook

On arrival to destination or site employees will:

- Beware of un-metalled roads and soft ground on sites; and, where possible park off site (not in an area causing an obstruction to highway, site traffic or the emergency services)
- Observe all traffic management arrangements in place for the site
- Make sure the vehicle is secured and any valuable items, such as satellite navigation systems and mobile phones, stored out of sight

When driving on business on behalf of the Company and the vehicle is not supplied by the Company, employees must have full comprehensive insurance cover, to cover the driver and any passengers in the course of such business use. A copy of the insurance certificate will be required before driving on Company business.

### **2.33 Loading and Unloading of Machinery & Equipment**

We understand that the loading and unloading of machinery/equipment can be a dangerous task, and that heavy loads, moving or overturning cages can all lead to serious injuries or death.

Procedures for loading and unloading will be:

- To keep clear other traffic, pedestrians and people not involved in loading or unloading
- To maintain stability, vehicles will be parked on firm level ground, as far as reasonably practicable
- To ensure loads are spread as evenly as possible, during both loading and unloading, as uneven loads can make the vehicle or trailer unstable.
- To ensure loads are secured, or arranged so that they do not slide around.
- To ensure employees refer to the loading and unloading of machinery/equipment risk and method statements
- To ensure tail lifts are used where provided under a Safe System of Work. Employees will not use tail lifts if they have not been trained in their operation.

Only trained authorised employees will undertake these tasks

#### **Trailers and Towing**

Manager and/or Supervisor who have overall control of sites will make sure that coupling and uncoupling areas are well lit, with firm and level surfaces.

Any employees involved in trailers and towing will be aware and understand the risk assessments and method statements in place for these activities.

Drivers will be properly trained and have their work monitored by managers to make sure they follow a safe system of work.

The Company will ensure that:

- Tow brackets are suitable for the type of trailer being towed
- The towing brackets are fitted to the correct mounting points recommended by the vehicle manufacturer
- A device (audible or visual) is available to show that trailer indicators are operating correctly

The driver is to ensure that:

- The trailer is not overloaded
- The trailer is loaded on a flat level surface which is suitable for the total weight
- The brakes work and the brake safety wire is correctly connected
- All the lights work
- The number plate matches the vehicle

### **2.34 Loading & Unloading of Plant**

We understand that the loading and unloading of plant can be a dangerous task, and that heavy loads, moving or overturning vehicles can all lead to serious injuries or death.

Procedures for loading and unloading will be:

- To keep clear other traffic, pedestrians and people not involved in loading or unloading
- To maintain stability, vehicles will be parked on firm level ground, as far as reasonably practicable
- To ensure loads are spread as evenly as possible, during both loading and unloading, as uneven loads can make the vehicle or trailer unstable.
- To ensure loads are secured, or arranged so that they do not slide around.
- To ensure employees refer to the loading and unloading of plant risk and method statements
- To ensure ramps are used correctly where provided under a Safe System of Work. Employees will not use ramps if they have not been trained in their operation or can't secure the ramps to the vehicle or trailer.

Only trained authorised employees will undertake these tasks.

### **Trailers and Towing**

Directors and managers who have overall control of sites will make sure that coupling and uncoupling areas are well lit, with firm and level surfaces.

Any employees involved in trailers and towing will be aware and understand the risk assessments and method statements in place for these activities.

Drivers will be properly trained and have their work monitored by managers to make sure they follow a safe system of work.

The Company will ensure that:

- Tow brackets are suitable for the type of trailer being towed
- The towing brackets are fitted to the correct mounting points recommended by the vehicle manufacturer
- A device (audible or visual) is available to show that trailer indicators are operating correctly

The Driver is to ensure that:

- The trailer is not overloaded
- The trailer is loaded on a flat level surface which is suitable for the total weight
- The brakes work and the brake safety wire is correctly connected
- All the lights work
- The number plate matches the vehicle

### **2.35 Demonstrating to the End User**

The Company will provide clear instructions and information, and adequate training, for the employees. This should include:

- What hazards and risks they may face, if any
- What measures are in place to deal with those hazards and risks, if necessary
- How to follow any emergency procedures

The Company will ensure that the training is relevant and effective.

We will ensure that all persons who demonstrate work equipment to the end user, have received adequate training for the purposes of health and safety. This will include training in the methods which may be adopted when using work equipment, risks which may be present and the precautions to be taken.

“Adequate training” requirements will vary depending on:

- The complexity of the equipment.
- The prior knowledge of the “trainee”
- The job or activity
- The circumstances of the work (eg degree of supervision)

The training standard required will be adequate in ensuring the health and safety of the workers and any people who may be affected by the work, so far as is reasonably practicable.



## 2.36 Event Working Safety

Events works are carried out on various types of land, roads, and highways. Venues can be on both private and public land areas. The following arrangements will apply in all cases

- Full discussion will take place with the client and relevant local authorities as to the scope required
- A risk assessment will be carried out prior to any traffic signals or road signs being deployed
- A site plan will be drawn up along with a method statement and safe system of work to ensure that appropriate control measures are in place prior to the deployment of any traffic signals or road signs.
- All road works and warnings shall be in accordance with the provisions laid out in the New Roads and Street Works Act 1991, The Highways Act and the accompanying Approved Codes of Practice to include 'Safety at Street works'
- Where works affect other road users such traffic signs and barriers shall be erected to guide and warn traffic and pedestrians
- The works shall be suitably lighted and guarded in hours of darkness
- All traffic signs and barriers shall be removed immediately on completion of their requirement
- A risk assessment will be prepared for this along with a method statement to ensure that the appropriate control measures are in place
- All personnel working with signing, lighting and guarding in the highway will have been trained and assessed in accordance with the New Roads and Street Works Act 1991 and the relevant LANTRA Sector Scheme
- The client and or local authority will agree and sign off all works prior to commencement
- All personnel will wear the appropriate PPE
- All personnel will abide with all additional client health and safety requirements for the event in place
- Where required, a designated Manager and/or Supervisor will be in attendance.

## **Environmental Policy Statement**

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

Signed:

Lindsay Nearn

Director, Responsible for Health & Safety & Environmental issues  
12/04/2024

