

Health & Safety Policy



Company

GLENCO-HSP-001

Issue 1.2

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CONTROLLED DOCUMENT			
Copy Number:	Issue To	Date Issued	
Issue 1 No 002	Mark Norton - Director	February 2015	
Version history			
Version	Amendment Details	Date	Revised by
Draft A	Initial draft for comment	1st January 2015	MN
Draft B	Addition of Amendments	N/a	
Issue 2	Issued following confirmation from	1st February 2015	MN
Issue control			
Author:	Mark Norton		
Signature:			
Owner & approver:	Mark Norton		
Signature:			

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1.0 GENERAL STATEMENT FOR HEALTH, SAFETY AND ENVIRONMENT

Glenco Civil Engineers (Glenco) recognises the value of its people as key to its continuing business success and is committed in its duty to ensuring, so far as is reasonably practicable, the health and welfare of its employees, but also the focus on maintaining a positive Safety and Environmental culture.

Glenco fully accepts its responsibilities for other persons or stakeholders who may be affected by any undertaking through its activities ensuring compliance with relevant legislation and statutory provisions.

Glenco management is committed to providing and maintaining safe, healthy working conditions, safe equipment and safe systems of work; including adequate facilities and sufficient resources are allocated for supervision at all times, permitting health, safety or environmental issues to be communicated to senior management.

Glenco will appoint suitable competent persons to assist in meeting its statutory duties including where appropriate, specialists from outside the organisation.

Each employee will be given suitable and sufficient information, instruction, and training where applicable to enable the safe performance of any work activities undertaken.

It is vital to the success and implementation of this policy that each individual takes his or her legal obligation for ensuring the care of their own health, safety and welfare, including all other persons who may be affected by the work undertaken and whom may be affected by their acts or omissions. All persons, staff and employees or other stakeholders must co-operate with Glenco management to comply with all statutory duties.

The organisation and arrangements for health and safety are detailed in separate documents.

The policy will be reviewed regularly and monitored to ensure any legislative changes or impacts to its objectives are continually improved and achieved.

Signed:



Mr Mark Norton

Director

Glenco Civil Engineers

Date: 1st February 2015

2.0 POLICY AND PROCEDURES

This policy sets out the way the Glenco will comply with the requirements of the Health and Safety at Work Act 1974 and the relevant statutory provisions.

2.1 Monitoring

The Director responsible for Health & Safety shall monitor the implementation and effectiveness of this policy.

2.2 Review and Revision

2.2.1 This document shall be reviewed by the Director responsible for Health & Safety: -

- a) annually;
- b) in the light of any failure of the system;
- c) in the light of any changes in legislation.

2.2.2 All reviews shall be documented and a report sent through normal reporting channels to the Managing Director.

2.2.3 The Managing Director shall review all reports sent to him and where necessary ratify any proposed revisions to the Glenco's policy.

3.0 COMPLIANCE

Failure to comply with the requirements of any of the Glenco's Health and Safety Policies and procedures may result in disciplinary action.

4.0 PROCEDURES

Glenco Health Safety & Environmental Procedures, highlighted in the sections below, are supported with various forms and guidance documents to supplement and support information provided for project tasks or activities.

4.1 Fire and Emergency Procedures

4.1.1 The Glenco shall;

- a) establish and where necessary give effect to appropriate procedures to be followed in the event of serious and imminent danger to persons at work in their undertaking;
- b) nominate a sufficient number of competent persons to implement those procedures insofar as they relate to the evacuation of persons at work in their undertaking from their premises;
- c) provide sufficient information, instruction, and training necessary to:
 - i) ensure the health and safety of all employees in the event of serious and imminent danger to persons at work in their undertaking;
 - ii) ensure the health and safety of persons not in direct employment but working for Glenco in the event of serious and imminent danger to persons at work in their undertaking;
 - iii) enable Management and Supervisors to implement this policy.
- d) take all measures, in so far as is reasonably practicable, to monitor the effectiveness of this policy;
- e) ensure that all employees, and in particular duty holders, are provided with sufficient information, instruction, and training as is necessary to enable them to comply with local fire and emergency procedures.

4.1.2 All employees of Glenco shall:

- a) familiarise themselves and comply with the requirements of the local fire and emergency procedures for the area in which they are working;
- b) as far as is reasonably practicable, ensure that all visitors and contractors working under their control on Glenco's premises, are given such information, instruction and training as is necessary to ensure their health and safety in the event of serious and imminent danger to persons at work in their undertaking;

4.2 First Aid

4.2.1 Glenco shall:

- a) provide such equipment and facilities as are adequate and appropriate for enabling first aid to be rendered in the event of members of Glenco being injured or becoming ill at work;
- b) maintain suitable numbers of qualified first aid personnel to deal with minor accidents and emergencies in the workplace;
- c) ensure that all employees are informed of the arrangements that have been made in connection with the provision of first-aid, including the location of equipment, facilities, and personnel;
- d) ensure that all employees, and in particular duty holders, are provided with sufficient information, instruction, and training as is necessary to allow them to comply with first aid procedures.
- e) See additional company guidance and procedure documents.

4.3 Accident Reporting

4.3.1 Glenco shall, in accordance with the requirements of current statutory legislation, ensure that all:

- a) Any accidents are recorded, records of lost time accidents over 3 days are kept for 7 years;
- b) prescribed injuries, diseases, and dangerous occurrences are reported under RIDDOR to the HSE as follows
 - i) Lost time accidents of more than 7 days with injury resulting in inability to undertake normal duties (not including the day of the accident).
- c) employees, and in particular duty holders, are provided with the necessary information, instruction, and training to enable them to comply with accident reporting procedures.

RIDDOR online report: www.hse.gov.uk/riddor/report

RIDDOR Contact Centre on [0845 300 9923](tel:08453009923) (Mon-Fri 0830-1700)

(RIDDOR report must be made by 15th day from the incident)

- 4.3.2 The Director responsible for Health & Safety or his nominated representative will be responsible for ensuring that all accidents or near misses reportable under the current regulations are investigated and are fully reported to the appropriate Legislative Authority in good time.
- 4.3.3 All employees shall report all accidents, incidence, and near miss incidence involving any member of Glenco, as soon as practicable, where they occur:
 - a) on Glenco's premises;
 - b) whilst working for Glenco away from Glenco's premises;
 - c) whilst travelling to or from work.
- 4.3.4 All employees shall report all accidents, incidents, and near misses that involve contractors or visitors working on Glenco's premises and under their control, as soon as practicable.
- 4.3.5 All accidents and near miss incidence shall be recorded on Glenco's Accident / Near Miss Reporting Form by the responsible person – GCE Manager or site supervisor. The copies of the form when completed should

be distributed as follows:

- a) copy to the nominated person or Director responsible for Health & Safety
- b) one copy for the office record & the individuals file (kept secure under lock & key)
- c) one copy to be retained by the injured party or their representative where appropriate.

4.4 Display Screen Equipment

4.4.1 Glenco, in so far as is reasonably practicable, shall:

- a) ensure that suitable and sufficient analysis is carried out of all work stations on Glenco's premises which are used by display screen equipment users or operators, for the purpose of assessing the health and safety risks to which those persons are exposed in consequence of that use;
- b) take all necessary steps to reduce the risk identified to the lowest level reasonably practicable;
- c) ensure that all work stations on Glenco's premises used by display screen equipment users or operators, comply with the requirements of the Health and Safety (Display Screen Equipment) Regulations and any subsequent amended or incumbent legislation and codes of practise ;
- d) provide, if requested, all employees who habitually use display screen equipment as a significant part of their normal work with an appropriate eyesight test, prior to their employment and at regular intervals after they have become a user:
- e) if display screen users experience visual difficulties which may reasonably be considered to be caused by work on display screen equipment Glenco shall:
 - i) meet the cost of a basic pair of spectacles where these are required specifically for working with display screen equipment. (Any additional cost to be contributed by the work station user);
 - ii) take steps to incorporate changes of task for display screen users, to prevent intensive periods of on-screen activity;
- f) provide sufficient information, instruction, and training necessary to:
 - i) ensure the health and safety of all employees who are users of display screen equipment;
 - ii) enable Managers and Supervisors who are responsible for users of display screen equipment to implement this policy.

4.4.2 Where a problem arises which they believe may be associated with the use of display screen equipment, employees shall:

- a) inform their Supervisor or Manager immediately;
- b) in the case of an adverse health or medical condition, advise their General Practitioner as well as their Supervisor, Manager or the Director responsible for Health & Safety.

4.5 Manual Handling

4.5.1 Glenco, in so far as is reasonably practicable, shall:

- a) ensure all manual handling operations that carry a risk of injury to the participants are, wherever reasonably practicable, avoided by:
 - i) removing the need for the operation to be carried out;
 - ii) automating or mechanising the operation.
- b) ensure that where manual handling operations cannot be avoided, they are assessed by a competent person;
- c) ensure that any person working for, or on behalf of, Glenco does not carry out Manual Handling Operations that involve a risk of being injured, unless:
 - i) they are competent and able to carry out the work;
 - ii) they have received Manual Handling Training from a person competent to give such training;
 - iii) the works have been subject to a Manual Handling Risk Assessment which has been carried out by a competent person, and that a safe system of work has been documented and implemented that reduces the risk of injury to an absolute minimum;
 - iv) they have received suitable and sufficient information on the load to be carried.
- d) ensure that sufficient competent persons are appointed to carry out risk assessments of manual handling operations that carry a risk of injury to the participants and cannot be avoided;
- e) provide sufficient information, instruction, and training necessary to:
 - i) ensure the health and safety of all employees carrying out Manual Handling Operations that involve a risk of being injured;
 - ii) enable Management and Supervision to implement this policy.

4.5.2 Where a problem arises involving the manual handling of a load, all employees shall:

- a) immediately inform their Supervisor or Manager;
- b) in the case of an adverse health or medical condition, advise the employee's General Practitioner their Supervisor, Manager or the Director responsible for Health & Safety.

4.6 Training

- 4.6.1 In order to secure the health and safety of all employees Glenco, in so far as is reasonably practicable, shall provide health and safety training to new employees as part of their general induction training. See section 4.7 Induction.
- 4.6.2 Glenco shall, so far as is reasonably practicable, ensure that all employees undertake regular annual training in general health & safety as well as fire and where necessary, specialist training to enable them to work safely
- 4.6.3 Specialist training will be provided for safety representatives, floor wardens, first aiders, display screen users, and employees whose job involves manual handling.

4.7 Induction

- 4.7.1 Glenco shall ensure, so far as is reasonably practicable, that all new employees go through induction training, in their working environment, as soon as is practicable once they have joined and where possible before commencing work. Where possible Glenco's induction will take place prior to the new employee commencing work within their place of work.
- 4.7.2 Glenco Induction Process will cover the following:
 - a) the corporate induction and
 - b) the site induction
- 4.7.3 The first part of the induction, the Corporate Induction will consist of the following topics:
 - a) an overview of health and safety legislation including:
 - i) the Health and Safety at Work, etc. Act 1974.
 - ii) the Management of Health and Safety at Work Regulations.
 - iii) duties of employers to their employees under the Section 2 and 9 of the Health and Safety at Work, etc. Act 1974.
 - iv) duties of employees at work under the Section 7 and 8 of the Health and Safety at Work, etc. Act 1974.
 - b) an overview of the health and safety arrangements and procedures including:
 - i) persons responsible for Health and Safety;
 - ii) persons responsible for Fire Safety and Security;
 - iii) how to contact persons responsible and on client sites;
 - iv) how and where to obtain more information on health and safety management system procedures.

- 4.7.4 The second part of the induction, will include the following topics:
- a) Glenco's health and safety policy and procedures including:
 - i) first aid and accident reporting;
 - ii) display screen equipment;
 - iii) manual handling;
 - iv) hazardous substances;
 - v) electricity at work;
 - vi) working alone;
 - vii) smoking;
 - viii) off-site work;
 - b) also information on the following
 - i) fire and emergency procedures, including how to find:
 - the site & local evacuation procedures
 - the hazards and risks identified within the department and action to be taken
 - the location of the fire exit;
 - the assembly point;
 - the name and location of the local fire warden;
 - further instructions on the action to be taken in the event of discovering a fire;
 - fire alarm call points;
 - fire fighting equipment such as hose reels and extinguishers;
 - ii) bomb procedures where applicable on client sites & included in local emergency arrangements ;
 - iii) general safety comprising:
 - iv) identification of duty holders;
 - v) house keeping;
 - vi) safe storage of material & equipment;
 - vii) welfare facilities including:
 - viii) toilets and washrooms;
 - ix) catering arrangements, eating, drinking and vending facilities.
 - x) any other matter specific to the location

4.8 Consultation with Staff, Employees or Others

- 4.8.1 Glenco, in so far as is reasonably practicable, shall consult with all employees in good time on matters relating to their health and safety at work and in particular, with regard to:
- a) the introduction of any measures at the workplace which may substantially affect the health and safety of those employees;
 - b) Glenco's arrangements for:
 - i) appointing competent persons to assist in undertaking the measures Glenco needs to take to comply with the requirements and prohibitions imposed upon it by or under the relevant statutory provisions;
 - ii) appointing competent persons to implement procedures to be followed in the event of serious and imminent danger to persons at work on Glenco's premises;
 - c) any health and safety information Glenco is required to provide to those employees by or under the relevant statutory provisions;
 - d) the planning and organisation of any health and safety training they are required to provide to employees by or under the relevant statutory provisions;
 - e) the health and safety consequences for employees of the introduction of new technologies into the workplace.

4.9 Stress

- 4.9.1 Glenco acknowledges that all people encounter stress in their working and personal lives and are committed to managing work-related stressors as with any other health and safety risk. Through the risk assessment process, Glenco will continue to identify hazards and assess all mental and physical risks to health and safety with the objective of reducing them, as far as is reasonably practicable.
- 4.9.2 Any employee who considers they are suffering from excessive pressure or stress, for whatever reason, should inform their Supervisor or Manager in the first instance, who will treat the matter confidentially and who may, if appropriate, refer the person to the employee's doctor for a medical assessment or to an independent stress counselling service.

4.10 Staff or Employees who are New, Expectant or Nursing Mothers

- 4.10.1 Glenco, in so far as is reasonably practicable, shall:
- a) take all reasonable steps to safeguard the health, safety and welfare of new or expectant mothers, and of their unborn children;
 - b) assess all risks to new or expectant mothers arising from their work activities and to take appropriate preventive or control measures;
 - c) provide suitable rest facilities for any woman at work who is pregnant or nursing children

4.11 Electricity at Work

- 4.11.1 Glenco in so far as is reasonably practicable, shall:
- a) ensure that electrical installations and equipment are installed in accordance with the Institute of Electrical Engineers (IEE) Wiring Regulations, latest edition; where applicable.
 - b) maintain the fixed installations in a safe condition by carrying out routine safety testing; where applicable.
 - c) inspect and test portable and transportable equipment as often as is recommended by Glenco's risk assessment.
- 4.11.2 employees:
- a) must report all electrical faults, or faulty electrical equipment, immediately;
 - b) shall not use, or continue to use, faulty electrical equipment;
 - c) shall not carry out repairs, or work on electrical equipment, unless competent and authorised to do so;
 - d) shall not bring their own electrical equipment on to Glenco's or client's premises unless it has been tested by a competent person appointed by Glenco.

4.12 General Housekeeping

- 4.12.1 All work areas are to be kept clean and tidy and all tools not in use are to be stored away in their correct places so as not to prejudice the safety of either employees, other person working on Glenco's premises or any visitor or player.
- 4.12.2 No files, books or other objects should be left on floors or in any other location that may prejudice the safety of either employees or any other person working on Glenco's premises.
- 4.12.3 All cables shall be kept neat and tidy and not be permitted to trail across corridors, walkways or office areas unless suitable protection is provided.

4.13 Working Alone

4.13.1 Glenco in so far as is reasonably practicable, shall:

- a) ensure that all employees who are required to work alone for significant periods of time, are protected from risks to their health and safety;
- b) endeavour to remove the risks from working alone and, where this is not practicable, to reduce the risks to an acceptable level;
- c) ensure that employees of Glenco required to work alone for significant periods of time are given such information, instruction and training, as is necessary to enable them to recognise the hazards and appreciate the risks involved when working alone.

4.14 Risk Assessment

4.14.1 Glenco, in so far as is reasonably practicable, shall ensure:

- a) that suitable and sufficient assessment is made of the risks to the health and safety of:
 - i) employees whilst they are at work;
 - ii) persons not in their employment but arising out of or in connection with their work;

to allow Glenco to identify the measures needed to comply with the requirements of current statutory legislation;

- b) that all such assessments are reviewed periodically to ensure that where any significant changes have been made to the safe system of work are in line with statutory requirements;
- c) that sufficient competent persons are appointed to carry out any necessary assessments;
- d) that all employees, and in particular duty holders, are provided with sufficient information, instruction, and training as is necessary to enable them to comply with local risk assessment procedures.

4.15 Management of Contractors (where used or resources allocated)

4.15.1 Glenco, in so far as is reasonably practicable, shall:

- a) provide the employer of any employees from an outside undertaking, or any self-employed persons who are working on Glenco's premises or premises which has been placed under the control of Glenco with:
 - i) comprehensible information on any risks to those employees or self-employed persons health and safety, arising out of, or in connection with, the conduct of Glenco's undertaking;

- ii) comprehensible information on the measures that will be taken by that Company in compliance with the requirements and provisions imposed upon him or under the relevant statutory provisions insofar as the said requirements and prohibitions relate to those employees or self-employed person;
 - iii) sufficient information to enable them to identify any person nominated by Glenco to implement the evacuation procedures.
 - b) take all reasonable steps to ensure that any employees from an outside undertaking, or any self-employed persons who are working on Glenco's premises or premises which have been placed under the control of Glenco, receive sufficient information to enable them to identify any person nominated by Glenco to implement the evacuation procedures.
- 4.15.2 . Glenco, in so far as is reasonably practicable, shall:
- a) check that the company they propose to use as a sub contractor or to undertake work on their behalf is suitable and complies with the relevant health & safety legislation. This shall be by way of a pre-qualification questionnaire.
 - b) monitor the compliance of the contracted company on a regular basis to ensure that the said company is undertaking their work diligently and in compliance with the relevant health & safety legislation

4.16 Personal Protective Equipment (PPE)

- 4.16.1 Glenco, in so far as is reasonably practicable, shall ensure that any Personal Protective Equipment (PPE) identified as being required, within their risk assessments, will be suitable for the task and shall be issued free of charge to those employees identified as requiring the PPE.
- 4.16.2 Glenco shall also ensure that any employee issued with PPE is trained in the risks identified, the correct use of the PPE, storage and maintenance of the PPE and the methods of reporting any loss of damage to the PPE.
- 4.16.3 Every employee issued with PPE is responsible to insure the PPE within their care is used correctly and at the correct times, that it is maintained in a clean and useable state, that it is stored safely and that any defect, damage or loss is reported immediately to their supervisor / manager

4.17 Young Persons

- 4.17.1 Glenco, in so far as is reasonably practicable, shall ensure that young persons employed by the company, shall be protected at work from any risks to their health & safety which are a consequence of their lack of experience, or absence of awareness of existing or potential risks or the fact that young persons have not yet fully matured. Glenco shall ensure that:

- a) no young person shall be employed under the age of 18 years old.
- b) no young person shall be employed until a full risk assessment has been undertaken into the risks to the health & safety of the young person. This risk assessment shall cover;
 - i) the inexperience, lack of awareness and immaturity of the young person;
 - ii) the fitting out and layout of the workplace and or workstation;
 - iii) the nature, degree and duration of exposure to physical, biological and chemical agents;
 - iv) the form, range and use of work equipment and the way in which it is handled;
 - v) the organisation of processes and activities;
 - vi) the extent of the health & safety training provided or to be provided to the young person.

4.18 Alcohol and Drugs

- 4.18.1 The consumption or use of illegal drugs is forbidden during working hours or on Glenco's or Client Premises.
- 4.18.2 Any employee found to be using illegal drugs will be subject to disciplinary action as detailed within the staff handbook.
- 4.18.3 Any employee considered to be under the influence of alcohol or drugs at the commencement of or during their shift, will be subject to an internal investigation and possible disciplinary action.

4.19 Control of Substances Hazardous to Health - COSHH

- 4.19.1 Glenco, in so far as is reasonably practicable, shall
 - a) not carry on any work which is liable to expose any members of Glenco to any substance hazardous to health unless suitable and sufficient assessment has been made of:
 - i) the risks created by that work to the health of those members of staff;
 - ii) the steps that need to be taken to meet the requirements of current statutory legislation;
 - b) review and where necessary revise any assessments made if:
 - i) there is reason to suspect that the assessment is no longer valid; or
 - ii) there has been a significant change to the work to which the assessment relates;
 - c) ensure that the exposure of members of staff to substances hazardous to health is either prevented or, where this is not reasonably practicable, adequately controlled;

- d) provide sufficient information, instruction and training necessary to:
 - i) ensure the health and safety of all members of staff carrying out work that is liable to expose them to any substance hazardous to health.
 - ii) enable, Managers, and Supervisors to implement this policy.

4.20 Working at Height

4.20.1 Glenco, in so far as is reasonably practicable, shall ensure that prior to any working at height being authorised, the Director Responsible for Health & Safety or his nominated representative shall:

- a) assess the risk to help decide how the work can be undertaken safely;
- b) follow the hierarchy for safe work at height which is:
 - i) avoid;
 - ii) prevent;
 - iii) mitigate;and give collective measures priority;
- c) plan and organize the work properly taking into account the weather conditions and the possibility of emergencies;
- d) ensure those working at heights are competent;
- e) manage the risks from working equipment to be used and inspect the place where the work is to be carried out (including access and egress).

4.20.2 All employees shall:

- a) ensure that they inform their Line Director / Manager of any medical conditions which may affect their ability to work at heights safely;
- b) use the equipment provided by Glenco safely and in accordance with any instructions and training given, and not to tamper with or modify the equipment;
- c) take positive steps to understand the hazards in the work place and to comply with safety rules and procedures.

4.21 Asbestos

4.21.1 Glenco shall, in so far as is reasonably practicable, ensure that they shall

- a) take reasonable steps to ensure the locations of materials likely to contain Asbestos Containing Materials & Asbestos Insulating Boards (ACM's & AIB's) have been identified within structures or areas demised to Glenco, by the nominated competent person.
- b) assume that the identified materials contain asbestos, unless there is evidence to the contrary
- c) ensure that the client or nominated duty holder has kept an up to date written record (Asbestos Register) of the locations of the ACM's
- d) regularly monitor the work area condition containing ACM's
- e) make a written risk assessment of the risks of exposure from asbestos

4.22 Driving and Mobile Phones

- 4.22.1 As part of our overall health and safety policy, Glenco is committed to reducing the risks, when driving or riding for work. We ask all our staff to play their part, whether they use a company vehicle, their own or a hire vehicle. As such Staff driving for work must never make or receive calls on a mobile phone, whether hand-held or hands-free, while driving. Persistent failure to do so will be regarded as a serious matter.

5.0 RESPONSIBILITIES

5.1 The Directors.

- 5.1.1 Are responsible for ensuring that Glenco complies with the requirements of:
 - a) the Health and Safety at Work Act 1974 and the relevant statutory provisions;
 - b) all relevant fire safety legislation;
 - c) this policy; and
 - d) all procedures that comprise Glenco Health and Safety Management system.
- 5.1.2 Shall ensure that the necessary resources are made available to comply with the above stated requirements.
- 5.1.3 Have appointed a Director as the Director responsible for Health, Safety and Fire in all areas within which Glenco operate.
- 5.1.4 Shall ensure that this policy is reviewed annually and in the light of any failure of the system and/or changes in statutory legislation.
- 5.1.5 Shall ensure that adequate resources are made available to implement this policy and carry out any necessary remedial action or amendments to this policy.
- 5.1.6 Shall appoint where ever necessary a competent specialist to assist Glenco Directors and management responsible for Health & Safety in the development and implementation of the Glenco Health & Safety management system.
- 5.1.7 Shall ensure that all procedures that comprise Glenco Health and Safety Management system are implemented.
- 5.1.8 Shall ensure that adequate resources are made available to implement these procedures and shall take any necessary remedial action or make any necessary amendments to the procedures that comprise Glenco Health and Safety Management system.

5.2 The Director Responsible for Health & Safety

- 5.2.1 Is the nominated Director responsible for Health & Safety and is responsible for ensuring that Glenco complies with the requirements of:
- a) the Health and Safety at Work Act 1974 and the relevant statutory provisions;
 - b) all relevant fire safety legislation;
 - c) this policy; and
 - d) all procedures that comprise Glenco Health and Safety Management system.
- 5.2.2 Shall manage and monitor the day-to-day compliance with the above stated requirements.
- 5.2.3 Shall ensure that adequate resources are made available to comply with the above stated requirements and to implement these procedures and shall take any necessary remedial action or make any necessary amendments to the procedures that comprise Glenco's Health and Safety Management system.
- 5.2.4 Shall ensure that all employees are provided with such information, instruction and training as is necessary to allow them to comply with the above stated requirements.
- 5.2.5 Shall ensure that all procedures that comprise Glenco's Health and Safety Management system are implemented.
- 5.2.6 Shall review this policy annually and in the light of any failure of the system and/or changes in statutory legislation, and ensure that any recommended changes are made to the policy documentation.
- 5.2.7 Has appointed Health & Safety Co-ordinator to plan, manage and monitor the company's compliance with this policy.
- 5.2.8 Shall appoint an External Consultant when necessary or required to assist the Health & Safety Co-ordinator to plan Glenco's implementation and to assist him in monitoring compliance with this policy.
- 5.2.9 Shall ensure that:
- a) the effectiveness of this policy and all procedures that comprise Glenco's Health and Safety Management system are reviewed regularly and in the light of any failure of the system and/or changes in statutory legislation;
 - b) any recommended actions and/or changes are recorded and reported to the Managing Director and to the Health & Safety Consultant
 - c) all recommended actions and/or changes that are approved by the Managing Director are implemented.
- 5.2.10 Shall ensure that all accidents, incidents, fires and unplanned evacuations within the Company's estate are investigated to determine the cause, and shall report in writing to the Director responsible for Health & Safety detailing any findings and any recommended remedial action that may be taken to prevent a recurrence.

5.3 The Health & Safety Co-ordinator

- 5.3.1 is Glenco's nominated person under the Management of Health and Safety at Work Regulations;
- 5.3.2 shall plan and monitor the Company's compliance with:
- a) the Health and Safety at Work Act 1974 and the relevant statutory provisions;
 - b) all relevant fire safety legislation;
 - c) this policy; and
 - d) all procedures that comprise Glenco's Health and Safety Management system
- 5.3.3 Shall manage and monitor compliance in the Company with the above stated requirements.
- 5.3.4 Shall, when requested, ensure that all employees of Glenco with responsibility for managing or monitoring health and safety are provided with such information as is necessary to allow them to comply with the duties imposed upon them by:
- a) the Health and Safety at Work Act 1974 and the relevant statutory provision
 - b) this policy.
- 5.3.5 Shall ensure that:
- a) the effectiveness of this policy and all procedures that comprise Glenco's Health and Safety Management system are reviewed annually and in the light of any failure of the system and/or changes in statutory legislation;
 - b) any recommended actions and/or changes are recorded and reported to the Director responsible for Health & Safety; and
 - c) all recommended actions and/or changes that are approved by the Director responsible for Health & Safety are implemented.
- 5.3.6 Shall ensure that all accidents, incidents, fires and unplanned evacuations are investigated to determine the cause, and shall report in writing to the Director responsible for Health & Safety detailing any findings and any recommended remedial action that may be taken to prevent a recurrence.
- 5.3.7 Shall ensure that all accidents, work related illnesses and dangerous occurrences reported by anyone working for, or on behalf of, Seiko UK, that are reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995, are reported to the relevant authority in accordance with the requirements of the aforementioned Regulations.
- 5.3.8 Shall produce periodic and annual accident and incident statistics for Glenco and send a copy to:
- a) the Director responsible for Health and Safety
 - b) the Health & Safety Committee

5.4 The Health & Safety Consultant

- 5.4.1 Has been nominated by the Director responsible for Health & Safety as Glenco competent person under the Management of Health and Safety at Work Regulations 1999 for all Health & Safety Strategic matters.
- 5.4.2 Shall plan, advise and monitor Glenco strategic compliance with:
 - a) the Health and Safety at Work etc. Act 1974 and the relevant statutory provisions;
 - b) all relevant fire safety legislation;
 - c) this policy; and
 - d) all procedures that comprise Glenco Health and Safety Management system
- 5.4.3 Shall, when requested, ensure that employees with responsibility for managing or monitoring health and safety are provided with such information as is necessary to allow them to comply with the duties imposed upon them by:
 - a) the Health and Safety at Work etc. Act 1974 and the relevant statutory provisions
 - b) this policy.
- 5.4.4 Shall ensure that:
 - a) the effectiveness of this policy and all procedures that comprise Glenco Health and Safety Management system are reviewed annually and in the light of any failure of the system and/or changes in statutory legislation;
 - b) any recommended actions and/or changes are recorded and reported to the Director responsible for Health & Safety; and
 - c) all recommended actions and/or changes that are approved by the Director responsible for Health & Safety are implemented.

5.5 Directors, Managers and Supervisors

- 5.5.1 Shall ensure that they and their staff understand the requirements of both this policy and the relevant sections of the Company's Health and Safety Management system and shall ensure that they are implemented.
- 5.5.2 Shall ensure that all work under their control is adequately supervised and conducted safely, irrespective of whether the work is performed on or off Glenco's premises.
- 5.5.3 Shall take immediate and appropriate steps to assess and control risks to health and safety arising from work activity under their control.
- 5.5.4 Shall monitor the workplace to ensure that safe conditions are maintained.
- 5.5.5 Shall ensure that contractors working under their control and visitors are made aware of all relevant safety procedures.
- 5.5.6 Shall ensure that all employees under their control are aware of their duties relating to health and safety at work and receive adequate information, instruction and training to carry out their work.
- 5.5.7 Are responsible for the management and monitoring of risk assessment within their areas.
- 5.5.8 Are responsible for the appointment and training of duty holders and the maintenance of a list of duty holders for their area.
- 5.5.9 Shall alert senior management promptly to any health and safety issue that requires their attention.

5.6 Employees

- 5.6.1 Shall take reasonable care for their own health and safety.
- 5.6.2 Shall consider the safety of other persons who may be affected by their acts or omissions (through what they do or do not do).
- 5.6.3 Shall work in accordance with information and training provided.
- 5.6.4 Shall refrain from intentionally misusing or recklessly interfering with anything that has been provided for health and safety reasons.
- 5.6.5 Shall report any hazardous defects in plant and equipment, or shortcomings in the existing safety arrangements to a responsible person without delay.
- 5.6.6 Shall not undertake any task for which authorisation and/or training have not been given.

APPENDIX B ORGANIZATIONAL H&S STRUCTURE

Under review for final quarter 2012