

Health & Safety Policy

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1. POLICY STATEMENT

Health and Safety Policy Statement

As a responsible employer, Phillips Direct Limited seeks through this document to carry out all statutory duties under the Health and Safety at Work etc. Act 1974, to prepare and keep revised a written statement of Health & Safety Policy, and bring this to the notice of all our employees. This general policy statement of health and safety is the commitment of this Company to comply with current UK health & safety at work legislation.

It is the responsibility of the Managing Director, together with management, to ensure that the working environment is safe and without significant risks to health & safety, and meets the appropriate statutory requirements. It is recognised that all employees have a vital role to play in the implementation and maintenance of the health & safety programme, for these premises and other locations where employees are at work.

Our Statement Of General Policy Is To:

- maintain safe and healthy working conditions;
- prevent accidents and cases of work-related ill health;
- ensure all employees are competent to undertake their tasks and to give them adequate training;
- provide sufficient information, instruction, training and supervision for all employees and trainees;
- ensure the safe handling, use and control of hazardous / dangerous substances;
- provide and maintain safe plant and work equipment;
- consult with employees on matters affecting their health and safety at work;
- provide adequate control of the health and safety risks arising from our work activities.

This Policy document will be reviewed and revised at regular intervals, with those changes brought to the notice of all our employees.

Signed by:

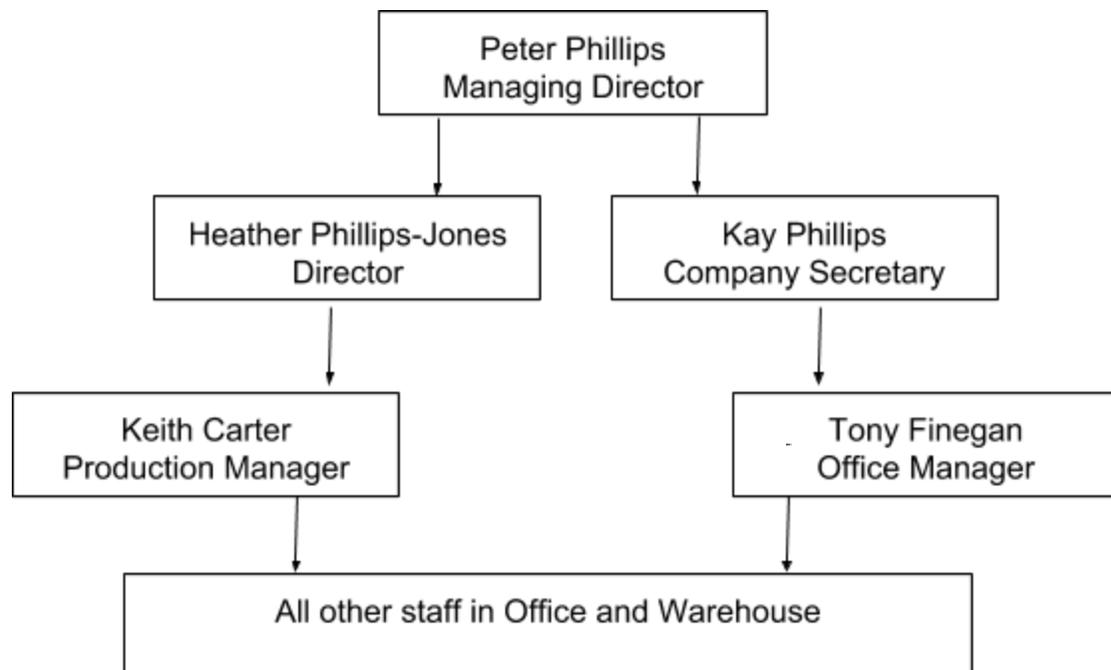
Director

Date:

For and on behalf of:
Phillips Direct Limited

2. ORGANISATION

Chain Of Command for Health and Safety Management



Responsibilities of the Board of Directors

Action Points

The Board recognises that it needs to accept formally and publicly its collective role in providing health & safety leadership in this organisation.

Each member of the Board has to accept their individual role in providing health & safety leadership for this organisation.

The Board shall ensure that all decisions reflect its health & safety intentions, as articulated in this Health & Safety Policy statement.

The Board recognises its role in engaging the active participation of employees in improving health & safety.

The Board shall ensure that it is kept informed of and alerted to, relevant health & safety risk management issues.

The Board shall:

- formally review health & safety performance (at least annually);
- ensure that the Health & Safety Policy statement reflects current Board priorities;
- ensure that our management systems provide for effective monitoring and reporting of health & safety performance;
- be kept informed about any significant health and safety failures, and of the outcome of the investigations into the causes;
- ensure that the Board address the health & safety implications of all its decisions; and
- ensure that health & safety risk management systems are in place and remain effective.

Responsibilities of Management, Supervisors & Employees

Overall and final responsibility for health & safety at work in this Company is that of Peter Phillips, Managing Director. However, in practice, the performance of certain strategic duties has to be jointly held and / or delegated. Therefore, day-to-day duties for ensuring that the Health & Safety Policy / safe working practices / safe systems of work, are implemented in the workplace premises, is that of Keith Carter, Production Manager, and Kay Phillips, Company Secretary.

The Company is responsible for consideration of health, safety and welfare issues in relation to the following workplaces premises / locations / areas of activity:

- the design and manufacture of packaging and promotional solutions.
- Working areas are the offices and warehouse sites.

Additionally, all employees of Phillips Direct Ltd. have a legal responsibility to co-operate with the Company's supervisors and managers to achieve a safe workplace without risks to health.

The indicated persons hold specific performance duties in relation to the following matters:

Health & Safety training:

- Keith Carter, Production Manager (warehouse)
- Peter Phillips, Managing Director (office employees).

Those involved with the carrying out of health & safety examinations and inspections are:

- H. M. Inspector of Factories from the Health & Safety Executive (HSE)
- the Local Fire Officer
- the Employers' Liability Insurance Engineer Surveyor (Zurich)
- Advisors from the Employment Medical Advisory Service (part of the HSE), and
- BPIF

The employees involved with investigating any accidents within the Company to employees is Keith Carter, Production Manager and/or Kay Phillips, Company Secretary or Peter Phillips, MD

There might be other employees involved with the basic maintenance of equipment which they are familiar with and use on a regular basis.

The employee who takes care of technical information relating to machinery and work equipment is Kay Phillips, Company Secretary.

The person responsible for the safe keeping of health, safety and fire safety documentation is Kay Phillips, Company Secretary.

All employees must also take reasonable care of themselves and others who might be affected by their activities.

Duties of Employees working at Phillips Direct Limited

All employees have responsibilities and duties under health and safety laws.

Section 7 of the Health and Safety at Work etc. Act 1974 states:

'It shall be the duty of every employee while at work-

- (a) to take reasonable care for the health and safety of himself and of other persons who may be affected by his acts or omissions at work; and***
- (b) as regards any duty or requirement imposed on his employer or any other person by or under any of the relevant statutory provisions, to co-operate with him so far as is necessary to enable that duty or requirement to be performed or complied with'.***

Section 8 states:

'No person shall intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety and welfare in pursuance of any the relevant statutory provisions'.

Duties of Employees, continued

Regulation 14 (1) of the Management of Health and Safety at Work Regulations states:

'Every employee shall use any machinery, equipment, dangerous substance, transport equipment, means of production or safety device ... in accordance both with any training in the use of the equipment ... and the instructions ... which have been provided to him'

Regulation 14 (2) states:

'Every employee shall inform his employer or any other employee of that employer with specific responsibility for the health and safety of his fellow employees –

- (a) of any work situation which a person with...training and instruction would reasonably consider represented a serious and immediate danger to health and safety; and***
- (b) of any matter which a person with ... training and instruction would reasonably consider represented a shortcoming in the employer's protection arrangements for health and safety...'***

Unsatisfactory Health & Safety Conduct And Gross Misconduct

Failure to comply with health and safety duties, legal requirements, and safe systems of work and work rules, on the part of any employee, and an attitude of non co-operation with their employer, can lead to disciplinary action. Health and safety breaches, which endanger the life of any person, or which create a risk of major injury will be classified as gross misconduct making the employee liable to dismissal.

Gross Misconduct

Note. An employee will be liable to summary dismissal if he/she is found to have acted in one of the following ways:

- unauthorised removal, misuse of, or interference with any guard or protective / protection device;
- unauthorised operation of any item of plant or work equipment;
- unauthorised entry into confined spaces;
- wilful damage to, misuse of, or interference with, any item provided in the interests of health and safety or welfare at work;
- unauthorised and intentional removal of any warning sign, notice or other signage provided by their employer in the interest of health and safety at work;
- the misuse of chemicals, inflammables or toxic substances;
- the misuse of any item of safety equipment, fittings, fixtures, components, or mechanical plant;
- the use of any type of fork lift truck, other mobile plant, or mobile elevated working platform, without training and authorisation.

This list is not exhaustive

Health and Safety Rules: All Employees

Accidents and Occupational Health

All employees must:

- Notify their immediate supervisor of any accident, near miss incident, or case of illness, which caused or could have led to personal injury, or property damage.
- Report any dangerous occurrences or near miss incidents to management without delay and to be available as a witness.
- Seek medical treatment from the trained first aider/s, for any injury sustained and ensure this is recorded in the Accident Book, B.I. 510.
- Report to their supervisor any medical condition that could affect their wellbeing as well as the health of other persons.
- Co-operate with their employer to enable implementation of occupational health and medical programmes.

Controls for Hazardous Substances

No potentially hazardous substances used on these premises

Electrical Safety

All employees must:

- Keep electrical equipment, plugs and leads in a good state of repair.
- Report all faults without delay to their immediate supervisor.
- Not attempt to carry out any repairs on electrical equipment unless qualified to do so.

Fire Precautions and Emergency Situations

All employees must:

- Store highly flammable and flammable liquids in the correct manner.
- Not obstruct any fire doors, fire exits, fire route ways, aisles, stairways, corridors or extinguishing equipment.
- Obey smoking restrictions at work.
- Report any defect associated with equipment or if it has been necessary to discharge extinguishing equipment.
- Follow the laid down emergency procedures including fire safety arrangements.
- Stop work and any running machinery and proceed to a place of safety in the event of being exposed to serious and imminent danger.
- Never leave stock or other equipment about the premises in any way, which might cause a hazard.
- Make themselves aware of the position of fire exits, water points and extinguishers, and understand the wording of the operating instructions.
- In the event of a fire, assemble in the external area away from the building and any potential hazards. Do not attempt to re-enter the building.

Lifting Equipment

Employees must:

- Ensure that you are authorised and competent to use the lifting equipment safely.
- Always make sure that lifting accessories are in a safe condition and properly stored when not in use.
- Always ensure that lifting operations are planned before attempting them and ensure that the area is clear of personnel and obstructions.
- Always leave lifting equipment in a safe condition and properly parked to avoid injury risks.

Manual Handling

All employees must:

- Always adopt and carry out the best possible means of lifting.
- Receive assistance if they have doubt as to whether they are able to move the article or substance safely.
- Take extra care when moving objects up and down stairs or through doorways.
- Make sure they have clear vision when carrying bulky / large objects.
- Use mechanical lifting aids and devices provided.
- Report any defective handling equipment, and ensure equipment is not used until repaired.
- Wear protective clothing when carrying dangerous substances.
- Never sit or climb on any mobile equipment.

Personal Protective Equipment And Clothing

Employees must:

- Use all PPE provided in the correct manner, including respiratory protection, safety harnesses and rescue equipment.
- Store and maintain the PPE provided in accordance with training and instructions.
- Report any defects, damage, loss etc. to the PPE provided.
- Always wear safety footwear at work and eye protection when required.

Signs And Notices

Employees must

Observe and act upon any signs or notices displayed within the working environment.

Employees will need to be aware of the following types of signs and notices:

- Prohibition signs, e.g. *'No Entry'*
- Mandatory signs, e.g. *'Wear Eye Protection'*
- Warning and hazard signs, e.g. *'Danger- Work in Progress'*
- Safe condition signs, e.g. *'Fire Exit'*
- Signs relating to fire and emergency actions and notices informing of first aid arrangements
- The HSE placard *'Health and Safety Law - What you should know'*.

Systems of Safe Working

Employees must:

- Report to their immediate supervisor any defect, fault, damage or malfunction associated with the work equipment provided, and submit a formal defect report sheet where appropriate.
- Make proper use of any guarding arrangement designed to protect a danger zone.
- Observe all laid down systems for safe working or other safe operating procedures.
- Return any hazardous substances and any cleaning agents to the designated storage area at the end of the shift or working day.
- Use chemicals and substances in accordance with their initial training and information contained in the Product Data Sheets.
- Keep long hair tied back when using machinery.
- Ensure that loose clothing is kept fastened and away from machinery.

Employees must not:

- Operate work equipment provided for use without having received the necessary training and instructions, as well as the authorisation to do so.
- Clean any item of work equipment, which is in motion, which could give rise to danger.
- Leave work equipment unattended whilst in motion.
- When less than 18 years of age (a 'young person' for the purpose of health and safety law), shall not operate any dangerous work equipment, unless they have close supervision and have received the necessary training, following a suitable and sufficient assessment of risk.
- Carry out repairs, adjustments, modifications etc. unless they are competent to do so and have been so authorised.

Note. Technical information concerning the machinery you might have to use is kept with Kay Phillips, Company Secretary.

Transport

Employees must not:

- Drive or operate vehicles whilst unfit or unwell.
- Convey waste materials without proper 'Duty of Care' notification.
- Overload vehicles.
- Use vehicles for any unauthorised purposes.
- Drive or operate a vehicle should they not hold an appropriate class of driving licence or other permit.
- Operate a forklift truck, or similar moving mechanical plant, unless properly trained and authorised to do so.

Employees must:

- Carry out daily checks on their vehicles / Fork Lift Truck prior to use, in accordance with the recognised checking procedures provided by the manufacturer or other manuals.
- Use reversing hazard warning horns where fitted.
- Be aware of, understand and always follow the current requirements of the Highway Code.

Stock

Employees must:

- Stack goods evenly with heavier items at the bottom and lighter goods on top.
- Use proper ladder access to reach higher storage levels in safety.

Working Practices

Access

- Clear access ways must be maintained at all times.
- No designed fire exit door or fire pathway is to be blocked or otherwise obstructed.

Storage

- Stock should not be stacked in such a manner that it will necessitate persons to over - stretch.

Waste Disposal

- Waste materials etc. must not be left in such a position, where it will cause an obstruction or a fire hazard.
- Bins should not be over - filled.
- Bins should be emptied into the skip provided.
- Any waste that is defined as controlled waste must be placed in the appropriate container for disposal by waste carriers.
- Waste materials e.g. paper /rag wipes, contaminated with flammable liquid or similar solution must be deposited immediately after use within the designated fire resistant waste bin which, in turn, must be effectively lidded or otherwise suitably enclosed.

Work Environment

Employees must:

- Take all necessary protective measures to prevent pollution to the environment, e.g. by preventing chemicals entering sewers and watercourses.
- Maintain high standards of housekeeping throughout the premises.
- Leave waste materials and substances at the stipulated disposal point, in accordance with the waste management policy.
- Clean up any spillages without delay, following the correct procedure.
- Keep their working environment, associated stairways, landings and passageways, clear of obstructions and in a clean and tidy condition.
- Make full and proper use of all work equipment selected and provided for their use, in accordance with their training and instructions, to control risks in the workplace.
- Notify their immediate supervisor of any hazardous situation, without delay.

3. GENERAL ARRANGEMENTS

Accidents, First-Aid Arrangements and Work-Related Ill Health

The Company recognises the importance of having suitable and sufficient first-aid arrangements within the workplace. First-aid treatment can play a vital part when someone has been injured and may mean the difference between life and death.

First-aid box. The box is kept in the kitchen in the offices

All accidents and cases of work-related ill health must be recorded in the accident book. The accident book BI 510 / accident records are kept with Keith Carter.

The first-aider at work (FAW) / emergency first aider at work (EFAW) for these workplace premises are:

- Keith Carter (EFAW – certificate to 17.5.2018)
- Tony Finegan (FAW – certificate to 08.06.2019)

Reporting Procedures: Notification

From 12 September 2011, statutory reporting to the Health and Safety Executive (HSE) of work-related injuries and incidents under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR), transferred to a predominantly online system. Revised online forms are now available for reporting purposes. Employers no longer report incidents by email, post or by fax.

However, 'major injuries' and fatal events can still be reported to HSE by telephone. The HSE recognise that major or fatal incidents are traumatic and have retained a telephone service for those persons having to make these reports (but see also below).

3.2.1 Incident Reporting

The HSE Incident Contact Centre (ICC - see also below) will take reports of fatal and major incidents by telephone, but persons reporting all other incidents must now submit an online form, available on the HSE's website.

3.2.2 Online Forms

The online forms are:

- F2508 Report of an Injury
- F2508 Report of a Dangerous Occurrence
- F2508A Report of a Case of Disease
- OIR9B Report of an Injury Offshore
- OIR9B Report of as Dangerous Occurrence Offshore
- F2508G1 Report of a Flammable Gas Incident
- F2508G2 Report of a Dangerous Gas Fitting

The '*Responsible Person*' (under 'RIDDOR'), for reporting 'major injury' accidents, cases of incapacity, near miss events, occupationally based diseases, and specific 'dangerous occurrences' is Peter Phillips, MD and in his absence Kay Phillips, Company Secretary.

The previous 'over 3 day' incident has from the 6th of April 2012 been extended to 'over 7 days'. The reporting cycle for these events has also been extended from 10 to 15 days.

3.2.3 The HSE Incident Contact Centre (ICC)

The telephone number of the above establishment is:

0845 300 9923

The '*Responsible Person*' (under 'RIDDOR'), for reporting 'major injury' accidents, cases of incapacity, near miss events, occupationally based diseases, and specific 'dangerous occurrences' is Peter Phillips, MD and in his absence Kay Phillips, Company Secretary.

Contacts with External Services

- Local Fire Brigade: Berkhamsted Fire Service, 30 Castle Street, Berkhamsted.HP4 2DW
Tel: 01442 867107 District office
- Local Police Division: Berkhamsted Police Station, 161 High Street. HP4 3HB Tel: 01707 354000
- Accident & Emergency Department: Stoke Mandeville Hospital. Tel: 01296 315000
- First-Aid Training Provider: British Red Cross. Tel: 0845 287 5186

Health Surveillance

As an employer, employees will be provided with such health surveillance, if this is assessed as being appropriate, to safeguard their health and safety whilst at work.

Arrangements

Health surveillance will be arranged by Peter Phillips, Managing Director where appropriate.

Asbestos-Containing Materials / Contact with Asbestos

The risks to health from exposure to asbestos are well documented. Asbestos is the largest single cause of work-related fatal disease and ill health in Great Britain.

As an employer, we have a clear duty to prevent the exposure of our employees to asbestos, or if this is not possible to reduce it to the lowest possible level.

There is a new duty of which we are aware, i.e. the duty to manage asbestos in the workplace.

Employees Who Might Come Into Contact With ACMs

Our employees are not involved with the controlled removal of ACMs. However, it is possible that asbestos, or suspected asbestos might pose a threat to some employees in their work activities.

Note. Employees potentially at risk have been instructed that if asbestos is seen or suspected then they must not proceed any further with the job task. Employees are required to immediately report the situation to their immediate supervisor or manager.

Consultation with Employees

Phillips Direct Ltd is aware of the requirements of the Health and Safety (Consultation with Employees) Regulations 1996. The Company shall implement all of the requirements in the most effective, sensible and practical manner, in relation to all employees and their places of work.

The Duty Of An Employer To Consult

In accordance with the demands of this legislation, employees who are not represented by safety representatives shall be consulted in good time on matters relating to their health and safety at work. Such matters shall cover:

- the introduction of measures which may substantially affect the health and safety of employees;
- arrangements for nominating / appointing competent persons;
- health and safety information to be provided;
- the planning and organisation of any health and safety training required to be provided, and
- the health and safety consequences concerning the introduction of new technologies into the workplace.

Persons To Be Consulted

This Company shall consult with its employees by direct means.

It is, however, for the Company to determine the most effective and appropriate manner of consulting employees on health, safety and welfare matters.

The Provision Of Information

The Company is aware of its obligations to provide sufficient information to those employees who are consulted by direct means.

Health And Safety Concerns

Any employee can raise matters of concern with regard to health and safety at work. In the first instance they should liaise with any member of management.

Contractors and Visitors

Use of Contractors

When appointing contractors Phillips Direct Ltd will identify aspects of the work that the Company wants the contractor to do and consider all health and safety implications of the job they want done. This will involve:

- Assessing the risks
- Deciding what information, instruction and training is required
- How co-operation and co-ordination will be achieved
- How all parties will be consulted
- The level of supervision and monitoring required.

Selection of contractors is fundamental and the Company will ensure that all contractors appointed will be competent to do the job safely and without risks to health and safety. The following factors will be included within the Company's selection policy:

- What experience they have
- Evidence of health and safety policies and procedures
- Information about their health and safety performance
- The qualifications and skills that they have
- Evidence of their safety method statement
- What health and safety training they provide
- Their arrangements for consulting
- Any membership of relevant trade or professional body
- Evidence of any references.

Co-operation and co-ordination

Phillips Direct Ltd will make arrangements to ensure co-operation and co-ordination between all parties to ensure the health and safety of all the workplace and anyone else likely to be affected. This may take the form of regular meetings / briefings or a liaison person may be appointed by the Company.

House Rules

The Company shall attempt to ensure that visitors and contractors abide by any internal rules and any other safety procedures in force. In this respect, the Company will inform such persons of the rules for visitors upon their arrival and alert visiting contractors about the nature of hazards associated with their work tasks. The Company will make suitable arrangements for the effective management and monitoring of contractors depending on the scope of the work to be undertaken.

Rules for Visitors

- All visitors have to approach the main entrance to the premises upon their arrival, and press the doorbell.
- After gaining entry all visitors must sign the Visitors' Record Book on display.
- Visitors are expected to comply with the Company's Health and Safety Policy, and with good safety practices at all appropriate times.
- Therefore, there is controlled entry, and all visitors are met and escorted.

Control of Substances Hazardous to Health ('COSHH')

The Health and Safety at Work Act 1974 (HASWA) states that every employer shall make:

'... arrangements for ensuring, so far as is reasonably practicable, safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances ...'.

The Control of Substances Hazardous to Health Regulations 2002 {'COSHH'} (as amended in 2004), amplify and extend this general duty to all substances hazardous to health, except in few special cases such as lead and asbestos.

Both the COSHH Regulations and the Management of Health and Safety at Work Regulations 1999 set out principles of control which demand a hierarchical approach, as follows:

- eliminate the hazard
- use physical or engineering controls which reduce the risk at the source and provide protection generally rather than individually
- control the person by job design, management or (as a 'last resort'), personal protective equipment.

Adequate control of exposure to a substance hazardous to health means:

- applying the eight principles of good practice set out in within the schedule to the Regulations;
- not exceeding the workplace exposure limit (WEL) for the substances (if there is one); and
- reducing exposure for substances that can cause cancer, heritable genetic damage, or asthma, to as low as is reasonably practicable.

The eight principles of good practice, which apply to a substance regardless if it has been assigned a Workplace Exposure Limit, are:

- design and operating processes and activities to minimize emissions, release and spread of substances hazardous to health;
- take into account all relevant routes of exposure – inhalation, skin absorption and ingestion – when developing control measures;
- control exposure by measures that are proportionate to the health risk;
- choose the most effective and reliable control options which minimise the escape and spread of substances hazardous to health;
- where adequate control of exposure cannot be achieved by other means, provide, in combination with other control measures, suitable personnel protective equipment;
- check and review regularly all elements of control measures for their continuing effectiveness;
- inform and train all employees on the hazards and risks from the substances with which they work and the use of control measures developed to minimize the risks;
- ensure that the introduction of control measures does not increase the overall risk to health and safety.

No hazardous substances being used on the premises of Phillips Direct Ltd, Unicorn House, Berkhamsted at this time.

Dangerous Substances and Explosive Atmospheres ('DSEAR')

DSEAR came into force on 09 December 2002. These Regulations apply to any substance or preparation (mixtures) with the potential to create a risk to persons from energetic (energy-releasing) events such as fires, explosions, thermal runaway from exothermic reactions etc. Such substances are known in DSEAR as 'dangerous substances' and include: petrol, LPG, paints, varnishes and certain types of combustible and explosive dusts produced in (for example) machining and sanding operations.

Note. DSEAR does not address health risks: these are dealt with by the Control of Substances Hazardous to Health Regulations ('COSHH'), see previous pages.

The main requirements of DSEAR are as follows

Employers and the self-employed must:

- carry out a risk assessment of any work activities involving dangerous substances;
- provide technical and organisational measures to eliminate or reduce, to as far as is reasonably practicable the identified risks;
- provide equipment and procedures to deal with accidents and emergencies;
- provide information and training to employees.

The scope of DSEAR

Other than for certain maritime activities, DSEAR applies whenever the following conditions have been satisfied:

- there is work being carried out by an employer or self-employed person;
- a dangerous substance is present or is liable to be present at the workplace;
- the dangerous substance presents a risk to the safety of employees who may be affected by the work carried out.

Certain parts of DSEAR relating to zoning and shared workplaces have a narrower scope as defined in regulation 3 and do not, for example, apply to the offshore sector.

Overall, DSEAR can be seen to be an expansion of the general duty to manage risks under the Management of Health and Safety at Work Regulations 1999; making explicit good practices for reducing the risks to persons from fires, explosions and similar energetic events.

The person holding immediate responsibility within the Company for the identification, assessment and appropriate control measures relating to DSEAR substances is Keith Carter, Production Manager.

Display Screen Equipment (DSE) Workstations

Phillips Direct Ltd does have 'users' of Display Screen Equipment (DSE) workstations (12 in number at the time of preparing this Policy document.)

Arrangements are in place for workers to have breaks / changes of activity and for eye tests / the provision of special spectacles.

Arrangements are also in hand for suitable and sufficient DSE risk assessments to be conducted and reviewed accordingly.

DSE: Review Of Assessment

The DSE assessment or relevant parts of it should be reviewed in the light of changes to the display screen worker population, or changes in individual capability and where there has been some significant change to the workstation, such as:

- a major change to the software used
- a major change to the hardware (screen, keyboard, input devices etc.)
- a major change in workstation furniture
- a substantial increase in the amount of time required to be spent using DSE
- a substantial change in other task requirements (e.g. more speed or accuracy)
- the workstation is relocated
- the lighting is significantly modified.

Assessments would also need to be reviewed if research findings indicated a significant new risk, or showed that a recognised hazard should be re-evaluated.

Additionally, arrangements are in place for DSE 'users' to be provided with eye and eyesight tests (upon their request), and examinations, and the provision of special spectacles if required.

Electrical Equipment / Systems: Inspections, Maintenance & Testing

Arrangements are in place for the on-going visual inspections of electrical equipment and electrical testing by Harwood Electrical, Walters Ash, Bucks. Portable appliance testing (PAT) was carried out on 9th December 2014 and is about to be done again.

A Full Periodic Inspection has been carried out () and an Electrical Installation Certificate duly issued. The competent contractor attending to this work was:

DBC Contracting Limited
Unit 85
Watford Business Park
Park House
15-19 Greenhill Crescent
Watford
WD18 8PH

IQUDA of Hemel Hempstead provide IT support for the computer workstations.

In this way, the Company believes it will be fulfilling its legal obligation to 'maintain' electrical equipment / systems as required by law.

Routine Inspections of Plugs, Cables, Leads and Portable Electrical Equipment

This is a defined responsibility of all employees.

Employees are required to be vigilant with regard to portable electrical equipment and report any defects observed. The objective of this exercise is to look for any loose connections and related faults.

Note. Any defects / faults or electrical uncertainties, must be brought to the immediate attention of: Keith Carter, Production Manager, without delay. All repairs shall be attended to by a competent person. Any electrical defects detected, shall lead to the item of equipment being immediately withdrawn from work activities, until it has been examined and verified as being safe to use by a competent person.

Fire Policy and Workplace Safety

Phillips Direct Ltd will strive to achieve a fire safe working environment for the protection of employees, visitors, and any other persons who may be affected, through the implementation of the relevant fire Regulations, i.e. the **Regulatory Reform (Fire Safety) Order 2006**, which came into force on 01 October 2006.

Phillips Direct Ltd shall aim to:

- identify through proper assessment the risk to persons from fire and also dangerous substances;
- evaluate the level of risk to persons on the premises and then to reduce the risk to as low a level as is reasonably practicable;
- record any significant findings and inform employees and all other relevant persons of any risks identified;
- strive to ensure a safe place of work with effective and maintained means of escape in the event of a fire;
- inform, instruct and train relevant people as to the actions they must take in the event of a fire occurring.

Periodically, the risk from fire will be re-assessed to ensure that the findings are still effective and appropriate in the prevailing circumstances.

Employees

Employees are required under Article 23 of the Order to take reasonable care of their own, and the safety of other persons, who may be affected by their actions. Employees are required to co-operate with their employer, or other manager appointed, in order for the Company to fulfil its legal duties under this legislation.

Phillips Direct Ltd believes in the achievement of a fire safe workplace through the co-operations of the management and employees, and encourages the active involvement of its workforce to achieve a safe workplace.

Senior management have the ultimate responsibilities for fire safety planning / risk assessments, and for fire precautions in the event of a fire emergency.

Responsibilities

Peter Phillips, Managing Director, has overall responsibility for fire safety standards and safe arrangements.

The fire assembly point has been established as being the car parking area, or as designated on site. Last fire drill held on the 13th June 2017 – evacuation time 1 minute 35 seconds.

Working areas must be kept tidy and all escape routes / fire exits un-obstructed.

This above matter will be the responsibility of all employees.

A competent person examines fire-fighting equipment on an annual basis.

The Company attending to this matter is Hazlemere Fire Protection Services Limited (July).

The fire alarm system is tested every week, with records, by Keith Carter, Tony Finegan and Kay Phillips.

An initial Fire Risk Assessment was carried out in 2006. This document has been subsequently reviewed annually by Kay Phillips and Keith Carter (Production Manager) and the previous time being 15 December 2016.

The Fire Risk Assessment is subjected to annual management reviews.

All fire related documentation is kept with Kay Phillips.

Note. Fire hazards must be reported without any delay. In the first instance, an employee should report to a member of Company management.

'Health and Safety Law: What Employees Should Know'

This part of the Health & Safety Policy is a brief guide to health and safety law. It does not describe the law in detail, but it does list the key points.

Law protects health, safety and welfare at work. As an employer, this Company has a duty to protect employees and to keep them informed about health and safety in the workplace/s. We have a clear duty under the law to ensure, so far as reasonably practicable, the health, safety and welfare at work of employees. We are also clear about our obligations to provide employees with all relevant information concerning these important matters.

Employees have a responsibility to look after themselves and others. If there is a problem, an employee must discuss the matter with their immediate supervisor in the first instance.

In General, These Duties Include-

- making the workplace safe and without risks to health.
- ensuring that plant / machinery are safe and those safe systems are set and followed.
- ensuring that articles and substances are moved, stored and used safely.
- providing adequate welfare facilities.
- providing sufficient information, instruction, training and supervision necessary for health and safety.

In Particular, As an Employer, the Company Must Also-

- assess the risks to their employees health and safety;
- make arrangements for implementing the health and safety measures identified as being necessary by the assessment;
- if there are 5 or more employees, record the significant findings of the risk assessment and also the arrangements for health and safety measures;
- if there are 5 or more employees, draw up a health & safety policy statement, including the health and safety organisation and arrangements in force, and bring it to the attention of all employees;
- appoint someone competent to assist with health and safety responsibilities, and consult employees, or their safety representative about this appointment;
- co-operate on health and safety with other employers sharing the same workplace;
- set up emergency procedures;
- provide adequate first- aid facilities;
- make sure that the workplace satisfies health, safety and welfare requirements, e.g. for ventilation, temperature, lighting, sanitary, washing and rest facilities;
- make sure that work equipment is suitable for its intended use, so far as health and safety is concerned, and that it is properly maintained and used;
- prevent or adequately control exposure to substance hazardous to health;
- take precautions against danger from flammable or explosive hazards, electrical equipment, noise and radiation;
- avoid hazardous manual handling operations, and where they cannot be avoided, reduce the risk of injury;
- provide health surveillance as appropriate;

- provide free protective clothing / equipment, where risks are not controlled by other means;
- ensure that the appropriate safety signs are provided and maintained;
- report certain injuries, diseases and dangerous occurrences to the appropriate health and safety enforcing authority (see box in column 3 of the 'Health and Safety Law' poster).
- consult employees about matters affecting their health and safety.

As An Employer The Company Has Duties To-

- take precautions against fire.
- provide adequate means of escape and
- suitable means for fighting fire.

All Employees Have Legal Duties. These Include-

taking reasonable care for their own health and safety and that of others who may be affected by what they do or do not do;

- co-operating with their employer on health and safety;
- correctly using work items provided by their employer, including personal protective equipment, in accordance with training or instructions; and
- not interfering with or misusing anything provided for their health, safety or welfare.

If an employee thinks there is a health and safety problem in their workplace, they should first discuss it with a member of management.

If a problem appears to persist and there is a risk of injury and an employee still has doubts or questions about health, safety and welfare matters, then they should not hesitate to contact the Managing Director without delay.

The 'Health and Safety Law What You Should Know' poster is displayed in the Factory.

Health and safety advice is available from:

- Managing Director / Chairman
- H M Inspector of Factories (HSE)
- the local authority Environmental Health Officer
- Advisors from the Employment Medical Advisory Service
- the local Fire Officer
- the Employers' Liability Insurance Engineer Surveyor; and
- BPIF – British Printing Industries Federation

The effective training and supervision of young workers / school children / trainees will be arranged, undertaken and monitored by: Keith Carter and Peter Phillips.

Health & Safety: Professional Services

Why Health And Safety At Work Is Important To Phillips Direct Ltd.

No one wants to suffer injury or ill health, or be responsible for causing it. As an employer and controller of workplace premises, the Company has to comply with the law and there are sound reasons for paying thorough attention to workplace health / safety, and for making sure that there is the appropriate expertise.

Workplace injury and ill-health are expensive, for these reasons:

- employees - a most valuable resource - are incapacitated or work below par;
- accidents can cause damage and disrupt plant and equipment;
- management time is used unproductively in investigation and remedy;
- work schedules are disrupted and valuable time is lost;
- conviction for a criminal offence results in fines and bad publicity;
- civil liabilities can be substantial and the trend is towards larger settlements - even if awards are covered by insurance, premiums go up and up.

Health & Safety: Professional Services

Good consultants can be effective in helping to achieve compliance with health and safety legislation. In this respect, Phillips Direct Ltd, as Platinum members of the BPIF have access to a Health & Safety Adviser and to Health & Safety pages on the BPIF website www.britishprint.com in accordance with regulation 7 of the Management of Health and safety at Work Regulations 1999, to ensure access to competent help in applying the provisions of health and safety laws.

Health And Safety Risks Arising From Work Activities

Risk Assessments

The Company is aware that risk assessments are required by the Management of Health and Safety at Work Regulations 1999 and that there must be a record of the significant findings of those assessments. The significant findings following workplaces inspections / assessments will be recorded. The information based on those findings will be made available to employees. Assessments will be reviewed over time as appropriate.

We accept, therefore, that some of our operations may, unless properly controlled, create risks to members of staff and others, thus we will take all reasonably practicable measures to eliminate or reduce such risks to an acceptable level.

Any employee, who discovers a hazardous / defective condition relating to their workplace / a work activity, should report to a member of management, so that the appropriate action can be taken.

Information And Training

Where necessary, employees at any level will be provided with:

- specific and / or general health and safety training
- training in the risk assessment procedure; and
- training in any new work activity controls.

Inspections of Workplaces, the Identification of Hazards and The Control of Workplace Risks

The objectives of our workplace inspections are to identify hazardous conditions and start the corrective process and thus to make improvements and reduce risks.

Risk assessments will be undertaken by Company management (see the management structure on page 4.)

The findings of the risk assessments will be reported to the Managing Director / Chairman.

Action required to remove / control risks will be approved by the Directors.

The persons responsible for ensuring that the required action is implemented will be the Directors and the Production Manager.

The persons responsible for checking that the implemented actions have removed / reduced the risks will be Directors and the Production Manager.

Assessments will be reviewed each year, or when the work activity changes in a significant manner, whichever is the soonest.

Note. Risk Assessments. The risk assessments referred to above detail the workplace precautions / control measures that are required to reduce the level of risk. However, it is imperative that these control measures are implemented and maintained at all times. Therefore, all employees must ensure that the required control measures are in place and that safe systems of work are followed at all times.

Workplace Risks: The General Principles

Phillips Direct Ltd is mindful of the principles of risk assessment, namely:

Principles Of Prevention To Be Applied

A) *Avoiding Risks:*

- if possible avoid a risk altogether, e.g. does the work in a different way, taking care not to introduce new hazards.

B) *Evaluating The Risks Which Cannot Be Avoided:*

- by carrying out a suitable and sufficient risk assessment.

C) *Combating The Risk At Source:*

- rather than taking palliative measures. e.g. the steps are slippery - treat or replace - rather than displaying a warning sign.

D) *Adapting The Work To The Individual:*

- Adapt work to the requirements of the individual, (i.e. when designing workplaces; selecting work and personal protective equipment; when drawing up working and safety procedures and methods of production).
- Aim to alleviate monotonous work and paced working at a predetermined rate, and increase the controls individuals have over the work they are responsible for.

E) *Adapting To Technical Progress:*

- take advantage of technological and technical progress, which often offers opportunities for improving working methods and making them safer.

F) *Replacing The Dangerous By The Non - Dangerous, Or The Less Dangerous.*

G) *Develop A Coherent Overall Prevention Policy:*

- implement risk prevention measures to form part of a coherent policy and approach. This will progressively reduce those risks that cannot be prevented or avoided altogether, and will take account of the:
 - way work is organised
 - working conditions
 - environment
 - and any relevant social factors.

H) Giving Collective Protective Measures Priority Over Individual Protective Measures:
➤ give priority to those measures that protect the whole workplace and everyone who works there, and so give the greatest benefit.

I) Giving Appropriate Instructions To Employees:
➤ ensure that workers, whether employees or self - employed, understand what they must do.

The Approach & Attitude Of This Organisation To All Its Activities Will Be The:

***Avoidance Of Risks
Prevention Of Risks
Reduction Of Risks At Work***

Health & Safety Training Policy

It is our policy to provide training to employees, not only to comply with statutory requirements but also to secure a safe and healthy working environment for employees and any others who may be affected by work activities. The Company will continuously assess the health and safety training needs of employees and record the training provided.

Section 2 of the Health and Safety at Work etc. Act 1974, imposes a general duty on an employer, to provide such information, instruction, training and supervision as is necessary to ensure, so far as is reasonably practicable, the health and safety at work of employees.

Induction Training

Induction training will be provided for all employees by Line Manager and Peter Phillips.

Job Specific Training

Job specific training will be provided by Line Manager and Peter Phillips.

Special Training

Specific jobs / activities that require special training are FLT, Plant Operations, Manual Handling, and Access Equipment. FLT training is carried out by CEW Forklift Training Limited.

The appointed operators for fork lift trucks are:

Keith Carter – c/balance FLT – last test date 9/11/2017	(retest due: 9/11/2020)
Dean Macknight - c/balance FLT – last test date 9/11/2017	(retest due : 9/11/2020)

Training will be identified and arranged by Kay Phillips, Company Secretary, assisted by Keith Carter.

Manual Handling

Duties Of An Employer

Phillips Direct Ltd is aware of the duties an employer has by virtue of the Manual Handling Operations Regulations 1992.

The key duties placed upon an employer are to:

- avoid the need for hazardous manual handling, as far as reasonably practicable;
- assess the risk of injury from any hazardous manual handling that cannot be avoided; and
- reduce the risk of injury from hazardous manual handling, as far as reasonable practicable.

Duties Of Our Employees

We are aware that our employees have duties too. Essentially these are to:

- follow the appropriate systems of work laid down for their safety;
- make proper use of the equipment provided for their safety;
- co-operate with their employer on health and safety matters;
- inform their employer if they identify hazardous manual handling activities;
- take care to ensure that their activities do not put others at risk of injury.

Avoiding Manual Handling

- Checks will be made to determine if manual handling needs to be carried out at all.
- We shall also consider automation, particularly for new processes;
- think about mechanisation;
- beware of new hazards arising from automation or mechanisation.

Making The Assessment

- The assessment is the employer's responsibility.
- Selected employees can help to carry out these assessments.

Reducing The Risk Of Injury

It is our aim to reduce the risk of injury, i.e. to the lowest level 'reasonably practicable'. This means, therefore, reducing the risk until the cost of any further precautions – in time, trouble or costs – would be far too great in proportion to the benefits.

Training Requirements

We recognise the importance of training in relation to manual handling operations at work.

Training will need to cover:

- how to recognise harmful manual handling;
- appropriate systems of work;
- the use of mechanical aids;
- good handling technique (see below)

Good Handling Technique

Listed below are some important points that persons involved with manual handling should be aware of:

- to stop and think to plan the lift;
- the correct position of the feet;
- to adopt a good posture;
- getting a firm grip;
- keeping close to the load;
- to lift the load smoothly;
- moving the feet so as not to twist the trunk;
- putting down the load and then adjusting its position.

Monitoring Health and Safety

To be confident that safe working practices are being followed and to check the working conditions within the business premises, we will undertake an analysis of relevant matters listed below.

Matters For Consideration Are:

- Policy and Responsibilities
- Policy and Communications
- Monitoring Arrangements
- Insurances
- Meetings / Committees
- Specific Risk Assessments
- Safe Working Practices
- Supervision
- Safety Rules
- Welfare
- Temperature
- Lighting
- Ventilation
- Overcrowding
- Cleanliness
- Work Related Illness
- Access and Egress
- Accident Prevention and Reporting
- First Aid
- Fire
- Purchasing Policy
- Plant, Tools and General Equipment Maintenance
- Statutory Inspections
- Documentation
- Training and Competence
- Machinery Guarding

- Storage Arrangements and Housekeeping
- Controls for Hazardous / Dangerous Substances ('COSHH' / 'DSEAR')
- Personal Protective Equipment (PPE)
- Health Surveillance
- External Assistance
- Co-operation with Other Employers
- Contracts / Contractors
- Transport Safety
- Noise
- Electrical Systems / Portable Electrical Equipment
- Manual Handling Operations
- Display Screen Equipment (DSE)
- Year Plan / Priorities.

The persons responsible for carrying out health & safety monitoring are Kay Phillips, Keith Carter and BPIF

Monitoring reports will be submitted to Peter Phillips, Chairman.

Noise at Work

The Control of Noise at Work Regulations 2005 applies where noise exposure is likely to be at or above two defined 'Action Levels' and one defined 'Action Limits'. The action levels are values of 'daily personal exposure to noise', shortened to LEP_d . These depend on the noise level in the working areas and how long people spend in them during the course of the working day. The lower exposure value is a LEP_d of 80 dB (A) and the upper exposure value is a LEP_d of 85 dB (A). There are also levels of noise exposure that must not be exceeded as follows (exposure limit value) – daily or weekly exposure of 87 dB (A). These exposure limit values take into account of any reduction in exposure provided by hearing protection.

There are also a 'peak exposure levels', which depends on the maximum pressure reached by the sound wave. These values are:

- Lower Exposure Action Value – 135 dB
- Upper Exposure Action Value – 137 dB
- Exposure Limit Value – 140 dB

The Regulations place responsibilities on employers, employees and people who make and supply noisy machinery. At the workplace, primary responsibility lies with the employer. Nevertheless, both management and workers need to be involved if action is to be effective.

At these noise levels, it is imperative that ear protectors are:

- provided to all those exposed
- maintained and repaired
- always used by all those exposed.

Personal Protective Equipment ('PPE')

PPE is defined in the 1992 Regulations as:

'all equipment (including clothing affording protection against the weather) which is intended to be worn or held by a person at work and which protects him against one or more risks to his health or safety'.

Provision And Use Of PPE

The main requirement of the PPE at Work Regulations 1992 is that suitable personal protective equipment is to be supplied and used at work, wherever there are risks to health & safety that cannot be adequately controlled in other ways.

Because the effectiveness of PPE can be easily compromised, e.g. by not being worn properly, it should always be considered as the 'last resort', and used only where precautions cannot adequately reduce the risk of injury. However, where PPE is the only effective means of controlling the risks of injury, or ill health, then an employer must ensure that it is available for use at work - free of charge.

The following factors will be considered when assessing the suitability of PPE

- Is it appropriate for the risks involved and the conditions at the place where exposure to the risk may occur? For example, eye protection designed for providing protection against agricultural pesticides will not offer adequate face protection for someone using an angle grinder to cut steel or stone.
- Does it prevent or adequately control the risks involved without increasing the overall level of risk?
- Can it be adjusted to fit the wearer correctly?
- Has the state of health of employees who will be wearing it been taken into account?
- What are the needs of the job and the demands it places on the wearer? For example, the length of time the PPE needs to be worn, the physical effort required to do the job and the requirements for visibility and communication.
- If more than one item of PPE is being worn, are they compatible? For example, does the use of a particular type of respirator make it difficult to get eye protection to fit properly?

Training

We shall ensure that users of items of PPE are aware of why this is needed, when it needs to be used, repaired or replaced and its inherent limitations.

Instructions, training and supervision in its use shall be implemented.

Maintenance

Items of PPE provided to employees will be properly looked after and accommodated when not in service. PPE will be kept clean and in a state of good repair. Any trained wearer can carry out simple maintenance but a specialist will only carry out intricate repairs.

New PPE

Since 01 July 1995, new PPE needs to have been 'CE' marked. This mark signifies that the PPE satisfies certain basic safety requirements, and in most cases will have been tested and certified by an independent body.

Other Regulations

The PPE at Work Regulations 1992 do not apply where PPE is provided under six sets of existing Regulations. These are the:

- Control of Lead at Work Regulations 2002
- Ionising Radiations Regulations 1999
- Control of Asbestos Regulations 2006
- Construction (Head Protection) Regulations 1989
- Control of Noise at Work Regulations 2005.

PPE provided by Phillips Direct Ltd, include:

- High visibility jackets (for FLT drivers)
- Steel toe capped footwear
- Hearing protectors for the machines, and nuisance noise from cutting operations
- Gloves if required + plastic gloves + heat protection gloves (temp's > 350 degrees.)

The Company does not make any charges in relation to the above provision.

Key Points

A fundamental question: are there ways (other than the provision and use of PPE), that the risk can be adequately controlled, e.g. engineering controls at source?

If not we shall check that:

- suitable PPE is provided for use
- it offers adequate protection for its intended use
- those employees using it are adequately trained in its safe use
- it is properly maintained and defects are reported to management
- it is returned to its proper accommodation place after use.

Safe Plant and Work Equipment / Other Contractors

When intending to purchase new or second-hand plant and work equipment, we will ensure that it meets health and safety standards prior to buying it.

The Production Manager in conjunction with Peter Phillips, are responsible for identifying all work equipment / plant that requires maintenance.

The Production Manager in conjunction with Peter Phillips are responsible for checking that new plant and work equipment meets current health & safety standards prior to purchase.

Any problems / defects found in relation to plant and work equipment should be reported to Keith Carter, Peter and / or Kay Phillips.

External Maintenance

- Zurich > lifting equipment + 'LOLER' services of the Engineer Surveyor – expires 31/05/2016 (FLT thorough examination certificate to 23/04/2016)
- Forkway Limited > FLT (+ 'PUWER' serviced both FLT's 1.9.2015)
- Hazlemere Fire Protection Services Limited (annual service agreement, each July)
- IQUDA - - IT Support.

Vehicles Policy - Driving

- Employees must not drive any vehicle unless he / she have the relevant licence for that vehicle.
- Driving offences must be immediately reported to the Company management.
- A visual check must be made daily prior to use.
- Under no circumstances should the vehicle be left unlocked when unattended.
- Speed limitations must be adhered to.
- Due care and attention must be taken at all times to prevent damage to the vehicle, employees and the public.
- Seatbelts must be worn when the vehicle is in motion.
- Oil and water levels are to be checked regularly
- A copy of driver's licenses is kept on personnel files. It is the driver's responsibility to inform management of any changes to their license details.
- Drivers must not use their mobile phone whilst in transit unless the vehicle is equipped with hands free technology.
- When the vehicle is left unattended care must be taken to ensure no valuables are left on view.
- The Company will ensure that all vehicles have current tax and MOT certificates and are regularly serviced. Any defects must be reported immediately.

- Operators of rider operated fork lift trucks must carry out the 'Daily Pre-Use Check' sheets, and ensure that these are signed by the Supervisor.

Work At Height

The risk assessment required under these Regulations will require the Company to ensure:

- All work at height is properly planned and organised;
- Weather conditions are taken into account;
- All personnel are trained and competent;
- The place of work is safe;
- All equipment for work at height is appropriately inspected;
- The risk from fragile surfaces is controlled;
- The risk from falling objects is controlled.

Trestles, Ladders and Step Ladders

All trestles, ladders and stepladders must be checked before use to ensure their acceptable physical condition.

Wherever possible, step ladders (fully opened) should be used as opposed to freestanding ladders.

Freestanding ladders must be erected to an angle of 4: 1 (a ratio of 1 horizontal unit to 4 vertical units) and preferably be secured at /near the top. If not securely fastened, a colleague must always foot the ladder at its base to prevent it from slipping.

Some other safety measures include:

- ensuring the equipments adequate type, strength and size,
- using it only for its designed purpose,
- not overstretching /reaching from ladders,
- not standing upon the uppermost rungs,
- not carrying tools or equipment by hand when "climbing" a ladder,
- ensuring suitable handholds or physical restraint protection if working at extensive height or from an elevated platform.

Workshop Machinery

Phillips Direct Ltd is aware of the duties an employer has by virtue of the Provision and Use of Work Equipment Regulations 1998.

Significant health and safety matters include:

Machinery:

Suitability, stability, location, guarding of dangerous parts, other safety devices and measures, stop controls, markings and maintenance.

Environment:

Lighting, housekeeping, access, under-foot conditions, noise control, wood dust exposure control and formal examination etc of certain control devices.

Operatives:

Training, instruction, information, supervision, use of safety devices and adherence to safe operating procedures.

Operating Procedures:

Establishment, application, monitoring and review of appropriate safe working practices / operating procedures.

All reasonable and suitable measures will be taken by the Company to prevent, protect or otherwise control significant health and safety matters associated with the provision and use of its printing machinery and associated plant.

In accordance with coverage elsewhere within this Policy, the Company expects employees to co-operate fully with the effective application of these measures at all appropriate times.