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Apogee Corporation Limited

Health and Safety Policy

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HEALTH & SAFETY POLICY STATEMENT

The Apogee Corporation recognises and accepts its obligations under the Health & Safety at Work etc Act 1974 and from the relevant legislation relating thereto. We will ensure that our buildings, facilities, systems and equipment are designed and maintained to provide a safe and secure environment, so far as is reasonably practicable, for:

- Staff
- Customers
- Contractors working on site
- Other visitors

We will also ensure that whilst delivering, installing or servicing at our clients' premises we will:

- Respect our customers' own Health & Safety (H&S) policies and guidelines
- Operate good Health & Safety practice whilst on site
- Ensure that we do not compromise our clients Health & Safety, nor that of their other contractors or visitors

Procedures for ensuring compliance are outlined in the Policy and Procedure Guide which is available to each member of staff. Contractors and other visitors to our premises will also be made aware of any procedures and safety information which may affect them. In particular, the Apogee Corporation will, so far as is reasonably practicable:

- provide adequate control of the health and safety risks arising from our work activities;
- consult with our employees on matters affecting their health and safety;
- maintain our buildings, facilities and equipment in good repair;
- ensure safe moving, handling and lifting in accordance with best practice;
- provide information, instruction and supervision for employees;
- ensure all employees are competent to do their tasks, and give them adequate training to do so;
- prevent accidents and cases of work-related ill health;
- provide adequate welfare facilities and monitor stress;
- maintain safe and healthy working conditions;
- review and revise the H&S policy at regular intervals;

Barry Ferdinand, Joint Chief Executive, accepts ultimate responsibility for Health & Safety (H&S) throughout our sites. He fully supports the implementation of the H&S Policy and Procedure Guide and will provide, as far as is reasonably practicable, the necessary support and resources to comply with its provisions and the monitoring, auditing and review thereof.

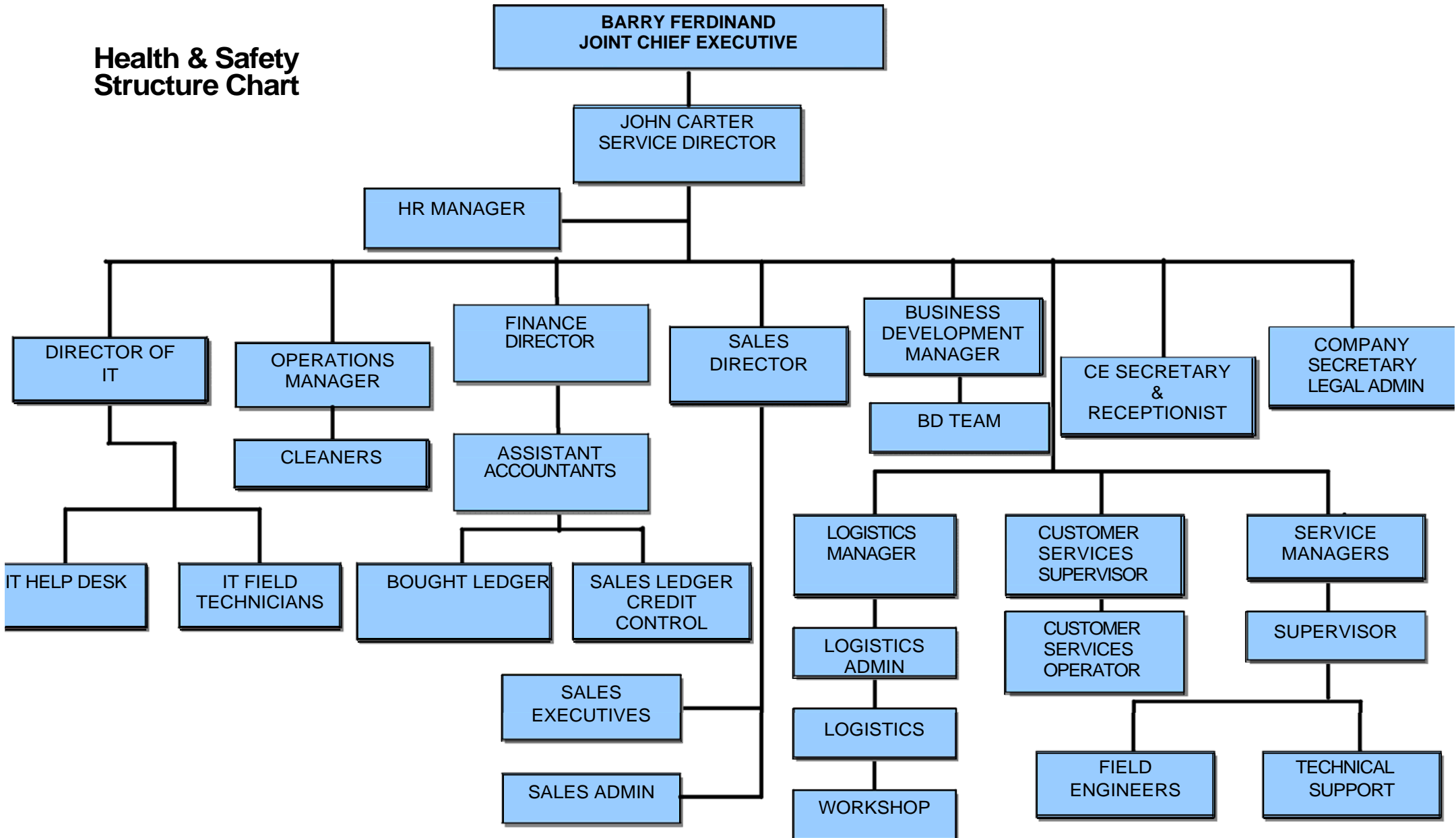
Signed

A handwritten signature in black ink, consisting of a large, stylized 'B' with a vertical line through it, all enclosed within a horizontal oval shape.

Barry Ferdinand
Joint Chief Executive

Date 01/09/2008

Health & Safety Structure Chart



ORGANISATIONAL ARRANGEMENTS AND RESPONSIBILITIES

These are set down below to ensure that everyone understands their own and each other's responsibilities for H&S throughout the organisation.

H&S is included in induction training when new staff commence employment and a copy of this document is issued to them. They will be given the opportunity to raise concerns and comments with their line Manager, the HR Manager and/or with the Service Director. This document will be regularly reviewed and discussed at appraisals thereafter.

Joint Chief Executives' responsibilities

- *Accepts overall and final responsibility for H&S throughout the organisation.*
- *Receives the findings of the risk assessments carried out, prioritises responsibilities and allocates the necessary resources to remove or reduce the risk and ensures that all necessary actions are carried out.*
- *Ensures that the H&S Law Poster is displayed.*

Whilst Barry Ferdinand takes the lead on H&S, Jason Collins, as Joint Chief Executive, will cover this role in his absence, assisted by the Service Director, John Carter.

Service Director's responsibilities

- *Ensures the H&S Policy is put into practice throughout the organisation..*
- *Consults with managers on matters affecting H&S and provides information, instruction and supervision for managers.*
- *Maintains the building and it's equipment and facilities, ensuring that effective maintenance procedures are drawn up and that maintenance work is implemented. Receives repair requests and concerns from staff. Carries out regular inspections of the building.*
- *Maintains safe and healthy working conditions to prevent accidents or ill-health.*
- *Ensures that H&S is an agenda item at all monthly regional meetings, team meetings and appraisals, and that action is taken in respect of any matters arising there from.*
- *Ensures that the H&S policy is reviewed as necessary at regular intervals (at least annually) or whenever there is a major change.*
- *Provides and monitors training to ensure that staff are competent to do their tasks. This training will cover both induction and job-specific issues. Maintains records of all training given.*
- *Co-ordinates recruitment of staff and monitors staff illness in case of work-related ill health.*
- *Undertakes risk assessments, reporting the findings to the Directors and ensures that the results of risk assessments are communicated to staff.*
- *Reviews risk assessments at least annually or whenever a major change occurs or if the work activity changes.*

- . *Ensures that on site work will meet any H&S policies and standards notified by individual clients.*
- . *Ensures that new contractors have satisfactory H&S policies and arrangements in place and are made aware of Apogee's H&S requirements.*
- . *Checks that new equipment meets H&S standards before procurement.*
- . *Identifies which substances require a COSHH assessment and undertakes these assessments in conjunction with the relevant Director/Manager, also checking potential new substances before procurement.*
- . *Undertakes and monitors the supervision of young workers/trainees.*
- . *Provides H&S advice to directors/managers.*
- . *Appoints and organises training for various staff to act as first aiders, appointed persons and fire marshals (these duties will be added to the job description), ensuring that there is sufficient provision to allow for holidays, sickness etc.*
- . *Maintains the Accident Book and takes responsibility for reporting accidents, diseases and dangerous occurrences to the enforcing authority under RIDDOR.*
- . *Ensures that the fire risk assessment is undertaken, implemented and reviewed at least annually.*
- . *Organises fire drills at 6 monthly intervals and maintains a record of same.*
- . *Checks escape routes, fire extinguishers and alarms at the required intervals.*
- . *Ensures that arrangements are enforced for security of the building out of hours.*
- . *Ensures that PPE is provided and is correctly used and that replacements are available..*

Actions any communication from suppliers on safety issues.

- . *Receives reports from staff on H&S concerns.*

During the Service Directors' absence, cover will be provided by the Joint Chief Executives, with the assistance of the HR Manager.

Directors/Managers

Directors/Managers are expected to:

- . *Liaise with the Service Director on all matters affecting H&S (and in his absence, with one of the Joint Chief Executives).*
- . *Communicate the results of risk assessments to staff and also to communicate other H&S issues/guidance to staff in a clear manner.*

- . Regularly monitor the work operation to ensure that good H&S practice and guidance is being put into practice, and that PPE is being worn.
- . Ensure that staff are trained to use equipment safely and correctly and in how to carry out their tasks with regard to good H&S practice (training requests to be submitted through the Service Director).
- . Ensure that the workplace is maintained in an efficient, tidy and safe manner.
- . Ensure that doors and windows in their working area are closed at the end of the day.

Directors/Managers with any specific H&S responsibilities (eg vehicles) must ensure that during periods of absence these responsibilities are covered by liaising with the Service Director.

Employees

All employees are expected to:-

- . Read the H&S policy and discuss this with their line manager and/or the Service Director, raising queries on any point they do not understand and/or any concern they may have relating thereto.
- . Follow any instruction/good advice contained within the above and/or which has been communicated to them by any means.
- . Co-operate with directors, managers and supervisors on H&S matters.
- . Not to interfere or tamper with any item provided to safeguard Health & Safety as it is illegal to do so.
- . Ensure that accidents or near-misses are reported to the Service Director, whether they result in injury/damage or not, and to ensure that these are entered in the accident book and are signed by both the employee and their line manager..
- . Report any work-related health problems to their line manager immediately.
- . Use equipment safely and correctly.
- . Wear any Personal Protective Equipment (PPE) provided, keep it in good condition and store it correctly, advising their line manager when replacements are needed.
- . Report all H&S concerns or hazards to an appropriate person (ie their line manager, the Service Director or in their absence, to one of the directors of the company).
- . Take reasonable care of their own and other's Health & Safety.
- . Report any potential hazards to their manager and/or the Service Director.

Appointment of Competent Persons in respect of H&S Issues

Most day-to-day H&S issues can be covered by the arrangements and persons set down in this document. Where more detailed knowledge or expertise is required assistance is obtained from an external H&S consultancy, Access 21 Ltd.

Competency for Tasks and Training

Apogee will ensure that staff are recruited who are capable and fit for the proposed job (within the spirit of the Disability Discrimination Act) and will ensure that any training (whether on-site or external) is provided.

Refresher training must be provided at the appropriate intervals.

Training records will be kept on file by the HR Manager.

Consultation and Communication

Legislation: Health and Safety (Consultation with Employees) Regulation 1996

Under these regulations, employers are required to demonstrate that they consult with staff over H&S. Apogee believe that good communication is vital to maintain good H&S awareness and practice throughout the company, so the directors will ensure that efficient two-way communication systems are in place.

H&S will be included at regular board meetings, team meetings and briefings and will include field-based and sales staff in addition to workplace staff.

H&S is included in induction training for all new staff.

Letters will be sent to clients explaining Apogee's concern for the H&S of their staff and seeking advice from them on any specific H&S instruction that the client requires our staff to comply with and the identification of any specific hazards on site which our staff need to be made aware of.

Contractors working for Apogee will be similarly advised of our own H&S requirements and of any specific hazards on site.

A short guidance note on H&S will be displayed at Reception for our visitors and consideration is being given to including a short guidance note on the TV screen sited there.

Risk Assessment and Monitoring

Legislation: The Management of Health & Safety at Work Regulations 1999

Detailed risk assessments have been carried out in respect of a range of issues including the building, fire, COSHH, manual handling, services, equipment (including display screens) and specific tasks.

Copies of these assessments are available from the Service Director on request.

Special risk assessments will be carried out in respect of workers who are pregnant, new mothers or who are under the age of 18. Action will be taken in respect of any issues identified and in the case of the latter, careful supervision and training will be given. These risk assessments must be documented and reviewed regularly.

The results of risk assessments will be communicated to staff, and actions required will be prioritised on the basis of greatest risk with control measures implemented to remove or reduce the risk.

General risk assessments will be regularly monitored and reviewed annually or whenever a major change is implemented, whichever is soonest.

To check our working conditions, and ensure our working practices are being followed, monitoring will be carried out as follows:-

- Managers and/or the Service Director will inspect the workplace at regular intervals and will occasionally accompany staff on deliveries and maintenance visits.
- Any concerns identified by staff will be investigated and any necessary action taken to reduce the risk. This may mean making adjustments to the temperature, noise levels, ventilation and layout of the office and/or to equipment and/or to procedures and systems.
- Investigate any accidents that occur within the office or on site and take action to prevent recurrence.
- Investigate employee absenteeism to establish whether this is work-related and take relevant action if so.
- Check that H&S responsibilities are being discharged properly.
- Check employee's awareness of H&S issues at regular intervals (ie at team meetings, appraisals and/or during inspections).

Accidents, First Aid and Work-related Ill Health

*Legislation: Health & Safety (First Aid) Regulations 1981
RIDDOR 95*

The company will make every effort to avoid accidents and stress in the workplace and/or ill-health resulting from work activities. Major factors in this are:

- Risk Assessments
- Maintaining a good H&S culture throughout the organisation.
- Ensuring the building and its facilities are safe and in good condition

The following arrangements are in place to cover any accidents that may occur:

- First Aid Kits are provided and equipped to appropriate levels. These will be regularly checked and replenished.
- The appointed person is the Service Director who also keeps the accident book for recording all accidents and cases of work-related ill health.
- First Aiders will be trained and appointed for each site.
- The Service Director will report any incidents under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) to the enforcing authority.

Personal Protective Equipment (PPE)

Legislation: Personal Protective Equipment Regulations 2002

Where risk assessment has shown that PPE is necessary the relevant items will be provided by Apogee with replacements issued as necessary.

Employees must wear the PPE provided for their own protection. They must also store, maintain and clean such items as appropriate, and request replacements when they become damaged or worn. If an item of PPE is not provided or is damaged, the employee must not continue the task without it.

Examples of PPE are steel-capped boots for warehouse staff, gloves/anti-stat strips for engineers etc, although various other items of PPE are provided across the organisation.

Health, Safety and Welfare

Legislation: The Workplace (Health, Safety and Welfare) Regulations 1992

The workplace and it's facilities and equipment will be maintained to provide a comfortable and safe environment for staff, visitors, contractors and anyone else who may enter the premises.

Comfortable working temperatures, adequate lighting and ventilation is provided to our offices, along with adequate toilet and refreshment facilities.

On external sites, employees must ensure that they consult with the client about any specific H&S concerns which may affect them, or if there is any specific H&S instruction they must comply with.

Any H&S concern on-site which the client does not address must be notified to your line manager and/or to the Service Director and work discontinued until advice is given.

Equipment

Legislation: The Provision & Use of Work Equipment Regulations 1998 (as amended)

The Service Director is responsible for identifying all equipment and facilities needing maintenance, and for ensuring that effective maintenance procedures are drawn up and for implementation.

The Service Director will check before purchase that new items of equipment meet current H&S standards.

Equipment must be correctly and safely sited and used in accordance with the manufacturer's instructions.

Staff must not use equipment for which they have not been thoroughly and correctly trained, nor if an item of equipment is faulty. Should a member of staff discover a fault they must advise

their manager or the Service Director immediately and ensure that the item is taken out of use until it has been repaired by a competent engineer.

Electricity

*Legislation: Electricity at Work Regulations 1988 (as amended)
The Low Voltage Electrical Equipment (Safety) Regulations 1988.*

The mains electrical system at our sites will be checked by a competent engineer at least every 5 years and a certificate retained by the Service Director.

Portable appliances will generally be checked annually. A note will be kept on file of all these checks and be signed by the engineer responsible for carrying them out.

Staff must check flexes, plugs and sockets each time before use to ensure there is no visible sign of danger (eg frayed wires, damaged cable etc).

Fire

Legislation: Fire Precautions Act 1971 and Fire Precautions (Workplaces) (Amendment) Regulations 1999 (as amended)

The main sources of ignition for our offices are:-

- > Arson
- > Equipment (sparks or overheating)
- > Hot Surfaces
- > Naked Flames
- > Smoking

Combustible materials include:

- > Paper
- > Fabric of building (eg carpets and wall coverings)
- > Oil
- > Chemicals.

Fire risk assessments will be carried out and be documented. These will be reviewed at regular intervals.

Staff are made aware of the dangers from fire and therefore fuel, oxygen and heat sources are controlled to avoid the elements of the "Fire Triangle" coming together. Equipment is regularly maintained

Staff are aware of the procedure to take if they discover a fire or if the alarm is given. Evacuation routes are clearly marked and an Assembly Point nominated. Fire drills are held every 6 months and a record is maintained of these.

Fire Marshalls will be appointed and trained and will oversee safe evacuation of the premises in the event of a fire drill or a real fire.

Fire fighting equipment will be checked annually, contracts are also in place for the regular maintenance of fire alarm equipment and emergency lighting at the intervals recommended by the manufacturers.

A Fire Assembly Point has been designated at the fencing of the car park away from the immediate vicinity of the building. A sign will be produced to clearly mark this facility and staff will be made aware of where to assemble.

Fire routes, both internal and external, must be kept clear at all times. Fire doors must always be unlocked whenever anyone is working on the premises.

Safe Handling and Use of Substances

Legislation: Control of Substances Hazardous to Health Regulations 2002 (COSHH)

Service managers, under the responsibility of the Service Director, will identify substances which need a COSHH assessment and will be responsible for carrying this out and for informing staff of the results of the assessment. They will also identify, before purchase, that new substances can be used safely. Every effort will be made to reduce hazardous substances to the minimum by seeking safer alternatives where available and by standardising products as far as possible across the sites.

Assessments will be reviewed annually or whenever new substances are introduced, or whenever updated Safety Data Sheets are issued, whichever is the soonest.

Safety Data Sheets will be retained on file with copies clearly displayed. Summaries of the main points will be given to engineers and workplace staff.

Working with Display Screen Equipment (DSE)

Legislation: Health and Safety (Display Screen Equipment) Regulations 1992 (as amended)

Staff are advised of the risks that can be caused by DSE equipment as follows:-

- Eyestrain
- Headaches
- Upper Limb Disorders
- Backache

Risk assessments have been carried out where necessary and any comfort aids and new furniture needed have been supplied.

To reduce the risk, users are advised:-

- To maintain a good posture, sitting at the correct height with forearms parallel to the surface, adjusting the chair height and tilt to give you the best support and by also adjusting the screen height and angle.
- Ensure the top of the screen is approx level with the eyes and to momentarily glance into the distance every few minutes.
- Take breaks from the VDU after 50 minutes of continuous use and have a change of task (eg telephone calls, filing, making a drink, using the toilet etc).

- › Position keyboard and mouse sensibly to avoid stretching or other awkward movements.
- › Avoid glare or reflections on the screen, and keep the screen clean and free from flicker.
- › Adjust brightness and contrast controls.
- › VDU users are entitled to eye tests provided by the company and an allowance towards the cost of corrective lenses where a prescription shows these are required for VDU use.

Report any problems immediately to your manager or to the Service Director, particularly if these are affecting your health.

Manual Handling/Moving & Handling

Legislation: Manual Handling Regulations 1992 (as amended)

Manual Handling includes lifting, carrying, bending, stretching.

Risk Assessments are carried out on all manual handling operations. However staff are advised that care must always be taken and to follow the following guidance:-

- › Consider if the item really needs to be moved at all and if there is any aid to assist (eg trolley, lift).
- › Before moving an item consider the following:
 - Load (shape, size, weight, stability and nature)
 - Individual (your fitness and ability to move it)
 - Task (how and where it is to be moved to?)
 - Environment (are there any hazards, obstructions or obstacles such as slippery floors or stairs that may cause a problem?).
- › Plan your route to overcome any obstacles or obstructions
- › Do you need assistance?
- › Wear PPE where appropriate.
- › Carry items close to your body so that you have more control over them
- › Bend at the knees slowly keeping your back straight
- › Raise the load to waist height, move the load and reverse the procedure to lower it.
- › Where equipment (eg fork lift trucks and pallet trucks) are used then clearly marked pedestrian walkways must be maintained at all times.

Posters on best manual handling practice are displayed around the organisation.

Asbestos

Legislation: Control of Asbestos at Work Regulations 2006

The Directors are not aware of any asbestos within the building, but should there be reason to doubt this then a specialist survey will be commissioned and the results actioned in compliance with the regulations.

Driving

Drivers must ensure that they keep their vehicles (whether company vehicles or own vehicles used for business purposes) in a safe and roadworthy condition.

You must not drive if:

- › You are feeling unwell or excessively stressed
- › You are under the influence of alcohol or drugs
- › You have been banned
- › You do not have road tax, insurance or current MOT
- › If you require spectacles for driving and these are not available.
- › If you have been advised not to drive.

Always carry a portable first aid kit, blanket, water and some emergency food rations (eg biscuits, chocolate etc) in case of breakdown.

Do not eat, drink or read whilst driving and ensure your full attention is given to your driving and to other road users and pedestrians.

Smoking

In accordance with current legislation all of Apogee's premises and their environs are designated as non-smoking.

Staff must not smoke on our clients' premises or their environs.

Staff must not smoke in company vehicles.

Lone Working

Lone working will be avoided wherever possible, but in some cases where this is unavoidable (eg Telephone Installation Operative, cleaners and similar), risk assessments must be carried out and documented and be reviewed at regular intervals.

Control measures must be put in place to reduce this risk to the lowest level.

Working at Heights

Where this is unavoidable, risk assessments must be undertaken and control measures put in place to reduce this risk to the lowest level. These assessments must be documented and regularly reviewed.

Staff must be advised of safety precautions they can take, be trained in all aspects of the work, equipment to be used and in how to use ladders safely.

Working Time Directives

Staff must work within the recommendations of the Working Time Directive – for further information on this aspect please contact the HR Manager.

Stress

The company has a responsibility to monitor and reduce stress levels within the organisation.

Employees can help to reduce stress by: -

- › Effective team working and co-operation
- › Planning their work to avoid stress and repetition
- › Maintaining general fitness
- › Using relaxation techniques

If you feel that you are suffering from stress caused by the workplace please discuss this with your line manager as soon as possible so that preventative measures can be taken.

Violence

Apogee staff should be able to go about their work without fear of violence. If an incident does occur whether this is on company premises, clients' premises or during travel between sites please let your line manager and the Service Director know as soon as possible.

It is important that the building is kept secure and that all staff are vigilant about possible intruders.

Remember, Health & Safety is everyone's responsibility.

If you have any query or concern on any aspect of this policy please speak to your Manager and/or to the Service Director.