

**NCES Ltd**  
**Health and Safety Policy**

**1. General Statement of Policy on Health and Safety at Work**

It is the policy of NCES Ltd to develop a positive health and safety culture throughout the organisation because we believe that high health and safety standards are a pre-requisite in the pursuit of company efficiency and competitiveness.

To achieve this, the Company will progressively identify all workplace hazards and take appropriate measures to eliminate or control risks to employees and others affected by our operations by applying positive control standards and provision of information, training and supervision as needed.

Employees are reminded that they have a duty to ensure that the Company's Health and Safety Policy is observed and in particular they are required:-

- To take reasonable care for their own health and safety at work and of those who may be affected their actions, or by their omissions.
- To co-operate with their employer to ensure that any duty, or requirement, for health and safety imposed upon their employer by law is performed or complied with.
- Not to intentionally, or recklessly, interfere with or misuse anything provided in the interests of health, safety or welfare.
- To report to supervisory staff hazardous conditions or defects in the company safety arrangements.

The company recognises that it has the ultimate legal responsibility for health and safety. Accordingly the Managing Director accepts overall responsibility for policy formulation and implementation. In turn, all levels of management and all supervisors are responsible for carrying out those health and safety duties placed on them. The Managing Director will ensure that the safety plan includes sufficient resources for the successful implementation of the Health and Safety Management Policy.

Where appropriate, the monitoring and review of the Company's Health and Safety Management Policy will be carried out by the Health and Safety Management Committee under the direction of the director responsible for health and safety within the Group who will be appointed from time to time by the Managing Director.

Development of the Health and Safety Management Policy will be conducted through the normal business meetings where health and safety will be given standing equal to other activities of the business.

The company will appoint a number of competent persons to assist the company directors implement this policy. The Safety Officer's role is to provide independent and authoritative advice to managers with individual responsibilities for health and safety.

For NCES Ltd



Neil Coulter

Managing Director  
04<sup>th</sup> May 2010

## 2. Health and Safety Responsibilities and Authority

### 2.1 Introduction

The ultimate responsibility for safety and health is vested in the senior management of the Company. The Managing Director will have the overall responsibility for the implementation of the Company Health and Safety Policy.

Each Manager and Foreman (referred to in this Safety Policy as Heads of Department) will be responsible for the maintenance of safe and healthy working conditions in the area, process or function over which he exercises control. He will further be responsible for ensuring that the necessary actions are taken to maintain plant and equipment in a safe and healthy condition. He is also required to report any circumstance where this cannot be achieved to his Superior without delay.

Each charge hand and supervisor (referred to in this Health and Safety Policy as Supervision) will assist the Head of Department by fulfilling the responsibilities allocated in the policy.

Every person employed has legal responsibilities, which are covered in their health and safety training. All requests, suggestions or complaints concerning matters of health and safety must, in the first instance, be referred to the employee's immediate Superior who will decide the appropriate course of action.

The Organisation and Reporting Structure for the management of health and safety is the same as for all other aspects of business, as shown on the organisation charts posted in all workplaces. In order to ensure the effective management of health and safety at work, the following specific responsibilities and authorities are allocated.

#### 2.1.1 Managing Director – Neil Coulter

- Overall responsibility for the implementation of the Health and Safety Policy and monitoring its effectiveness.
- Liaison with his fellow Directors and Enforcing Authorities, as necessary, to ensure that adequate resources are allocated to Health and Safety at Work.
- Ultimate authority for approval of policy, organisation and arrangements.

#### 2.1.2 Location Manager – Neil Coulter

- To bring the Health and Safety Policy to the notice of employees within those areas for which he has specific responsibility and to ensure that the policy is kept up to date.
- To monitor safety performance, review the safety organisation, to allocate safety responsibilities and to appoint persons under Regulation 6 of the Management of Health and Safety at Work regulations.
- To liaise with Enforcing Authorities, including HM Factory Inspectors, Environmental Health Officers, Fire Prevention Officers and the Company Safety Officer or Health and Safety Consultant.
- To receive reports from Heads of Department on all matters relevant to Health and Safety at Work that cannot be resolved locally.
- To act as Chairman of the Safety Committee or other consultative committee as may be in existence.
- To keep up to date with legislation as advised by the Company Safety Officer or Health and Safety Consultant and to ensure, through Heads of Departments, that new plant, machinery and processes are in accordance with legal requirements.
- Authority to interpret this policy in accordance with general policy statement where specific issues are not covered.

### 2.1.3 Works Engineer – Neil Coulter

- To devise and implement procedures to ensure safety during maintenance activities.
- To have overall responsibility for fire safety at work, including organising fire drills, organising the testing of the Fire Alarm, checking fire extinguishers and ensuring compliance with the Fire Certificate.
- To be responsible for the premises, building services, cooling towers, Forklift Trucks, air receivers etc. and to ensure that all statutory records are completed and liaise with Engineer Surveyors from Insurance Companies, as necessary.
- To act as an appointed Competent Person under Regulation 6 of the Management of Health and Safety at Work Regulations by providing relevant technical information and opinion to the Location Manager and the Safety Officer.
- To have overall responsibility for the safety of contractors on site and to ensure that all contractors obey site safety rules.
- To ensure that assessments of all hazards and risks associated with buildings and premises have been undertaken and are adequately recorded – and to ensure that adequate Control Measures are in place.
- Authority to interpret this policy in accordance with the opening general policy statement where specific issues are not covered.

### 2.1.4 Heads of Department – Neil Coulter

- To ensure that suitable and sufficient Risk Assessments of all hazards and risks within his department have been undertaken and recorded. This will include consultation with the Works Engineer and Safety Officer as necessary.
- To ensure that employees in the area for which they are responsible are aware of safety standards and follow the safety rules and established systems of work.
- To ensure that satisfactory standards of housekeeping and storage are maintained, by undertaking routine checklist Safety Inspections.
- To ensure proper control of fire matters, including setting standards for the correct storage and use of highly flammable liquids and other flammable and/or combustible materials.
- To ensure that the accident and first aid treatment records are kept up to date and that accidents are investigated in accordance with established procedures.
- To ensure that adequate records of issue of Personal Protective Equipment are kept, together with associated training records.
- To receive comments from employees on health and safety matters and to refer items to the Works Engineer for corrective action to be taken.
- To ensure that correct procedures are followed during Fire Drills and monitor the actions of Fire Marshalls.

### 2.1.5 Safety Officer – Neil Coulter

- To collect all relevant Safety Data Sheets for chemicals used in the Company, update the master set of Safety Data Sheets and bring any changed information to the notice of the appropriate Heads of Department.
- To evaluate and validate the Risk Assessments undertaken by Heads of Department and ensure that they are adequate.
- To ensure that appropriate training is provided and keep a list of the training provided in relation to Abrasive Wheels, First Aid, Forklift Truck drivers, Fire Marshals etc.
- To keep essential health and safety reference documents, registers etc. and ensure the display of appropriate safety signs and posters (including fire notices).

- To select appropriate Personal Protective Equipment, First Aid and other safety equipment.
- To monitor and audit all necessary records, including records of accidents, maintenance and testing of the Fire Alarm and other statutory record keeping requirements.
- To act as an appointed Competent Person under Regulation 6 of the Management of health and Safety at Work Regulations by providing relevant assistance to Heads of Department.
- To act as Executive Secretary of the Safety Committee.
- Authority to interpret this policy in accordance with general policy statement where specific issues are not covered.

**2.1.6 Safety Supervisor – Neil Coulter**

- To ensure that employees follow the Health and Safety at Work rules and procedures.
- To identify safety training needs and report these to the Heads of Department, so that training can be provided.
- To ensure adequate standards of housekeeping and correct storage of goods, including highly flammable liquids and other flammable and/or combustible materials.
- To ensure that employees maintain good health and safety at work standards, including the adequate control of fire risks.
- To ensure that all accidents and first aid treatments are recorded and brought to the notice of Head of Department.
- In the event of a fire or Fire Drill, to hold the register of persons present in the section and undertake a role call at the Fire Point and (if appointed) act as a Fire Marshall.

**2.1.7 Employees**

- To take reasonable care for their own health and safety and for the health and safety of others who may be affected by their acts or omissions.
- To make proper use of all machinery, chemicals, safety devices and other equipment (including Personal Protective Equipment) provided for their health and safety.
- Not to interfere with or misuse anything provided in the interests of health, safety and welfare.
- To co-operate with the Company to enable the requirements of the law to be observed.
- To report all accidents, no matter how minor, to the Head of Department or First Aider.
- To report any dangerous conditions, inadequately controlled risks and any incidents to the head of Department so that remedial action can be taken.
- To work in accordance with the safety rules and procedures established for the Company and described in the Safety and Accident Prevention Handbook.

**3. Administration of Health and Safety at Work**

**3.1 Introduction**

This section of the Health and Safety Policy sets out the systems and procedures which have been established to ensure satisfactory administration of Health and Safety at Work in the Company. In establishing these procedures, due regard has been paid to the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999.

General health and safety procedures are contained in this part of the Health and Safety Policy. Detailed health and safety procedures for risk control, including engineering standards and

working practices, are included in the separate Health and Safety Manual. Also, general safety rules for employees are outlined in the separate Safety and Accident Prevention Handbook.

### 3.2 Health and Safety Legislation

The Safety Officer is responsible for ensuring that the Company is kept up to date with changes in Health and Safety at Work legislation. Details of changes should be discussed with the Location Manager and/or the Works Engineer, as appropriate.

When appropriate, the Company will obtain copies of new Health and Safety at Work publications. These publications will be added to the basic library of health and safety publications held by the Safety Officer.

The reference documents held by the Safety officer are available to all Heads of Departments for inspection. Individual employees may also have access to these reference documents, on request to the appropriate Head of Department.

### 3.3 Arrangements for Undertaking Risk Assessments

The responsibility for ensuring that suitable and sufficient Risk Assessments have been undertaken has been allocated to the Head of Department for Work Activity Risk Assessments and to the Works Engineer for Workplace Risk Assessments.

The Work Activity Risk Assessments should be undertaken within each department by a small group, typically made up as follows:

- Head of Department
- Occupational Nurse (if appropriate)
- Safety Supervisor
- Safety Representative

The draft Work Activity Risk Assessments should then be handed to the Safety Officer to be checked and validated. The Safety Officer is then responsible for co-ordinating the implementation of the Risk Assessment with the Head of Department and Works Engineer, as appropriate.

The Safety Officer will then ensure that the validated Work Activity Risk Assessments are explained to employees by way of appropriate safety training. The Safety Officer will also ensure that adequate Record Keeping systems are put in place.

In relation to the Workplace Risk Assessments, the Works Engineer will co-ordinate the Risk Assessment exercise by means of a small group comprising:

- Works Engineer
- Safety Officer
- Head of Department
- Safety Representative, when appropriate

The Works Engineer and the Safety Officer will jointly ensure that the Workplace Risk Assessments are implemented and adequate record keeping systems are put in place.

### 3.4 Safety Training

Adequate instruction will be given to all employees on the safety systems and procedures relevant to their own work activities. Supervision is responsible for ensuring that due regard is paid to the health and safety capabilities of employees when allocating work tasks.

The Company has produced a Safety and Accident Prevention Handbook. A copy of the handbook will be handed to each employee and basic instruction on the contents of the handbook will be given. Each employee will be required to sign stating that they have received a

copy of the Safety and Accident Prevention Handbook and have been instructed in the contents of the handbook and in their obligations under Health and Safety at Work legislation.

### 3.5 Safety Notices and Communications

A copy of the General Statement of Policy on Health and Safety at Work will be displayed on appropriate notice boards. Also, the minutes of the latest Safety Committee Meeting will be posted for the information of employees.

The Safety Officer is responsible for ensuring that all statutory and other safety notices and placards are displayed, including the Electric Shock Placard. Also, the Safety Officer will co-ordinate safety campaigns, including the display of safety posters, when necessary.

Employees will be encouraged to report safety concerns to Supervision and/or the Head of Department. Reporting of safety concerns is a legal responsibility placed on employees and the Company will ensure that all such reports receive due consideration.

### 3.6 Safety Committees and Safety Representatives

The Company recognises the important part played by Safety Representatives in ensuring that adequate standards of Health and Safety at Work are achieved and maintained. Appropriate facilities will be made available to Safety Representatives and adequate time will be allowed so that they can fulfil their functions successfully.

Routine meetings of the Safety Committee will be held and the membership of the Safety Committee will be as follows:-

- Director & Health and Safety Officer (Chairman)
- Safety Supervisor (Secretary)

The Safety Committee will meet on dates set by the Committee Chairman. Minutes of the meetings will be circulated to members of the Safety Committee with additional copies displayed on appropriate notice boards.

### 3.7 Disciplinary Procedures

As part of ensuring that employees adhere to the safety rules and procedures established by the Company, the established Disciplinary Procedure will apply to Health and Safety at Work matters.

Any employee, irrespective of seniority, failing to follow established safety standards and procedures will be liable to disciplinary action. This will include formal verbal warning, written warning, and other appropriate disciplinary measures. Records will be kept of all disciplinary warnings and the Safety Officer is responsible for ensuring the correct and consistent application of disciplinary procedures to safety matters.

### 3.8 Records and Registers

The Head of Department for any area is responsible for keeping necessary records for matters under his control. Each Head of Department should ensure that all the records for which he is responsible are kept up to date and all safety posters and safety notices are not defaced and are kept clearly visible.

The Safety Officer and the Works Engineer each have responsibilities for the safety records that relate to the site as a whole. Precise allocation of Record Keeping responsibilities will be clearly specified in the separate Health and Safety Register. The Safety Officer is responsible for fulfilling his own record keeping obligations and is also responsible for auditing other records on a routine basis. Failure to maintain adequate records is a serious matter that will be subject to disciplinary action in appropriate cases.

Records will be kept up to date and distributed to appropriate personnel for completion and/or for information, as applicable. In particular, the Safety Officer or the Works Engineer will retain relevant records, including the following, as detailed in the separate Health and Safety Register:

- Appointment to change Abrasive Wheels
- Decoration of walls
- Examination and test of portable electrical equipment
- Fire and emergency drills
- First Aid training
- Food hygiene training
- Inspection of fire extinguishers
- Issue of Personal Protective Equipment
- Noise measurements
- Record of water checks and treatments
- Record of fire training
- Testing Fire Alarm
- Thorough examination and test of Respiratory Protective Equipment
- Training in use of Personal Protective Equipment
- Waste disposal records

### 3.9 Fire Safety Standards

The Works Engineer has overall responsibility for fire safety at work, including organising fire drills, organising testing of the Fire Alarm, checking fire extinguishers and ensuring full compliance with the Fire Certificate.

Supervision are appointed as Fire/Emergency Marshals. They should be aware of fire risks and report matters of concern to the appropriate Head of Department. Supervision should also assist the Works Engineer with the maintenance and checking of fire extinguishers and the Fire Alarm, as requested.

In the event of a fire or Fire Drill, Supervision will ensure that established fire procedures are followed. This will include ensuring that the building has been evacuated in the event of fire or a Fire Drill. Any difficulties encountered during a fire evacuation or drill should be reported to the Works Engineer, as soon as possible after the event.

Only the appointed Fire/Emergency Marshals are trained and authorised to use fire fighting equipment, including hoses and fire extinguishers. Due regard should always be paid to training in use and personal safety when tackling a fire.

### 3.10 First Aid at Work

Nominated persons will be trained as qualified First Aiders. Volunteers from amongst the workforce are always invited. In particular, Heads of Department, Supervisors and security staff will be encouraged to train as First Aiders.

First Aiders should ensure that all accidents and First Aid treatments are recorded in accordance with company procedures.

A list of current First Aid personnel will be posted at each First Aid Box and a copy will be kept by the Safety Officer. The Safety Officer will also ensure that refresher training of First Aid personnel takes place, as appropriate.

### 3.11 Accident and First Aid Procedures

It will be the responsibility of the First Aider providing first aid treatment to ensure that details of the treatment are recorded. Employees are obliged to report every injury (no matter how minor) to Supervision or to a First Aider for treatment.

Details of First Aid treatments will be recorded and will be analysed by each Head of Department on at least a monthly basis. He is responsible for ensuring adequate investigation of all accidents, after discussion with the Location Manager when appropriate.

In the event of a serious injury that results in lost time, the Location Manager should be advised as soon as possible. Should an accident result in a Major Injury, then immediate telephone notification to the Health and Safety Executive is required. This immediate telephone notification will be made by the head of Department, after liaison with the Location Manager.

Written notification of accidents which cause more than 3 days absence from work will be prepared by the Head of Department on the appropriate record form. The form will be checked and approved by the Location Manager before despatch to the Factory Inspector.

Accident investigation will be undertaken in the case of every accident that is reportable to the Health and Safety Executive. The Location Manager may, at his discretion, initiate a more detailed investigation of certain accidents. He will invite appropriate persons to assist in the investigation, so that the circumstances of the accident can be established and necessary actions taken to prevent a recurrence. Health and Safety Executive leaflet HSE17 contains details of reporting procedures. A copy is held by the Works Engineer.

Generally speaking, reportable dangerous occurrences are serious events that would, in any case, be reported to the Location Manager for appropriate action. If a Head of Department believes that a reportable incident may have occurred, then the Location Manager should be advised, before work resumes – if possible.

### 3.12 Employee Medical Arrangements

The Company has a policy of ensuring that all new employees complete a pre-employment medical questionnaire. Where practicable, a pre-employment medical examination/assessment will also be undertaken. The examinations and the completion of the questionnaire will be undertaken under the rules of medical confidentiality and only non-clinical information will be kept on personnel files.

The Company Medical Officer will handle all medically confidential information and liaise with the employee's own General Practitioner, if necessary.

For some employees, routine health surveillance procedures will be necessary. Employees will be required to present themselves for these routine medical surveillance procedures as part of the main Terms and Conditions of Employment.

In particular, routine hearing tests will be undertaken on employees who work in noisy areas. Routine skin inspections and, as necessary, lung function tests (for appropriate employees) will be undertaken on the advice of the Company Medical Officer. Also, routine enquiries to detect the early signs of any Repetitive Strain Injury will be undertaken for employees who may be at risk of developing such medical conditions.

### 3.13 Visitors and Contractors on Site

Visitors on site are the responsibility of their host. Visitors to the offices should be accompanied at all times and they remain the responsibility of their host during fire evacuation or other unusual or unplanned circumstances.

Visitors who also require access to working areas must make use of suitable eye protection, hearing protection etc as necessary. The host should ensure that visitors are not placed at risk during site visits. In particular, visitors should be kept out of the work site and away from noisy areas, as far as possible.

Contractors who are employed to undertake work in office and site areas cannot be accompanied at all times. The satisfactory conduct of contractors on site is the responsibility of the Works Engineer. He should ensure that contractors are aware of the hazardous areas in the Company. The Works Engineer should also ensure that contractors have appropriate Personal Protective

Equipment, such as goggles and ear muffs, available for their use. Contractors are required to advise the Works Engineer of any accidents and injuries to their employees on Company premises.

Contractors arriving on site should report to the Works Engineer. Contractors will then be briefed by the Safety Officer and he should confirm what plant and equipment is to be used by the contractors. The Safety Officer should obtain assurances that the plant and equipment is in good condition and he should advise the contractors whether it is acceptable for the contractor to use Company services, such as electricity and compressed air.

The Works Engineer should inform the appropriate Head of Department when contractors have been authorised to work in his area. The co-operation of the Heads of Department, Supervision and all employees is necessary, so that any dangerous contractor practices will be identified, reported and eliminated for the benefit of the contractors and all persons who work on Company premises.

Contractors found to be disobeying Company safety rules, failing to make use of necessary Personal Protective Equipment, using defective or dangerous equipment or working with disregard to their own safety or that of others may be dismissed from site.

### 3.14 Visits to Other Locations

From time to time, employees will be required to visit locations under the control of another employer. In these circumstances, the host employer is responsible for ensuring the safety of Company personnel.

Company employees should ensure that they are given sufficient information by the host to protect their own health and safety at host premises. Safety problems should be reported to the host so that suitable remedial action may be taken.

The Company personnel who are on host premises must obey the safety standards laid down by the host. This will include the items set out under the Visitors and Contractors on Site section of this Health and Safety Policy, when appropriate.

If the standards set down by the host are lower than normal Company standards, then the Company standards and procedures should be followed. If this gives rise to difficulties which cannot be resolved locally, then the matter should be referred to the appropriate Head of Department, for action.

### 3.15 Enforcing Authority Visits

Various enforcing officers will visit the Company from time to time. Environmental Health Officers and Fire Officers all have statutory authority to visit the Company to enforce legislation under their control.

The fullest co-operation with all visiting enforcement officers will be ensured and the Company will always be responsive to recommendations and advice received. The Location Manager will liaise with visiting enforcement officers and ensure that they are accompanied during their visits. In his absence, the Safety Officer or Works Engineer will be responsible for appropriate liaison.

In the event of a night visit, or if none of the above officers of the Company are available, then the appropriate Head of Department should meet the visiting enforcement officer. The Head of Department should co-operate fully with the visiting inspector.

A visiting card should always be obtained from the visiting enforcement officer and this card should be passed to the Location Manager as soon as possible. The Head of Department should give a verbal report of matters discussed and actions required to the Location Manager as soon as possible after the visit.

### 3.16 Monitoring and Auditing of Health and Safety at Work

Safety standards for all work activities undertaken at the Company have been established. Appropriate Risk Assessments have been undertaken, as required by the Management of Health and Safety at Work Regulations 1992 and other legislation.

In order to ensure that satisfactory standards of Health and Safety at Work continue to be achieved within the Company, routine safety checks and inspections will be undertaken. Each Head of Department will be required to undertake a weekly safety checklist inspection and ensure that all items referred to in the checklist are satisfactory.