



Health, Safety and Welfare Policy Document

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Unit 7, Progress Way,
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Eye, Suffolk IP23 7HU

INTRODUCTION

First Industrial Tyres established in 2010 are national mobile tyre fitting specialists of industrial tyres.

First Industrial Tyres are currently based at 9 depots, two of which are sub-depots, across the UK and are continuing on an on-going expansion programme.

First Industrial Tyres also has its own warehousing facility located in Eye, Suffolk which is also the Company Head Office.

This Health, Safety & Welfare document sets out the aims of the company, details the organisation that will manage and promote its objectives, together with the arrangements that it considers necessary to inform and guide personnel in achieving a good safety, health and environmental culture which is of utmost importance to the company.

This policy is prepared in accordance with section 2(3) the Health and Safety at Work etc. Act 1974, with the intention of promoting a safe working environment that will, so far as is reasonably practicable, ensure the safety and health of all employees and to enable the company to comply with legislation.

A safe place of work and safe systems of work can only be achieved by the co-operation of employees and management with a determination to promote and maintain a strong safety culture in all of the company's activities.

This document is important to your personal safety and health whilst at work therefore it is essential therefore that you read it.

For the purpose of this policy document First Industrial Tyres Ltd is replaced with 'Fit'

For ease of reference the policy documentation consists of three sections:

- | | |
|-----------|---------------------------------|
| Section 1 | Policy Statement |
| Section 2 | Organisation & Responsibilities |
| Section 3 | Arrangements |

SECTION 1: GENERAL STATEMENT OF POLICY

Fit is committed to ensuring the health, safety and welfare of its employees, and it will, so far as is reasonably practicable, establish procedures and systems necessary to implement this commitment and to comply with its statutory obligations on health and safety. It is the responsibility of each employee to familiarize themselves and comply with the Company's procedures and systems on health and safety.

The company is committed to comply with all relevant health and safety legislation as a minimum achievement level and to continually improve health and safety performance through appropriate initiatives, controls, provision of resources and training of employees.

The company recognises and accept its duty to protect the health and safety of all visitors and customers to the company, contractors and temporary workers who may be working on behalf of the company and members of the public who might be affected by our operations.

The Company will provide and maintain a healthy and safe working environment with the objective of minimising the number of instances of occupational accidents and illnesses.

So far as is reasonably practicable, the Company will:

- Provide adequate control of the safety, health and environmental risks arising from our work activities;
- Consult with our employees on matters affecting their health and safety, *refer to section 3.5*
- Provide and maintain safe plant and equipment at each depot and in all work vehicles, *refer to section 3.30*
- Ensure the safe storage, handling and use of substances at all depots, *refer to section 3.7*
- Provide information, instruction and supervision for employees, *refer to section 3.4*
- Ensure all employees are competent to do their tasks, or supervised by a competent person whilst under training, *refer to section 3.4*
- Provide adequate training including Health & Safety Awareness for all managers and persons who work alone, *refer to section 3.4*
- Prevent accidents and cases of work related ill health as far as is reasonably practical, *refer to sections 3.2 & 3.15*
- Maintain safe and healthy working conditions; and
- Review and revise this policy annually or as necessary e.g. if changes in the scale and nature of our operations arise and when changes in legislation occur. (*Wendy Hall will notify the MD of all changes in legislation that could affect the company*).

Whilst the management of Fit will do all that is within its powers to ensure the health and safety of its employees, it is recognised that health and safety at work is the responsibility of each and every individual associated with the company.

It is the duty of each employee;

- To take reasonable care of their own and other people's welfare and to report immediately any situation, which could jeopardise the well being of himself or herself or any other person;
- To co-operate with the company on matters of health & safety;
- To correctly use work items; and
- Not to interfere with or misuse anything provided for their health, safety or welfare.

The responsibilities, organisation and specific arrangements for the implementation of this policy are detailed within sections two and three of the policy document.

Signed:

Printed: Edward Woolley

Dated: 27 July 2020

Title: Managing Director

SECTION 2: RESPONSIBILITIES AND ORGANISATION

GENERAL

Specific health and safety responsibilities and general adherence to the policy is vested in each level of the management structure in accordance with the organisational chart that is located at the end of this section.

The person with overall and final responsibility for health and safety in Fit is the Managing Director Mr Edward Woolley.

Responsibilities for health and safety at individual depots, sites and other locations are assigned to the person in charge of a work area, in accordance with the usual chain of line management as detailed in the safety, health and environmental organisational chart located at the end of this section.

Management and supervisory staff have the responsibility for implementing this policy throughout the Company for and on behalf of the Company and must ensure that and safety, health and environmental considerations are given a priority in planning and day to day supervision of work and that they understand the responsibilities placed upon them as detailed below.

The person responsible for overseeing and monitoring the policy along with the MD is the Company Health & Safety Consultant, Mrs Wendy Hall Tech IOSH of ETR H&S Services Ltd.

All employees and individuals are expected to co-operate with the Company in carrying out this policy and must ensure that their own work is carried out without risks to themselves or others, and in accordance with the contents of section 3 that forms the Arrangements section of this policy.

It is the obligation of all employees to bring to the attention of their manager, any matters they consider to present a risk to their own health and safety and to that of other persons who may be affected.

ORGANISATION AND RESPONSIBILITIES

Responsibilities have been defined for each of the following roles:

| Job Title | Name |
|--------------------------------|--|
| Managing Director | Mr Edward Woolley –Responsible for the Companies Health & Safety |
| H&S Consultant | Mrs Wendy Hall Tech IOSH of ETR H&S Services Ltd |
| Depot Managers | Tony Atkins – Purfleet Depot Andy Graves – Peterborough Depot John Collinson – Washington Depot Brett Alderson – Preston Depot Tommy Hinton – Belfast Depot |
| Industrial Tyre Fitters | David Dinnage – Eye Depot Ian Trechsler – Purfleet Depot Marc Archer – Purfleet Depot Jason Hughes – Yate Depot Stewart Pattison – Peterborough Depot Dan Graves – Peterborough Depot Chris Pollard – Hull Depot Karl Brown – Washington Depot Micky McKnight – Andover Depot Brett Alderson – Preston Depot Eddie Scanlon – Belfast Depot Brodie McKee – Belfast Depot |
| Depot Office Staff | Lisa Dennis – Office administrator Purfleet, Newhaven, Avonmouth and Newbury Depots. |
| Warehouse Staff | Trudi Nobbs – Warehouse Administrator Ron Martin - Warehouseman |
| Head Office Staff | Kerry Woster – Accounts and HR Administrator Paul Marlow – Collation of Depot monthly reports and H&S paperwork, arranging servicing and testing of Company equipment. Trudi Nobbs – Product Purchasing |
| First Aiders | Depot Managers and persons who Work Alone, plus one administration member of staff at HO |
| Fire Responsibilities | All staff with Fire Safety/Fire Prevention training |
| Sales Staff | Richard Naylor – UK Sales Manager |

MANAGING DIRECTOR

1. Will assume full authority in all matters affecting the health & safety of people engaged in the work of Fit.
2. Will provide support for all necessary programmes of action by appointed members of staff with responsibility for promoting safe working.
3. Will ensure the definition and implementation of the company health, safety and welfare policy in consultation with all Management. Ensure that it is brought to the notice of employees and effectively implemented in all functions under their control, through the management structure.
4. Be aware of the requirements of current and changes in health and safety legislation which affect the company, as advised by *Wendy Hall of ETR H&S Services*.
5. Will ensure that all company operations and premises are suitably risk assessed for safety in general and procedures are put in place for fire and emergencies including evacuation and that all personnel are trained and/or instructed in those procedures. Fire Risk Assessments for the relevant depots are to be completed (this does not include containers).
6. Will encourage a climate of accident prevention and hazard removal in accordance with the Company policy.
7. Will ensure that adequate resources, including financial provision, are made available to meet the requirements of the health, safety and welfare policy.
8. Will ensure that Managers have the health & safety competency for ensuring the day to day running of depot and site operations by providing suitable tailored training for this purpose.
9. Will ensure that all liability is adequately covered by insurance.
10. Consider and respond appropriately to all reasonable and proper safety matters as may be presented by the work force.
11. Make sure that adequate consultation is undertaken with employees to ensure that suitable account is taken of their concerns in respect to safety, health and environmental practices. *Refer to section 3.5*
12. Ensure that all employees of Fit are suitably trained to enable them to carry out their duties safely and efficiently. The managers to have the 'Continental Tyre Fitting' training which they can then pass down to employees under their control in conjunction with Fit011 form.
13. The investigation and reporting of accidents, industrial diseases and dangerous occurrences as defined under RIDDOR, reporting these to the Health and Safety Executive where required.

H&S CONSULTANT (works carried out by ETR H&S Services Ltd as requested and agreed by First Industrial Tyres management)

1. Monitor the health, safety and welfare policy implementation and keep the Managing Director fully informed of the current issues and performance.
2. Advise the Company on all aspects of safety, health and environment, either through own knowledge or seeking external advice when necessary.
3. Shall continually review the responsibilities with regard to safety, health and environment in conjunction with the Managing Director.
4. Keep the company health, safety and welfare policy under review, amending and updating as necessary; communicating any such change to the MD.
5. Help managers and supervisors to establish safety training needs and meet their various responsibilities in respect of safety at work.
6. Implement a robust accident and near miss reporting and investigative procedure.
7. Ensure that suitable procedures are in place for all emergencies including fire control and evacuation and those personnel are trained and instructed in those procedures. Ensure that company premises are fire risk assessed and action plans devised if necessary and communicated to management.
8. Ensure management are aware of current and pending safety, health and environmental legislation applicable to the company.
9. Develop and maintain her competence in matters of safety as to enable her to protect the company from infringement of the Health and Safety at Work Act and associated regulations.
10. Shall ensure that the appropriate contact is maintained with:
 - (a) The Health and Safety Executive.
 - (b) The local enforcing authority
11. Provide office safety, health and environmental support when requested by management.
12. Recommend that adequate consultation is undertaken with employees to ensure that suitable account is taken of their concerns in respect to safety, health and environmental practices.
13. Set a personal example by wearing the appropriate PPE when visiting depots and sites and showing an interest in all aspects of safety, health and environment.

DEPOT MANAGERS

1. Understand the requirements of the company health, safety and welfare policy and his/her responsibilities within it. Have a practical understanding of safety and health legislation and regulations and ensure compliance.
2. Promote and ensure implementation of the company health, safety and welfare policy & procedures within their areas of responsibility.
3. Will inform the Managing Director of any shortcomings within the health and safety management system and make arrangements for rectification.
4. Ensure that work activities under their control are adequately planned, organised, monitored and reviewed.
5. Ensure that appropriate risk assessment technique is used to identify hazards and those who might be exposed to them, to assess the risks and determine whether they are adequately controlled and what further action might be necessary to achieve adequate control.
6. Ensure that all persons under their control are adequately trained to carry out their duties and are fully aware of safety health and environmental hazards and precautionary measures. This will include safety inductions for new starters
7. Ensure that safety method statements are prepared for all activities that involve significant hazards. Method statements are to reflect the findings of risk assessment and are to be reviewed on a continual basis.
8. Establish and maintain places of work, access and egress that are safe and without risk to health
9. Record in the accident book and report on all accidents and/or incidents promptly and ensure that remedial measures are taken to avoid recurrence. The form to be scanned and emailed to HO for filing in the blue folders.
10. Encourage all employees with regard to reporting near-misses via the email address h&s@firstindustrialtyres.com
11. Encourage operatives under their control to report hazards and any defects in work equipment. Address any hazards reported or observed and take out of action any defective plant or equipment.
12. Ensure that plant and equipment used at depots or on site is safe, free from defect and has the required statutory certification.
13. Ensure that all plant operators, e.g. forklift trucks, possess a valid certificate of training for the equipment to be operated
14. Maintain a tidy depot by arranging for the safe storage of equipment and tyre products, ensuring that racking is visually checked and inspected for damage on a regular basis and that weight limits are not exceeded.
15. Ensure the provision of suitable and adequate welfare facilities for use by all employees
16. Reduce the need for manual handling wherever possible and ensure that remaining manual handling tasks are risk assessed and undertaken by workers of proven fitness. All relevant employees' e.g. industrial tyre fitters to have suitable tailored manual handling training.
17. Co-operate with the MD & company H&S Consultant in all matters of health and safety
18. Utilise the disciplinary procedures if safety is not adhered to by contacting the MD for him to take any necessary action.
19. Set a personal example by wearing the appropriate PPE when visiting depots and site and showing an interest in all aspects of safety, health and environment.

ALL EMPLOYEES INCLUDING INDUSTRIAL TYRE FITTERS

All employees carry individual responsibilities under the Health and Safety at Work Act, these include:

1. To take reasonable care for the safety of themselves and of any other person who may be affected by what they do or fail to do at work
2. To co-operate with their employers or any other persons in the performance of their statutory duties
3. To correctly use work items provided by the company, including personal protective equipment, in accordance with training or instructions, and
4. Not to misuse or interfere with anything provided in the interest of health, safety and welfare.

All employees must also comply with the requirements of this policy and co-operate with the company in its efforts to prevent accidents and ill health.

In particular they will:

1. Read and comply with all company rules (Refer to section 3, item 3.1 of this policy)
2. Behave in a responsible manner at all times
3. Report damage to plant and equipment to their immediate manager
4. Use only that work equipment for which they have received training and authorisation
5. Use and look after the protective equipment provided and report to their manager worn, defective or lost equipment
6. Ensure that any personal injury is reported and recorded in the company accident book.
7. Propose to their manager ways of eliminating hazards and improving safety at their workplace

No employee shall be penalised for refusing to undertake their work on grounds of health and safety.

EMERGENCY FIRST AIDERS

All Managers, persons who Work Alone and one HO administrator to have Emergency First Aid training, they have responsibility for summoning the emergency services if assistance is required following an accident or injury at work.

Additional responsibilities include:

1. Ensuring that 1st aid provisions are maintained with sufficient supplies, replacing as necessary, including those in work vehicles.
2. Report and record all accidents and incidents ensuring that a copy is scanned to h&s@firstindustrialtyres.com.
3. Issue on request all copies of the company general accident records to the MD.
4. Attend in the event of accidents; carry out minor treatment if required, calling the local Health Centre or emergency services if required.
5. Hold a suitable certificate for Emergency 1st Aid, renewing every three years.

FIRE SAFETY & PREVENTION TRAINED STAFF

All staff will receive basic fire safety & prevention training which will help to reduce the risk of a fire starting and will enable staff to ensure that in the event of a fire everyone is able to leave the premises quickly and safely.

All staff must:

1. In the event of a fire, evacuate efficiently and safely from the building and go to an area of safety.
2. Familiarise yourself with fire escape routes and fire procedures and be aware of any specific needs of any staff in the building e.g. disabled persons, contractors & visitors.
3. Ensure all fire exits and escape routes remain unobstructed at ALL times.
4. Managers to keep records of all equipment testing & maintenance, fire drills etc in the Fire Log book at each depot.
5. Carry out regular inspections of all firefighting and detection equipment to ensure it is in working order and has not been tampered with.
6. To be first point of contact for the emergency services.

VISITORS

All visitors must report to the Depot Manager or person in charge of the depot at the time. Visitors should be accompanied throughout their visit by an appropriate member of staff. The member of staff must make their visitor aware of any dangers or hazards, fire procedure and should look after the visitors during their visit. Visitors must comply with the Company Health and Safety procedures. Outside normal business hours, visitors are not permitted without the permission of the Depot Managers.

SECTION 3: ARRANGEMENTS

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3. LEGAL REGISTER

The following are to be viewed as applicable Health and Safety Legislation.

- The Health and Safety at Work etc. Act 1974.
- The Management of Health and Safety at Work Regulations 1999 (as amended)
- The Provision and Use of Work Equipment Regulations 1998 (as amended)
- The Workplace (Health, Safety and Welfare) Regulations 1992 (as amended)
- The Manual Handling Operation Regulations 2002 (as amended)
- The Personal Protective Equipment at Work Regulations 1992 (as amended)
- The Health and Safety (Display Screen Equipment) Regulations 1992 (as amended)
- The Control of Substances Hazardous to Health Regulations 2002 (as amended)
- The Lifting Operations and Lifting Equipment Regulations 1998
- The Electricity at Work Regulations 1989.
- Control of Noise at Work Regulations 2005.
- Control of Vibration at Work Regulations 2005.
- The Health and Safety (First Aid) Regulations 1981 (as amended)
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.
- The Health and Safety Information for Employees Regulations 1989.
- The Health and Safety (Consultation with Employees) Regulations 1996.
- The Health and Safety (Training for Employment) Regulations 1990.
- The Health and Safety (Young Persons) Regulations 1997.
- The Health and Safety (Safety Signs and Signals) Regulations 1996.
- Employers Liability (Compulsory Insurance) Act 1969
- The Employer Liability (Compulsory Insurance) Regulations 1998.
- Working Time Regulations 1998 (as amended)
- Regulatory Reform (Fire Safety) Order 2005
- Health and Safety (Offences) Act 2008

3.1. SAFETY RULES FOR ALL EMPLOYEES

Listed below are summaries of general safety rules, which are applicable to all company employees and are prepared in accordance with legal requirements and with acknowledged safe working practices. In addition there is a legal duty imposed upon employees to comply with these rules, as breaches of the rules could result in disciplinary action that could possibly result in dismissal.

- Comply with the company health, safety and welfare policy
- Observe the safety rules
- Report any safety hazard within your work area or defect in any plant, machinery or equipment
- Comply with all written or verbal instructions given to you to ensure your personal safety and the safety of others
- Notify your manager of any known defect, omissions or difficulties in complying with the requirements of a devised safe system of work or requirements of company risk assessments.
- Dress sensibly and safely
- Conduct yourself in an orderly manner in the workplace and refrain from any form of horseplay
- Use the safety equipment and/or protective clothing provided
- Avoid improvisation in any form that may create a risk to your safety and to the safety of others
- Maintain all equipment in good condition (within your training and capabilities) and report defects
- Report all accidents whether injury is sustained or not
- Attend, as requested, any training course, meeting etc designed to further the interests of health and safety
- Observe all laid down procedures concerning work activities, plant, materials, substances etc.
- Only operate work equipment and carry out work activities for which you have been trained and instructed.

No-one should undertake any work related activity until they have been made fully aware of the hazards and associated risks and the control measures to prevent damage, danger or injury.

Should an employee fail to understand any of their imposed duties as described above then they should seek clarification through their Manager.

No employee shall be penalised for refusing to undertake their work on grounds of health and safety.

3.2. ACCIDENT INVESTIGATION AND REPORTING

It is the policy of Fit to comply with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

ACCIDENT REPORTING

All injuries, diseases or dangerous occurrences that involve an actual accident or a near accident with no injury must be reported.

Employees of the company shall report all accidents whether injury is sustained or not immediately to their manager or the Managing Director.

Where an accident or incident occurs on another person's premises, the person in charge of that premises must be informed and details recorded in their accident book. The accident must also be reported to their Manager immediately.

The MD will report accidents, incidents or diseases to the enforcing authority as required under The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR). In some instances (fatalities) the Health and Safety Executive (HSE) need to be advised immediately by phone. As of **6 April 2012**, RIDDOR's over-three-day injury reporting requirement has changed. The trigger point has increased from over three days' to over seven days' incapacitation (not counting the day on which the accident happened).

Incapacitation means that the worker is absent or is unable to do work that they would reasonably be expected to do as part of their normal work.

Fit will still keep a record of all over-three day-injuries in the accident book.

All incidents can be reported online but a telephone service is also provided for reporting fatal and specified injuries **only** - call the Incident Contact Centre on 0345 300 9923 (opening hours Monday to Friday 8.30 am to 5 pm).

The accident or incident shall be reported by using the appropriate online form at: <http://www.hse.gov.uk/riddor/report.htm>.

NB: A report must be received within 10 days of the incident.

For accidents resulting in the over-seven-day incapacitation of a worker, you must notify the enforcing authority within 15 days of the incident, using the appropriate online form.

All injuries shall be recorded in the 'Depot' accident book, which shall be maintained by each Depot Manager. All reports will be scanned and emailed to h&s@firstindustrialtyres.com

Upon notification of a serious accident the Managing Director shall consult with the H&S Consultant if they are uncertain as to whether the insurance broker should be contacted. If applicable, immediate notification must be made, and confirmed in writing with a photocopy of the entry in the accident book.

Whether or not the insurance company need to be notified, every instance must be the subject of discussion and investigation by the Managing Director and H&S Consultant in order to ensure that the company is satisfied that all possible precautions are undertaken to ensure that no similar incident can happen again.

The minutes of such meeting should be taken and recorded.

ACCIDENT INVESTIGATION

All accidents shall be investigated; this is the responsibility of the MD who may request assistance from the company H&S Consultant.

In the case of a significant accident the company H&S Consultant will conduct the investigation herself along with the co-operation of the Managing Director and any other person necessary involved in the investigation.

When investigating an accident the Accident Investigation Report Form is to be completed.

The main principles of accident investigation will include:

- Find out what happened, how it happened, look for causes
- Discover the nature of any injury and current state of the casualty
- Interview witnesses and take statements as soon as you can
- Take photos of the accident scene or make a sketch
- Record all contact with the enforcing authorities, HSE, in respect to the accident/incident
- Check the equipment being used, was it used properly, was it the correct equipment?
- Was the equipment correctly maintained?
- Check that safety procedures were being followed. If not, what was happening?
- Keep all records of investigations secure and return to the safety officer.

Fit sees accident investigation as a valuable tool in the prevention of future incidents. In the event of an accident resulting in injury a report will be drawn up by either the MD or H&S Consultant detailing:

- The circumstances of the accident including photographs and diagrams wherever possible
- The nature and severity of the injury sustained
- The identity of any eyewitnesses
- The time, date and location of the incident
- The date of the report

All eyewitness accounts will be collected as near to the time of the accident as is reasonably practicable

The completed report will then analysed by the Managing Director and when requested, the H&S Consultant, who will attempt to discover why the accident occurred and what action should be taken to avoid a recurrence of the problem.

All reports will be submitted to the company insurance brokers who will advise on liability, proceedings and quantum of damages.

A follow up report will be completed after a reasonable period of time examining the effectiveness of any new measures adopted.

3.3. ALCOHOL AND DRUG ABUSE

Alcohol and drug misuse affects performance, behaviour and relationships at work and at home. There is overwhelming evidence of links between alcohol misuse and social and psychological disturbances, medical problems, accidents and violence. The company has a duty and desire to ensure the health, safety and welfare at work of its entire staff and accordingly views the promotion of good health as an integral part of its employment policy.

The policy is designed to:

- Detail the organisations approach to alcohol and drug consumption and attendant problems at work
- Raise awareness of the risks and assist where reasonable and practicable in the prevention of addiction
- Safeguard staff from the hazards of such abuse
- Ensure the early identification of problems, where possible.
- Provide advice and support where reasonably practicable to staff in overcoming their problems

The policy applies to all members of staff, regardless of contractual status.

- Every depot manager is responsible for ensuring that the policy is implemented
- Alcohol consumption on premises is prohibited to all staff, visitors, contractors and others, within the premises boundary including car parks and other external areas.
- Alcohol consumption must be managed by all staff such that no member of staff presents for work under the influence of alcohol, nor consumes alcohol during the working day (including when off-site, during lunch breaks, etc)
- Alcohol consumption in breach of the above restrictions is strictly prohibited, risks the safety and comfort of other staff and visitors, and will be regarded as a disciplinary matter.

Drug misuse by staff is strictly prohibited such that:

- No member of staff may present for work under the influence of misused drugs, nor may any member of staff misuse drugs during the working day (on the premises or off-site);
- Drug misuse in breach of the above restrictions is strictly prohibited, risks the safety and comfort of other staff and visitors, and will be regarded as a disciplinary matter.
- It should be noted that individuals considered by a responsible manager as incapable of performing duties safely or competently due to consumption of alcohol or drugs, will be immediately removed from work and management will be informed without delay.
- All staff are required to bring this policy to the attention of visitors, and to report to their manager if they see anyone consuming alcohol or misusing drugs, or appears to be under the influence.
- To supplement the restrictions of this policy, the company also wishes to offer assistance to members of staff who may have developed a problem with either drugs or alcohol.
- In addition, although the company may not tolerate criminal behaviour, it is possible for additional assistance to be offered to anyone identified as having an alcohol problem. For anyone so identified, from sickness absence records, self-reporting and other means, the following shall apply:
 - The work undertaken by the person shall be reviewed, seeking to identify causes of stress which may be reduced;
 - The company may make available confidential counselling or other support to assist the person concerned to recover his/her control.

3.4. CAPABILITIES & TRAINING

It is the policy of Fit to comply with Regulation 13 of the Management of Health and Safety at Work Regulations 1999. This regulation requires the company to ensure that the requirements of the work to be undertaken do not exceed the capabilities of the employee(s) being employed to carry out that work.

General

All employees training requirements shall be assessed by their Manager at least annually. Once agreed these requirements shall be actioned, recorded and monitored.

Management arrangements

Management have a responsibility to:

- Ensure that all new employees are provided with adequate health & safety induction training before being permitted to commence work.
- Depot managers to have the Continental Tyre Fitting course, they will be responsible for passing down the information and skills gained to employees under their control, using form Fit011 for the assessment.
- Determine the capabilities, training, knowledge and experience of employees to establish their suitability for relevant work activities using form Fit011 where appropriate. Once training requirements have been established management are to ensure that the training needs are recorded on the training matrix.
- Periodically repeat health and safety training where appropriate, usually every 3 years as recommended by the HSE.
- Ensure that training is adapted to take account of any new or changed risks to the health and safety of the employee, e.g. bespoke manual handling training.
- Ensure that the training takes place during normal working hours, wherever practicable.

The Depot Managers are responsible for recording all trainings on the company training matrix and for maintaining records of training within individual employee personal file.

SAFETY INDUCTION

- Management shall ensure that all new employees, including new starters, company employees transferred from other premises, before commencement of work, receive an induction on the safety and environmental procedures and rules applicable to the operations.
- The safety induction content shall include:
 - informing the employee of their specific duties and to whom he/she is responsible;
 - provide instruction on the purpose of the Health, safety and welfare policy and its content;
 - advise where the health, safety and welfare policy is kept for reference;
 - determine if the employee has any disability or illness that would prevent him/her from performing the duties expected of him/her in a competent manner;
 - ensure that suitable personal protective clothing is provided and instruction given on its proper use;
 - provide instruction on the emergency procedures relating to the premises or site;
 - inform the employees of the risks to their health and safety on site or in the work place;
 - inform the employees of the preventative and protective measures;
 - warn the employee of any compulsory requirements, prohibited actions or prohibited areas of operation.;
 - ascertain if specific training or instruction is required and to arrange for such training to be provided;
 - show the employee the location of the first aid box and explain the procedure in the event of an accident;

3.5. COMMUNICATION AND CONSULTATION

Communication

The management of Fit will communicate to employees their commitment to safety and the environment and to ensure that employees are familiar with the contents of the company Health, Safety and Welfare policy. Fit communicates with its employees orally, in the form of directions, H&S memo briefings issued/emailed quarterly from managers, this policy statement, and by example. The Managers will be responsible for informing all employees of any decisions made to improve the overall safety performance of the company.

Consultation

Consultation with employees will be in accordance with Health & Safety (Consultation with Employees) Regulations 1996, as amended. The management of Fit see communication between workers at all levels as an essential part of effective safety, health and environmental management. All employees will have the choice and be encouraged to use the email address h&s@firstindustrialtyres.com to report any issues they may have regarding H&S and put forward ideas of how H&S could be improved, all feedback will be welcomed and acted upon as/if required.

H&S Briefing Memo's

H&S briefing memos will be emailed to all employees by their manager at least quarterly, a read receipt will be requested, this will act as a signature to confirm that the employee has in fact read the memo. These memos will be relevant to any training requirements, changes to H&S legislation, changes to work equipment or procedures and any other H&S related topic to help reinforce the knowledge of the employee.

This could count towards an individual's annual safety training update if appropriate.

3.6 COMPETENT PERSONS

The Management of Health and Safety at Work Regulations 1999

In line with Regulation 7 of the Management of Health and Safety Regulations 1999, the Company have appointed **ETR H&S Services Ltd** as their competent persons to assist in undertaking the measures needed to be taken to ensure compliance with the requirements and prohibitions imposed under current, relevant statutory provisions.

Sufficient time and resources will be allocated to the competent persons as and when required to allow them to properly undertake the measures necessary.

3.7. CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

It is the policy of Fit to comply with the law as set out in the Control of Substances Hazardous to Health Regulations 2002, as amended.

Fit will ensure that exposure of workers to hazardous substances is minimised and adequately controlled in all cases.

Under the requirements of the COSHH regulations we have a duty to:

- Assess the risk to health created by work involving substances hazardous to health.
- Prevent or control exposure.

COSHH requires that no work which might expose employees to hazardous substances may be carried out until a suitable and sufficient risk assessment has been completed. Exposure to hazardous substances must be prevented, or controlled where prevention is not reasonably practicable.

The definition of substances hazardous to health in COSHH includes:

Substances classified as very toxic, toxic, harmful, corrosive or irritant. Such materials can be identified by hazard symbols on packaging.

It is the policy of Fit not to use hazardous substances if a non hazardous or less hazardous alternative is available.

Where hazardous substances may be used, Material Safety Data Sheets will be obtained from the supplier in preparation for COSHH risk assessment.

Where it is necessary for employees to use hazardous substances, a risk assessment will be carried out. The results of the risk assessment will be issued to employees, along with other appropriate information. Control measures will be put in place where risk assessment indicates this to be required.

3.8. CONTROL OF RISKS FROM HAND-ARM VIBRATION

The company is conscious of their legal duty under the HSAWA'74 and the Control Of Vibration at Work Regulations 2005 to minimise or eliminate where possible the effects of vibration in relation to work activities undertaken by its personnel.

HAV is vibration which reaches the hands of personnel when working with handheld power tools or hand guided machinery. Fit employees are not subject to long duration use of any vibrating equipment or plant, however some general information is provided below to highlight the potential risk to health from using vibrating equipment for long periods.

Symptoms include:

- Tingling and numbness in the fingers
- Fingers go white, then blue, then red and are painful in the cold and wet
- Feeling leaves the fingers (difficulty picking up small object such as screws or nails)
- Pain, tingling or numbness in your hands, wrists and arms which may stop you sleeping
- Loss of strength in hands (may be unable to pick up or hold heavy objects)

Hand Arm Vibration can seriously affect the health of personnel and cause a range of permanent injuries to the hands and arms which are known as hand arm vibration syndrome (HAVS).

These injuries include damage to the:

- Blood circulatory system (vibratory white finger (VWF));
- Sensory nerves
- Muscles;
- Bones;
- Joints

Personnel are required to co-operate with management in ensuring that problems due to vibration do not arise by informing their manager about any piece of equipment that produces a high level of vibration, so that suitable action can be taken to reduce the risk. Employees also have a duty to inform their manager of any HAV symptoms they may experience during or after using equipment.

3.9. CO-OPERATION & CO-ORDINATION

All employees are expected to co-operate with the company in meeting their statutory duties and to accept their duties under this policy. Disciplinary action may be taken against any employee who violates safety rules or who fails to perform his or her duties under this policy.

The management of Fit will:

- co-operate with other employers and those who may be affected by the work so far as is necessary, to enable them to comply with any relevant statutory provisions;
- co-ordinate measures taken by the company to fulfil its duties imposed by relative statutory provisions with that of other employers or others who may be affected by the works to enable each to fulfil their respective duties.
- So far as is reasonably practicable, Management will endeavour to inform other employers concerned of the risks to their employees health and safety arising from relevant company activities.

3.10 COMPLIANCE MONITORING

This procedure enlarges on the responsibilities and arrangements for checking, and monitoring, of the health, safety and welfare provisions. Compliance will undoubtedly lead to less injuries and illness and will contribute to the continual improvement and safety culture process.

Workplace Safety Inspections

The Depot Managers are to carry out checks on work areas monthly by completing the tick sheet designed to highlight any issues within the depot, it will be scanned and emailed or handed in to HO monthly. Findings, both positive and negative should be recorded and discussed.

Plant, Tools and Vehicle Inspections

The Depot Managers and/or Lone workers are to carry out checks and inspections monthly (using the appropriate tick sheet) for the following:

- Fork trucks
- Trailer Press's
- Press's
- Vehicles
- Tools

These reports will also be scanned and emailed or handed in to HO monthly.

Formal Safety Inspection & Audits

These will be conducted annually or as requested by the MD by the company's H&S Consultant, she will monitor and evaluate the safety performance of the company. She will work directly with the MD and/or the Depot Manager and will advise on best working practice as well as statutory obligations that require to be adhered to.

3.11 DISABLED PERSONS

The Health and Safety at Work Act 1974 requires employers to exercise a general duty of care towards all their employees. Most disabled employees neither need nor seek safety systems beyond those in place for the work force generally.

In practice, the company's duty of care extends to ensuring that disabled people are not exposed to workplace environments that are hazardous as a consequence of the particular disability (such as requiring a deaf person to work in a situation where reacting to sound is an important factor in personal safety).

Although employing disabled people never compromises health and safety standards, there may be a requirement to provide information or instigate training for other staff to ensure that both routine and emergency procedures work effectively.

Employees registered with the Employment Service as disabled are, where appropriate, entitled to personal equipment and/or workplace adaptations, which facilitate the work undertaken.

Record Keeping

The company will keep records of disabled persons in the work force of which there are none at this time and records of any special equipment provided or workplace adaptations made for the benefit of disabled persons. Any training provided to disabled persons will also be recorded.

3.12. ELECTRICITY AT WORK

It is the policy of Fit to ensure that all electrical installations, electrical equipment, power tools etc. used comply with the Electricity at Work Regulations 1989, the IEE Regulations and other applicable regulations, British Standards, Codes of Practice and HSE Guidance.

Competence

It is essential that any person, be they employee or sub-contractor, engaged in any work on or near an electrical system will have sufficient technical knowledge and experience to carry out the work. Technical knowledge or experience is defined as:

- Adequate knowledge of electricity
- Adequate experience of electrical work
- Adequate understanding of the systems to be worked on and practical experience on that class of system
- An understanding of the hazards which may arise during the work and the precautions that need to be taken to deal with them
- Knowledge of current electrical standards necessary for the work in hand, and the company policy.
- The ability to recognise, at all times, whether it is safe for work to continue

The depot manager responsible for the work is responsible for ensuring that persons are competent to perform and/or supervise the task.

Inspections and Testing

All installations, whether permanent or temporary, fixed equipment and portable electric tools must be inspected and tested at intervals stated or recommended in the regulations. The results of such inspections and testing will be recorded on the company maintenance log.

All electrical test equipment used by employees will conform to HSE Guidance note GS38.

The company will appoint a competent person for carrying out inspections and testing annually on all company owned portable electric tools and recording the results on the company maintenance log. The competent person will be authorised to carry out repairs or alterations to company owned portable electrical equipment.

The inspections and testing of fixed electrical installations, either permanent or temporary, will be undertaken by a competent electrician every five years.

All employees operating portable electrical equipment will do so in accordance with the information, instruction and training that has been provided. They are to carry out daily visual inspections only and report any defects to their manager so that immediate arrangements can be made to have the defects rectified. Any identified equipment with a defect is not to be used.

The majority of the company work equipment including presses, grinders and tyre cutters are 230v. Suitable RCD's are used on all extension leads and are checked regularly to ensure they remain in good working order.

Management are responsible for ensuring that any employee who operates portable electrical

equipment have received adequate safety training and/or instruction on the safe use of the equipment.

Immediate action will be taken by the MD against any employee or contractor who abuses or incorrectly uses electrical equipment at the depots or other work places.

3.13. EMERGENCY EVACUATION PROCEDURE

In the event of the fire alarm being activated, or in any other emergency situation, all employees must leave the building or work premises by the nearest available exit and assemble at the designated assembly point.

The designated assembly points will be explained during inductions and will be clearly signed.

Practice fire drills will be conducted every twelve months to ensure employee familiarity with emergency evacuation procedures, these will be recorded in the fire logs kept at each depot.

A general fire action/precautions notice is displayed and provides a constant reminder of fire precaution procedures.

3.14. FIRE SAFETY

It is the policy of Fit to comply with the law as set out in the Regulatory Reform (Fire Safety) Order 2005.

The 'responsible person', as defined under the order, shall be: Mr Edward Woolley

The 'competent person', as defined under the order, shall be: TBC

To comply with the Regulatory Reform (Fire Safety) Order 2005 the company shall:

- Appoint one or more persons per depot to carry out the preventative and protective measures required by the order and to be responsible recording drills, testing and maintenance of fire related equipment in the fire log.
- Carry out a fire risk assessment at each depot, excluding containers; this must be completed by a person with experience and knowledge of the Regulatory Reform (Fire Safety) Order. The assessments must be reviewed and updated at least annually.
- Provide employees with clear and relevant information on the risks to them as identified within the fire risk assessment and the measures that have been taken to prevent fires, and how these measures will protect them if a fire breaks out.
- Provide formal fire safety training for all employees, during their normal working hours, and from time to time throughout their period of work.
- Inform non-employees, such as temporary or contract workers, of the relevant risks to them and provide them with information about who are the competent persons and about fire procedures for the depot premises or site.
- Establish a suitable means of contacting the emergency services and provide them with any relevant information about dangerous substances (*this is limited and minimal at each depot*).

Safe systems will be maintained to prevent the outbreak and spread of fire and aid speedy evacuation in an emergency.

All employees have a duty to conduct their operations in such a way as to minimise the risk of fire. This involves taking care when smoking, keeping combustible materials separate from sources of ignition and avoiding unnecessary accumulation of combustible materials.

Depot Managers are responsible for keeping their operating areas safe from fire and ensuring that staff are trained in proper fire prevention practices and emergency procedures.

3.15. FIRST AID

Our duty to provide first aid at work is governed by the Health and Safety (First Aid) Regulations 1981 (as amended). These require us to carry out a risk assessment in order to determine what first aid facilities and personnel are necessary to meet the needs of our business. We are also required to review this assessment periodically to ensure that current provision is adequate. In order to comply with these regulations, our assessment has considered a number of factors, including the following:

- size of the business
- type of business
- building layout
- past history of accidents
- proximity of business location to emergency medical services
- needs of travelling and/or lone workers
- first aid cover in times of sickness or annual leave.

All Depot Managers and persons Working Alone are Emergency First Aid Trained as well as one member of administration staff at HO.

First Aid boxes are easily accessible by all employees including Lone workers (in vehicles) and shall be checked on a monthly basis to ensure that sufficient supplies are available in the box..

Procedures

The following are general first aid-related procedures to be followed by all staff:

- if you are aware that an employee has been taken ill, or has had an accident, call your manager for assistance. You should not attempt to give first aid treatment yourself unless you have had the training to do so.
- no employee should use their private car to transport a casualty to hospital. If an ambulance is not required, then a taxi is to be used.
- do not remove first aid equipment from its designated place which has visible signage.
- any loss or damage to first aid equipment or it is poorly stocked report it to your manager.
- all lorry/van drivers are expected to carry a first aid kit with them at all times. They are responsible for its safe-keeping and to keep it adequately stocked.

Responsibilities of first aid personnel

In order to carry out their duties effectively, first aid personnel have the following duties and responsibilities.

Emergency First Aiders are responsible for:

- taking charge when a person has been injured or falls ill
- calling an ambulance where necessary.

First Aid Boxes

First-aid boxes will be provided within each depot to ensure there are adequate supplies for the nature of the hazards involved. All boxes will contain at least the minimum supplies suggested by L74: First Aid at Work. Approved Code of Practice. Only specified first aid supplies will be kept. No creams, lotions or drugs, however seemingly mild, will be kept.

The location of first-aid boxes will be clearly indicated with signage.

Portable First-aid Kits

Portable first-aid kits will be available in vehicles for lone workers required to work away from the normal workplace, where access to facilities may be restricted.

Dealing with visitors

It is our policy to offer first aid assistance to visitors to our premises. Should a visitor feel unwell or have an accident, then the employee supervising their visit should call for the Emergency trained person.

If the visitor has had an accident, the Depot Managers are responsible for ensuring that an entry is made in the accident book, scanned and emailed to HO.

Staff training

All staff undertaking first aid duties will be given training in accordance with current legal requirements; this will be Emergency First Aid at Work.

The MD is responsible for reporting cases of accident and disease to the relevant enforcing authority under the RIDDOR 2013 Regulations where applicable.

A road accident whilst travelling to or from the employee's place of work shall also be reported and included in the accident statistics.

3.16 FORKLIFT TRUCKS

The Provision and Use of Work Equipment Regulations 1998 together with the Lifting Operations and Lifting Equipment Regulations 1998 give requirements for the safe use, provision, operation, maintenance and use of fork lift trucks and will be complied with. Health and Safety Executive Guidance Note HSG 6 Safety in working with lift trucks provides guidance and information on establishing safe systems of work for the use of this equipment.

Training will be provided for fork lift truck operators, with evidence of training available at the depot. Only qualified and authorised persons will be permitted to operate forklift trucks. Appropriate action will be taken by the MD/Depot Manager against any person who operates fork lift trucks without the appropriate training and authorisation and also where passengers are being carried in insecure positions.

The operator and Depot Manager will ensure that where applicable, chain test certificates are valid. (Fork raising and lowering chains).

Fork lift trucks are to be formally inspected on a monthly basis, the results recorded on the appropriate tick sheet which must be scanned and emailed or handed in to HO.

The main hazards are overturning trucks, instability of load and failure of truck due to poor maintenance. The following particular points must be complied with:

- The truck must not be overloaded in excess of the manufacturers loading tale.
- All loads must be transported securely and correct, well maintained pallets must be used.
- Trucks must be maintained and serviced in accordance with manufacturer's recommendations.

3.17. LIFTING OPERATIONS & LIFTING EQUIPMENT

It is the policy of Fit to comply with the law as set out in the Lifting Operations and Lifting Equipment Regulations 1998.

The requirements imposed by the Lifting Operations and Lifting Equipment Regulations 1998 on an employer in relation to lifting equipment apply to all lifting equipment provided for use or used by employees of his at work.

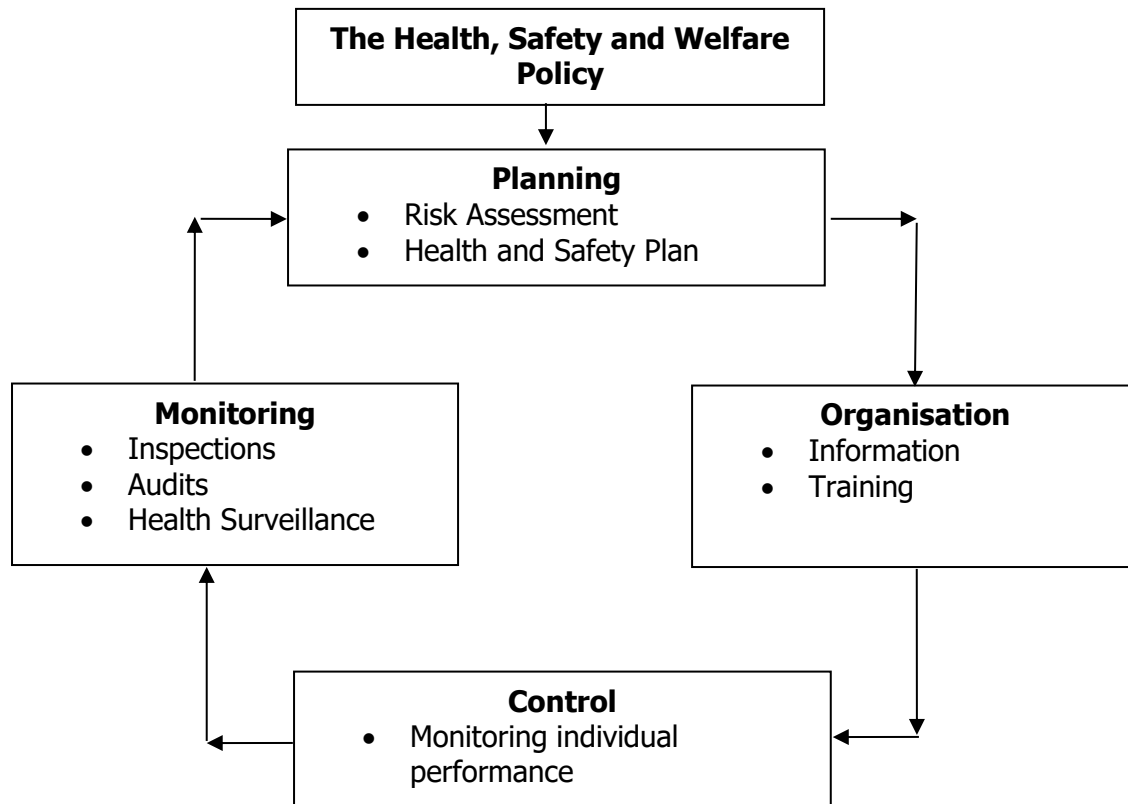
Therefore, in order to comply with the provisions of the regulations, management shall, so far as is reasonably practicable, ensure that:

- the lifting equipment is of adequate strength and suitability for each load and that every part of a load and anything attached thereto and used in the lifting is of adequate strength;
- machinery and accessories for lifting loads are clearly marked to indicate their safe working load;
- and where the safe working load of machinery for lifting depends on its configuration, either the machinery is clearly marked to indicate its safe working load for each configuration, or information which clearly indicates its safe working load for each configuration is kept with the machinery;
- that accessories for lifting are marked to identify the characteristics necessary for safe use;
- that lifting equipment not designed for lifting persons which might be mistakenly used for that purpose, is clearly marked prohibiting such use;
- any lifting or lowering operation which involves lifting equipment is properly planned by a competent person, appropriately supervised and carried out in a safe manner;
- before lifting equipment is put into service for the first time that it is thoroughly examined for any defect; (Certain exceptions are defined under Reg 9 of the regulations)
- equipment in exposed conditions that may be subject to deterioration is thoroughly examined:
 - at least every twelve months, in the case of other lifting equipment; or
 - in either case, in accordance with an examination scheme; and
 - whenever exceptional circumstances have occurred which are liable to jeopardise the safety of the lifting equipment, and
 - if appropriate for the purpose, is inspected by a competent person at suitable intervals between thorough examinations,
 - upon examination, any defects are immediately reported in the prescribed manner and a written report prepared detailing the defects and the potential risks arising there from;
- any equipment reported as defective is not used until such defect(s) are rectified and tested to ensure the equipment is safe for the intended use;
- records of examination and defects reports are kept available for examination until the presentation of subsequent reports or the equipment is taken out of use.
- only suitably trained persons will be allowed to undertake repairs, modifications, maintenance or servicing to any equipment
- appropriate information, instruction and training are given to operatives deployed to use the equipment;

3.18. MANAGEMENT OF HEALTH AND SAFETY AT WORK

It is the policy of Fit to comply with the law as set out in the Management of Health and Safety at Work Regulations 1999.

The following outlines our arrangements for the effective planning, organising, control, monitoring and review of the preventative and protective measures put in place to ensure the management and control of health and safety within our organisation.



The Health, safety and welfare policy outlines the company commitment to provide a working environment that minimises the risk of injuries and illness together with reducing the potential for loss or damage to work equipment, buildings and materials. The policy will be reviewed and revised as necessary, particularly when changes in the scale and nature of our operations arise and when changes in legislation occur.

Planning of all our activities will take into account a systematic approach to the completion of risk assessments. The priority of management is to eliminate risk through the selection and design of facilities, equipment and work methods to provide safe systems of work.

The general principle of prevention will be:

- Avoiding the risks wherever practicable;
- Evaluating the risks which cannot be avoided;
- Combating the risk at source;
- Adapting the work to the individual, especially with regard to the design of workplaces, the choice of work equipment and the choice of working and production methods, with a view, in particular, to alleviating monotonous work and reducing the effect on employees health;
- Adapting to technical progress;
- Replacing the dangerous by the non-dangerous or less dangerous;
- Developing a coherent overall prevention policy that covers technology, organisation of work, working conditions, social relationships and the influence of factors relating to the working environment;

- Giving collective protective measures priority over individual protective measures; and
- Giving appropriate information, instruction, training and supervision to employees.

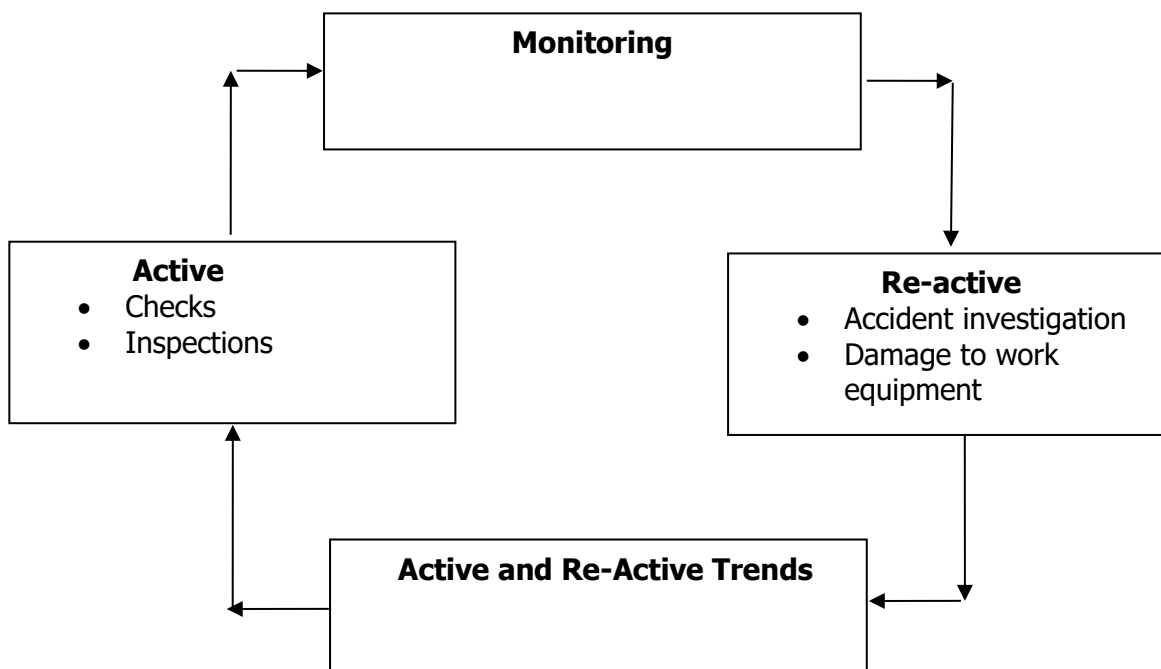
Organisation; Employees and their representatives will be involved in the risk assessment process through consultation. Procedures will be implemented through the provision of information, instruction, training and supervision to employees

Control; All employees will have their health and safety responsibilities clearly identified in section 2 of the company Health, safety and welfare policy and employees will be made fully aware of these during their health and safety induction training and through the issue of the policy document. The performance of management staff will be monitored and reviewed on a regular basis taking into account good health and safety performance together with identification of where improvements are required. This will be undertaken by senior managers of the company.

Monitoring; Our health and safety performance will be monitored by the undertaking of the following:

- Daily visual inspections by depot managers
- Recorded inspections by depot managers and the H&S Consultant
- Monthly monitoring where requested by the organisation
- Annual reviews where requested by the organisation
- External audits where requested by the organisation.

Refer to flow chart below:



Review; On an annual basis a review will be undertaken of the whole of the management system to include the elements of planning, organisation, control and monitoring to ensure the system remains effective.

3.19. MANUAL HANDLING OPERATIONS

It is the policy of Fit to comply with the law as set out in the Manual Handling Operations Regulations 2002, as amended.

Manual handling operations will be avoided as far as is reasonably practicable.

Invariably the Company's activities ask for a number of tasks to involve manual handling e.g. manoeuvring of large vehicle tyres and equipment, the Company recognises that it has a duty to provide all operatives with the best mechanical means and best working practices as is reasonably practical.

All aspects of manual handling involved in the Company's operations shall be examined, including any areas where pushing, pulling, lifting, carrying, supporting, etc, are part of the expected work.

Manual handling assessments shall be suitably documented. The findings of all assessments and the control measures to be adopted shall be fully communicated to the respective employees via the information, instruction and training aspects of the business's operations.

Where the manual handling assessments identify any residual risk involving any unavoidable manual handling operations being conducted then as well as employees receiving information they will also receive additional and specific bespoke training in safe lifting techniques i.e. The Kinetic Method.

Depot Managers shall:

Avoid the need for manual handling operations when planning and organising the work and where this is not possible:

- ensure that an assessment of all significant risks are undertaken and suitable safe working practices devised and communicated to those employees affected. Generic control procedures will also be established and communicated to employees.
- ensure that suitable tailored training is provided to all employees required to control or undertake manual handling operations.
- Assess all manual handling operations. Materials and equipment etc. where possible, will be handled by mechanical means, where this is not possible adequate labour will be made available to handle difficult or heavy loads, for which appropriate handling instructions will be given by the Depot Managers.
- ensure that personnel involved in manual handling are physically able and competent to undertake the work and are issued with and utilise suitable protective equipment in their undertaking.

All possible steps will be taken to reduce the risk of injury to the lowest level possible.

3.20 MOBILE PHONES

The Use of Mobile Phones in Moving Vehicles whilst on Company Business.

With effect from 1st December 2003, in addition to the obligation upon a driver to maintain full control of his vehicle (under which the Police have previously prosecuted drivers for using hand held mobile phones), it becomes a specific offence under an amendment to the Road Vehicles (Construction and Use) Regulations 1986 to use a hand held mobile phone whilst driving.

In consequence, Fit has a formal policy on the use of mobile phones in moving vehicles whilst on Company business.

This Policy applies with immediate effect and is as follows:

Employees shall not use mobile phones to either make or receive calls whilst driving any motor vehicle unless the vehicle is fitted with an appropriate hands free kit that holds the phone in a cradle and does not rely upon a clip on earpiece and/or microphone.

If it is necessary for a driver to make or receive a call in a vehicle that is not fitted with an appropriate hands free kit he must park safely and turn off the vehicle's engine before doing so. In no circumstances should a call be made or received by a driver who is holding a phone whilst in a moving vehicle.

Even when the vehicle is fitted with an appropriate hands free kit employees should where possible restrict the use of the phone to receiving incoming calls and should neither make nor accept calls in circumstances where driving conditions are difficult and/or require their full concentration.

It is strongly recommended that even where an appropriate hands free kit is fitted the driver should park safely and turn off the vehicle's engine before making or receiving calls. In any event, if the call is likely to be of a difficult nature and will require the full attention of the driver he must pull over and park safely before making, receiving or continuing with the call.

Fit will under no circumstances reimburse any fines that may be levied in relation to an offence under these regulations.

Drivers should also be aware of the following:

The fines for breaching the regulations range between £30 and £1,000 for drivers of private cars and increase to a maximum of £2,500 for drivers of commercial vehicles,

In addition to any fines that may be imposed under the regulations the Government has introduced new legislation making a breach of the regulations an endorsable offence that could result in the loss of their driving licence.

Even where an appropriate hands free kit is fitted the Police can prosecute a driver if they feel that he is not in full control of the vehicle. If there is an incident, the use of a mobile phone or similar device may justify more serious charges, for example careless or dangerous driving.

3.21. NOISE AT WORK

It is the policy of Fit to comply with the law as set out in the Noise at Work Regulations 2005

The Control of Noise at Work Regulations 2005 impose a duty on employers to "prevent or reduce the risks to health and safety from exposure to noise at work" of employees, arising from excessive levels of noise in the workplace. Employees at Fit do not experience over exposure to noise, however below is information relating to noise which highlights the potential risks to health.

Risks associated with noise at work include:

- reduced hearing and /or deafness;
- tinnitus;
- not hearing instructions;
- not hearing emergency alarms.

Depot Managers shall ensure that:

- Action is taken to eliminate or reduce exposure that produces risks;
- Where the risk to exposure cannot be adequately reduced then personnel are provided with hearing protection;
- Systems of management are implemented that the legal limits on noise exposure are not exceeded;
- That suitable information and instruction is provided to personnel to enable them to conform to the recommended working practices;

The Control of Noise at Work Regulations 2005 requires specification action to be taken at prescribed action values. These relate to:

- the levels of exposure to noise of personnel averaged over a working day or week: and
- the maximum noise (peak sound pressure) to which personnel are exposed in a working day;

'Lower Exposure Action Values'

- daily or weekly exposure of 80dB(A)
- peak sound pressure of 135 dB(C)(C)

Where exposure is between the lower and upper '*exposure action values*' employees will be advised of the situation and suitable hearing protectors made available for their use.

'Upper Exposure Action Values'

- daily or weekly exposure of 85 dB(A);
- peak sound pressure of 137 dB(C)

Where exposure is at or above the *upper exposure action value* hearing protectors will be provided to employees which must be worn whilst undertaking the relevant activity.

'Exposure Limit Values '

- daily or weekly exposure of 87 dB(A)
- Peak sound pressure of 140 dB(C)

These levels of noise exposure MUST NOT be exceeded

3.22. OFFICE SAFETY AND DISPLAY SCREEN EQUIPMENT INCLUDING LAPTOPS

It is the policy of Fit to comply with the laws as set out in The Management of Health and Safety at Work Regulations 1999, The Workplace (Health, Safety & Welfare) Regulations 1992, The Health and Safety (Display Screen Equipment) Regulations 1992, The Regulatory Reform (Fire Safety) Order 2005 and The Health & Safety (First Aid) Regulations 1981.

The Company has seven depots with two sub-depots across the country. Each depot has display screen equipment, some of which are laptops. Employees use DSE equipment on a regular basis.

WHSWR requires acceptable conditions to be provided to employees relating to a wide range of topics. These include ventilation, temperature, lighting, cleanliness, space in which to work, and rest and hygiene facilities.

It is Fit policy to ensure that employees have satisfactory working conditions. The requirements of the Regulations will be met or exceeded in order to provide a workplace which offers a high standard of comfort and welfare to all employees.

Minor accidents in the workplace are frequently the result of poor housekeeping and untidiness. The workplace will be maintained in a clean and tidy condition in order to minimise the risk of such occurrences.

Monthly work place inspections by Depot Managers will be undertaken to ensure that a safe working and clean environment is provided at all times. These inspection tick sheet reports will be scanned and emailed or handed in at HO on a monthly basis.

Waste materials including food waste will be removed on a daily basis to ensure good hygiene standards and the risk of fire are reduced as far as is reasonably practicable. Welfare facilities shall be maintained in good condition, regularly cleaned and controlled at a satisfactory temperature and kept well stocked with hand washing and drying materials.

The requirements of the above regulations will be made known to all staff. All employees will be encouraged to make pertinent suggestions as to the safe use of such facilities and will be required to keep them clean at all times. No materials are to be stored in the welfare facilities. Those who desire to smoke must do so only in the designated smoking areas.

The term “display screen equipment” refers to any alphanumeric or graphic display screen. In practice at Fit, the Regulations apply to the use of desktop computers and laptops.

The Regulations apply to people who habitually use display screen equipment for prolonged periods of time. Such people are classified by the Regulations as "users". Employees are encouraged to vary their work and take breaks in order to avoid long spells of intensive screen work.

Appropriate measures will be taken as required by the Regulations including:

- Assessment of workstations including laptops and application of control measures if required;
- Eyesight tests to be provided to employees on request;
- Adequate information will be provided.

The Company will pay for regular eyesight tests for staff that use display screen equipment for prolonged periods throughout the day and have concerns about their eyesight.

Procedure

- Request an authorisation note from your Depot Manager.
- Produce a VAT invoice and the Company will pay for the eye test.
- If spectacles are required: the Company will supply one pair of suitable spectacles at the cheapest price prevailing at the time from an optician of their choice. Should staff prefer more expensive spectacles; the additional cost will be paid by them.

3.23. WORKING ALONE (EMPLOYEES WHO SPEND MUCH OF THEIR WORKING DAY IN THE WORK VEHICLE/OR WORKING OUT OF THE WORK VEHICLE TO CARRY OUT THEIR TASKS)

The company will ensure, so far as is reasonably practicable, that employees who are required to work alone or unsupervised for significant periods of time are protected from risks to their health and safety.

Every mobile worker has a company mobile phone which can be used for communicating with their manager and for use in the event of an emergency. The controller of the employee working alone has a record of where and what time they should be at any point during the day.

It is rare for a Fit employee to be completely alone whilst working as there are generally other persons present nearby on the site or workplace. Solitary working exposes employees and others to certain hazards. The company's intention is either to entirely remove the risks from these hazards or, where complete elimination is not possible, to reduce them to an acceptable level.

The person responsible for the implementation of this policy is the MD and Depot Managers, the co-operation of management and employees is essential to its success.

3.24. PERSONAL PROTECTIVE EQUIPMENT (PPE)

It is the policy of Fit to comply with the law as set out in the Personal Protective Equipment at Work Regulations 1992, as amended.

All workers who may be exposed to a risk to their health and safety while at work will be provided with suitable, properly fitting and effective personal protective equipment (as indicated by the risk assessment findings)

All personal protective equipment provided by Fit will be properly assessed by management prior to its provision. All personal protective equipment will be issued free of charge. All personal protective equipment provided by Fit will be maintained in good working order.

All workers provided with personal protective equipment by Fit will receive training and information on the use where required, maintenance and purpose of the equipment.

Fit will endeavour to ensure that all personal protective equipment provided is used and used properly by its employees. All employees are expected to comply with their duties under section 7 of the Health and Safety at Work etc Act at all times. In particular, we expect them to follow any safe systems of work and rules that we may introduce to protect their health and safety. If personal protective

equipment is issued to an employee following the undertaking of a risk assessment, it must be worn as required.

The employee will also be expected to take good care of the PPE and to use and maintain it in accordance with instructions provided. Any loss of PPE that has not been reported or failure to wear the PPE may be treated as a disciplinary offence.

3.25. RISK ASSESSMENTS

Risk assessments are regarded as useful tools which help us to prevent accidents and ill-health. For that reason, our goal is for these documents to be frequently reviewed and conducted with input from staff who are involved in the work being assessed.

It is the policy of Fit to comply with the law as set out in the Management of Health & Safety at Work Regulations 1999 and common regulations requiring risk assessment including: Control of Substances Hazardous to Health Regulations 2002, Control, of Noise at Work Regulations 2005, Manual Handling Operations Regulations 2002, Health and Safety (Display Screen Equipment) Regulations 1992, Personal Protective Equipment at Work Regulations 1992, Regulatory Reform (Fire Safety) Order 2005 and The Lifting Operations and Lifting Equipment Regulations 1998.

All activities that could reasonably be expected to cause harm shall be risk assessed. The risk assessment shall be carried out by the Depot Manager and with anyone involved in carrying out the task.

Generic risk assessments produced must be reviewed by management to ascertain whether they remain suitable and sufficient for the works to be carried out. Should additional hazards and associated risks be identified for the proposed works, management must complete a further assessment addressing and controlling these hazards.

The risk assessment is a careful examination of what, in the workplace, could cause harm to people (this could be: company employees, people who may not be in the workplace all the time e.g. Cleaners, visitors, contractors, maintenance personnel; persons potentially affected by the work e.g. Members of the public) so that we weigh up whether we have taken enough steps to prevent harm or do we need to do more.

The aim is to make sure a work activity does not injure or make anyone ill.

The risk assessment undertaken by the company will follow the HSE principals of '5 Steps to Risk Assessment'

1. Identify the hazards
2. Identify who might be harmed
3. Evaluate the risks from the identified hazards
4. Record the findings on the company Risk Assessment form
5. Review and revise the risk assessment.

Assessments shall be reviewed if there is reason to suspect that it is no longer valid, or there has been a significant change in the matter to which it relates. Once a year the assessments shall be reviewed to check their validity. Where risk assessments identify an action plan a timescale will be written down for implementation.

A hazard is defined as 'Anything with the potential to cause harm' (e.g. Electricity, Chemicals, Work at height, etc).

A risk is defined as 'The chance, great or small, that someone will be harmed by the hazard'.

Copies of risk assessments shall be issued to all those affected and a briefing given on those findings. Once read and understood those individuals shall sign the risk assessment instruction declaring they have read and understood its contents.

Details of non-normal risks such as fire, evacuation, etc are recorded on their own risk assessment form, e.g.; Fire Risk Assessment / Fire Log book.

Where risk assessments identify medium to high risk activities a safety method statement is to be produced and detail the specific safe working practices to be followed. The contents of the method statement is to be fully explained to the respective workers before any work is to commence, with a briefing register signed by those in attendance to acknowledge the system of work has been understood.

Principals of Prevention

The principles of prevention that will be applied by management to control risks identified by the risk assessment are as follows:

1. Avoid the risk altogether, e.g.: do the work in a different way taking care not to introduce new hazards
2. Evaluate the risks that cannot be avoided by carrying out a risk assessment
3. Combat the risk at source, e.g.: if steps are slippery, treating or replacing them is better than displaying a warning sign
4. Adapt work to the requirements of the individual. Consult with employees who will be affected when selecting work equipment and PPE and devise safe working procedures.
5. Implement risk prevention measures to form part of a coherent policy and approach
6. Give priority to collective protective measures priority over individual protection
7. Ensure that all workers understand what they must do

3.26. SMOKING

The company shall comply with the requirements of the Health Act 2006 and Smoke-free (Premises and Enforcement) Regulations.

Smoking is prohibited in all areas of the workplace except those areas, which have been specifically designated as smoking areas. Smoking areas should at all times be kept fire safe.

Smoking is strictly prohibited in Company vehicles at any time.

All cigarettes must be fully extinguished and placed in the sand buckets/enclosed ash trays provided when finished with, and not thrown on the floor. Combustible materials must never be stored or allowed to accumulate in areas where smoking is permitted.

3.27. THE WORKING TIME REGULATIONS

The Working Time Regulations 1998, as amended, were brought into force to ensure the basic rights of workers.

These regulations provide:

A limit of an average of 48 hours a week which a worker can be required to work (though workers can choose to work more if they want to)

A right to 11 hours rest a day (in each 24 hr period during which he works for his employer)

A right to a day off each week

A right to an in-work rest break if the working day is longer than six hours

A right to four weeks paid leave per year.

In order for Fit to comply with the Regulations, a record of each employee's hours are required, showing the number of hours worked per day. This is recorded on respective timesheets.

3.28. VEHICLE DRIVERS RESPONSIBILITIES

Any person that drives a vehicle that is owned or rented/leased by the company has a responsibility to:

- Ensure that the vehicle he is responsible for is operated in such a manner that it does not pose unacceptable dangers to any person.
- Complete the check tick sheet for the vehicle and scan and email or hand in at HO monthly
- The vehicle driver must ensure that any routine maintenance necessary has been carried out before using the vehicle
- Report any defects at the earliest opportunity and not use any vehicle that is deemed unsafe or un-roadworthy
- Operate the vehicle within the traffic regulations
- Do not drive whilst under the influence of alcohol or drugs. In the case of medication prescribed, the driver must check with their G.P. that they are able to drive
- If driving hours are excessive and the driver is suffering from tiredness the driver should stop and have rest breaks.
- Do not smoke in the work vehicle.
- Pay fixed penalty fines incurred whilst in control of a company vehicle.
- Do not drive whilst using a hand held mobile phone.

3.29. WELFARE

It is the policy of Fit to comply with the provisions of the Workplace (health, safety and welfare) Regulations 1992

Appropriate washroom and toilet facilities are made available at all depots, as are drinking facilities.

Where employees are working away from the depots, arrangements will be made to ensure facilities are available. Arrangements should be in place to regularly clean and maintain sanitary and washing facilities.

Employees, contractors and visitors must ensure that facilities are left in a clean and tidy order after use. Any defects must be reported to management immediately.

3.30. WORK EQUIPMENT

It is the policy of Fit to comply with Section 2 of the Health and Safety at Work etc Act 1974 and the Provision and Use of Work Equipment Regulations 1998.

Suitability of work equipment

Management is responsible for ensuring all plant, equipment and machinery provided for use is safe and suitable for the purpose for which it is used. This requirement shall also apply to any equipment hired; the hiring of equipment will be from reputable hire companies only.

Maintenance & Inspection

All work equipment is maintained by a suitably qualified employee appointed by the company. They are required to undertake formal visual inspections monthly and record the findings on the appropriate tick sheet. Testing and maintenance of company owned equipment will be in accordance with the manufacturer's recommendations and statutory requirements.

All new equipment will be inspected and tested before being put into service for the first time, after installation or after assembly at new site or in new location, to ensure that it has been installed correctly and is safe to operate.

Each item of company owned equipment will be uniquely marked and/or display an inspection label detailing date of last inspection/test and date of next retest/inspection where applicable.

Operators of the work equipment are responsible for carrying out daily visual checks to ascertain the equipment is in good working order and safe to use. Operators are responsible for reporting any defective equipment immediately to their manager. Any identified defective equipment must not be used.

Specific Risks

Management will ensure that, wherever possible, risks from work equipment are always controlled by (in the order given)

- Eliminating the risk, or if not possible;
- Take physical measures to control the risks such as the provision of guards; if risks cannot be adequately controlled;
- Take appropriate measures to deal with residual risks, such as devising safe systems of work, following the requirements of the SSW and provide information, instruction and training to operators of the work equipment. Only operators authorised by management can carry out the task.

Information & Instructions

Depot Managers shall ensure that operators of work equipment have available to them adequate health and safety information and, where appropriate, written instructions pertaining to the use of the equipment and that they fully understand it.

Information to be provided can include:

- Manuals
- Instruction sheets
- Warning labels
- Training manuals
- Instructions from training courses if applicable
- Fit011 form/assessment sheet

Training

Depot Managers who have had the Continental Tyre Fitting training are to ensure that any person who uses work equipment relating to tyre fitting have received adequate training passed down from them in the methods that have to be adopted when using the equipment.

Depot Managers must ensure that the competence of the users of work equipment has been evaluated on form Fit011 and make arrangements to train the employee when a shortfall has been identified.

Abrasive wheel training is required for all persons who uses such equipment especially those responsible for changing wheels/blades on the equipment.

Persons under the age of 18 will not be permitted to use abrasive wheels or similar.

Dangerous parts of machinery

Depot Managers shall ensure that a suitable and sufficient risk assessment has been undertaken for work equipment so that hazards have been identified and suitable measures put in place to reduce risks, this is to include risks from noise and vibration

Depot Managers are to ensure that effective measures have been taken to prevent access to dangerous parts of machinery or the movement from the machinery stopped before any part of a person enters a danger zone.

The levels of protection include; (in the order given)

- Fixed enclosing guards
- Other guards or protection devices such as interlocked guards
- The provision of information, instruction, training and supervision

Controls

Each control on work equipment used by the company will be easily identifiable, detail what it does and on which equipment it takes effect. Controls and markings will be clearly visible.

All work equipment will be clearly marked with health and safety warnings where appropriate.

Isolation from sources of energy

Wherever appropriate work equipment will be provided with suitable means to isolate it from all sources of energy. This can be as simple as removing a plug from the electrical supply socket when inspection, service or maintenance is required.

Equipment Purchasing

Depot Managers are responsible for investigating purchase of new safer tools for use at work.

- When ordering equipment on behalf of the company, management will ensure that they are the most suitable for the purpose for which they are intended, and so far as is reasonably practicable, are safe and without risk when used in accordance with the suppliers directions and the prescribed policy procedures.
- When considering the purchase of new equipment management shall, so far as is practicable, select equipment with low vibration and noise levels.
- Where equipment is outside the prescribed procedures, Management will confirm the need for a risk assessment to be carried out.
- Depot Managers will as part of the normal function of supply, obtain manufacturer's data sheets on all products and to make such information available to all relevant places of work to inform personnel.

3.31. WASTE MANAGEMENT

The Environmental Protection Act 1990

The Environmental Protection (Duty of Care) Regulations 1991

The Depot Managers will ensure that all waste is disposed of in line with the above legislation.

The Company shall fulfil its duties under the legislation by:

- *preventing anyone from dealing with its waste illegally*
- *preventing the escape of waste*
- *ensuring waste is only transferred to an authorised person*
- *ensuring that an accurate description of waste is provided when the waste is transferred, and a transfer note is completed.*

Suitable skips and disposal equipment shall be used to contain waste materials, and the waste shall be disposed of regularly. In adverse weather conditions, arrangements shall be put in place to prevent waste from blowing around or contaminating surroundings.

The Depot Managers shall be responsible for the systems and arrangements for the safe disposal of waste.

3.32. REVISION HISTORY

[illegible]