



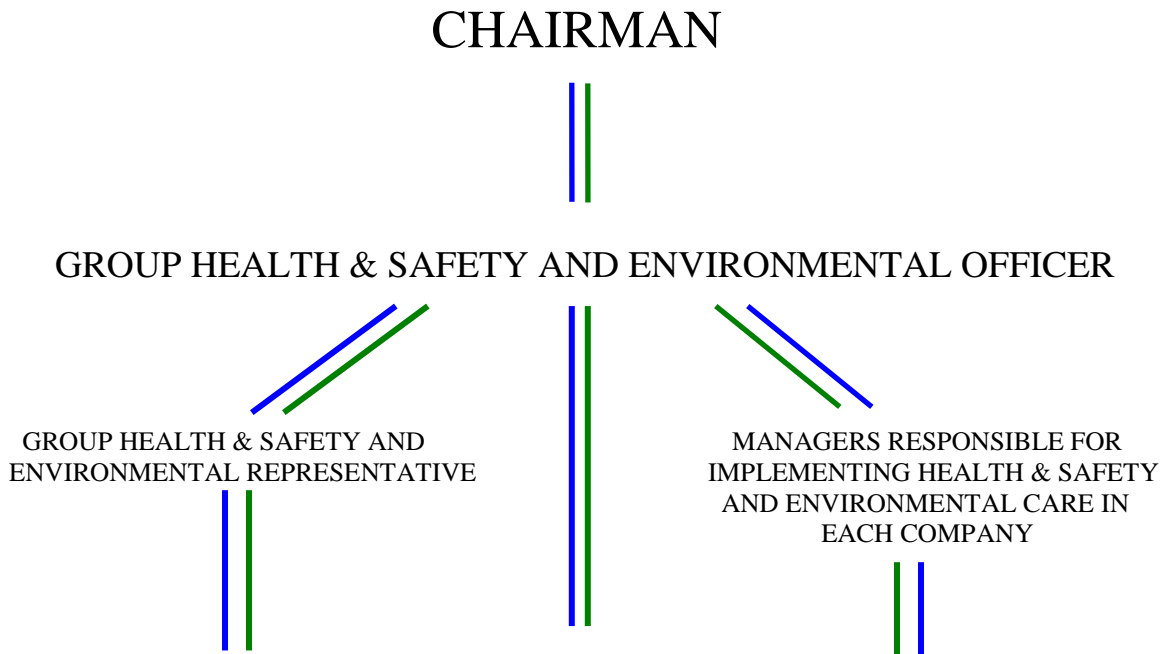
HARGREAVES HAMILTON GROUP
HEALTH & SAFETY
AND ENVIRONMENTAL POLICY

Health & Safety and Environmental Policy

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1 ORGANISATION HIERARCHY



All employees at the 7 named companies:

- Hargreaves Hamilton & Co. Ltd.*
- J & D Andre Ltd.*
- Hargreaves Hamilton Engineers Ltd.*
- Hargreaves Hamilton Gears Ltd.*
- Lancashire Transmissions & Conveyor Engineers Ltd.*
- J. Doyle Ltd.*
- Barton Lake Ltd.*

KEY

-  Health and Safety Organisation Hierarchy
-  Environmental Organisation Hierarchy

2 RESPONSIBILITIES

2.1 The Chairman

- to have overall responsibility for the Group's Health & Safety and Environmental Policy (*Document 1*)
- to ensure that there are sufficient financial and physical resources available to each company for it to fulfil the Health & Safety and Environmental Policy

2.2 Group Health & Safety and Environmental Officer

- to devise and implement appropriate arrangements for Health & Safety and Environmental care throughout Hargreaves Hamilton Group
- to ensure that all Company Managers understand the implications of the Health & Safety and Environmental Policy with regards to their personal responsibilities.
- to advise upon, conduct, provide and enforce training relative to each individual's needs
- to monitor the performance of each company through training reviews and ongoing inspections/assessments, delegating responsibilities when necessary to ensure corrective measures are taken
- To undertake a Health & Safety and Environmental Audit every 12 months with the Group Health & Safety and Environmental Representative. The Audit is to be quantitative as well as qualitative to facilitate a benchmarking system (*H.S.E.F. 51*) The H & S and E Officer must also diary all 'close out clauses' in the Health & Safety and Environmental Diary to ensure all actions are completed

in the given time scale

- To set targets following the H & S and E Audit, covering all parts of the document, ensuring high safety standards are maintained. The benchmarking process, near miss data trends and other information gathered should all be used to facilitate the setting of targets
- to acknowledge and adhere to all changes in legislation through producing regular revised editions of the H & S and E Policy
- to ensure communication lines remain open throughout the workforce
- To document all Incidents, Accidents and Near Misses relating to both Health & Safety *and* the Environment to ensure corrective measures are taken immediately and to also allow recurring trends to be highlighted and subsequently addressed. Targets should also be set from this information gathered. Full investigations are to be carried out for each event and reports produced to ensure all necessary corrective measures are highlighted and also detailed records can be gathered over time
- to ensure a full Business Risk Assessment (*RA/Business Risk Assessment*) is carried out every 12 months and to have emergency plans in place for as many potential events as could happen
- to monitor and maintain the 'health' of all employees
- to conduct a Health & Safety and Environmental Tour with all Senior Managers on a quarterly basis (*H.S.E.F. 47*)
- to ensure that **all** visitors to the HH Group sign into the Visitors book (*Document 35*) at the Main Reception on arrival and also sign out on departure. Visitors

may include sub contractors, contractors, suppliers, customers, consultants, family etc. Please note that the **general public** who enter the Workwear Shop, LTCE Trade Counter, J. Doyle Trade Counters and also Barton Lake Showroom are excused from the necessity to sign in.

- to ensure that all tenants in Nelson Mill run their own Visitors book
- to ensure that all sub contractors working anywhere in Nelson Mill, whether this be for the HH Group or for one of the tenants, are logged in the Visitors Book

2.3 Group Health & Safety and Environmental Representative

- to co-operate fully with the Group's Health & Safety and Environmental Officer to enable the successful implementation of the H & S and E Policy into each company
- To fulfil his duties as the Group Health & Safety and Environmental Representative. These duties are stated showing frequencies and relevant paperwork needed and must be understood and acknowledged (*H.S.E.F. 1*)
- To conduct both Health & Safety and Environmental Risk Assessments on and off site following instructions from the H & S and E Officer. These assessments must be sufficiently detailed to highlight all possible risks and those individuals/groups affected
- to ensure that **all** visitors to Nelson Mill sign into the Visitors book at the Main Reception on arrival and also sign out on departure. Visitors may include sub contractors, contractors, suppliers, customers, consultants, family etc. Please note that the **general public** who enter the Workwear Shop, LTCE Trade Counter, J. Doyle Trade Counters and also Barton Lake Showroom are excused

from the necessity to sign in.

- to communicate any complaints received from employees/sub contractors with the Health & Safety and Environmental Officer

2.4 Company Managers

- to insure that the Health & Safety and Environmental Policy is brought to the attention of all their staff and any sub-contractors used and that it is understood and implemented by all concerned
- to be responsible for taking disciplinary action with regard to an individual's failure to comply with the H & S and E Policy or any statutory duty imposed. Verbal instructions should be issued and documented *(H.S.E.F. 58)*
- to read each revised edition of the Health & Safety and Environmental Policy, signing to show that it has been read and understood in terms of what their duties are as a Company Manager *(H.S.E.F. 2)*
- to conduct a Health & Safety and Environmental Tour of their department with the H & S and E Officer on a quarterly basis *(H.S.E.F. 47)*
- to ensure that **all** visitors to Nelson Mill sign into the Visitors book at the Main Reception on arrival and also sign out on departure. Visitors may include sub contractors, contractors, suppliers, customers, consultants, family etc. Please note that the **general public** who enter the Workwear Shop, LTCE Trade Counter, J. Doyle Trade Counters and also Barton Lake Showroom are excused from the necessity to sign in.

2.5 Company Employees

- to read, understand and implement where applicable the Health & Safety and Environmental Policy and any subsequent revisions thereafter (*H.S.E.F. 3*)
- all employees of HH & Co Ltd who will be classed as a Lone Worker i.e. Drivers etc, are to abide by the Lone Workers policy which can be found in the Hargreaves Hamilton Group Policies & Procedures Manual
- to understand that it is an offence leading to disciplinary action not to comply fully with the H & S and E Policy
- to take reasonable care of their own health and safety and that of others who may be affected by their acts or omissions; e.g., do not obstruct a fire exit, always drive carefully and always use guards provided on machines
- to fully co-operate with the employer, Hargreaves Hamilton Group, so far as is necessary, so as to ensure that the employer can comply with his statutory obligations; e.g. report hazards or defects in control measures, attend training etc.
- to wear any necessary personal protective equipment issued, material or substance provided to him/her in accordance with any training and instruction
- to keep their workplace tidy and free from hazards
- to never interfere with provisions made for Health & Safety and Environmental care
- to wash hands after work before commencing a break or leaving work
- to ensure that **all** visitors to Nelson Mill, who you may personally deal with for whatever reason, sign into the Visitors book at the Main Reception on arrival and

also sign out on departure. Visitors may include sub contractors, contractors, suppliers, customers, consultants, family etc. Please note that the **general public** who enter the Workwear Shop, LTCE Trade Counter, J. Doyle Trade Counters and also Barton Lake Showroom are excused from the necessity to sign in.

3 HEALTH & SAFETY AND ENVIRONMENTAL ARRANGEMENTS

3.1 Risk Assessments

Where a particular hazard exists, with regards to any of the arrangements outlined below, a Risk Assessment will be carried out by either the Group Health & Safety and Environmental Officer *or* the Group H & S and E Representative to assess the likelihood of the hazard being a danger to a person's Health & Safety *or/and* to the Environment. The assessments will put forward recommendations for the *reduction* of the risk and will be part of the continuing monitoring process. Records of these Risk Assessments are to be kept *(H.S.E.F. 4)*

3.2 Safe Systems of Work

Safe Systems of Work may be needed when a particular activity involves a high degree of risk to a person/group of people *or/and* the environment. Whether or not a Safe System of Work is needed will be decided by a Risk Assessment of the particular activity. These Risk Assessments will be cross referenced when applicable with the relative Safe System of Work. If a SSOW states that PPE is to be worn, a list of the required equipment together with the industry safety standard code will be stated at the end of the SSOW. The Safe Systems of Work will be

shown on the relevant company's Health & Safety and Environmental board with a copy kept by the Group H & S and E Officer. *(H.S.E.F. 5)* Personnel involved in the type of work detailed in the SSOW will be asked to acknowledge their understanding of the safe procedures documented *(H.S.E.F. 6)*

3.3 Record Keeping

All records to be kept in an organised manner by the Group H & S and E Officer. It is intended that the Group H & S and E Representative keep a 'Safety Diary' detailing any safety work undertaken (e.g. put up a notice, issued protective equipment) showing the time and date of the work *(Document 2)*

3.4 Access and Egress

Objective: To keep the workplace, including staircases, floors, ways *in & out*, washrooms etc., in a safe and clean condition, free from articles likely to cause slips, trips and falls. Also to make sure all furniture and fittings are kept sufficiently clean and in working order

Action:

- a) cleaning staff to clean inside the building, including all furniture, floors and stairs on a daily basis
- b) cleaning staff to remove rubbish from all litter bins on a daily basis
- c) it is the responsibility of the H & S and E Representative to ensure that the cleaning staff are keeping to the specific cleaning remits drawn up for the different areas in Nelson Mill *(Document 3)*
- d) the Group H & S and E Representative to ensure tidiness around the outside of

the building on a weekly basis

- e) the Group H & S and E Representative to take rubbish to the external rubbish skip collected by cleaners the night before on a daily basis

3.5 **Fire**

Objective: To achieve a concise fire precautions procedure

Action:

- a) it is the responsibility of the H & S and E Officer to ensure an up-to-date Fire Risk Assessment is on file at all times for all areas that have different work activities **(RA/Fire x 8 + all tenants)** using NEBOSH produced guidance *(Document 5)*
- b) all fire exits to be marked, unlocked and free from obstruction
- c) all exits and fire escapes to be checked weekly by Group Health & Safety and Environmental Representative *(H.S.E.F. 7)*
- d) good housekeeping measures in operation throughout the Mill. Non office areas; i.e., workshop and garage/scrap yards to have documented daily routines to adhere to *(Document 33. Gears/LTCE, 33.Doyles etc.)*
- e) machinery maintenance daily checks in place on all machines as per PUWER regs *(H.S.E.F. 34/35/36)*
- f) emergency lighting to be in place at major exits
- g) the cigarette box at the entrance to the building to be emptied weekly
- h) the Group H & S and E Representative to ensure that refuse is removed from all areas on a daily basis

- i) all fire extinguishers to be checked by certified inspectors on a set service schedule in June of each year (*Document 49*)
- j) all fire extinguishers and hose reels to be checked monthly for leaks, use and any damage by the Group H & S and E Representative (*H.S.E.F. 8, 8/W, 8/L*)
- k) all fire alarm systems, emergency lighting and smoke detectors to be tested every 6 months by a contracted company (*Document 50*) and evidence received of most recent work and issue of new equipment from professional companies (*Documents 54*)
- l) all fire alarm call points to be tested on a rotor system of one call point per week by the Group H & S and E Representative (*H.S.E.F. 9*) and (*Document 4*). Instructions for the weekly test procedure are provided (*Document 36 and 48 and 52*).
- m) A six monthly fire practice to take place to test the system and evacuation procedure. Practice Evacuation Incident Controllers Instructions (*Document 37, 37.L, 37.W*) are issued to the Controllers at all three sites. A fire drill log is to be kept by the Group H & S and E Representative detailing fire alarm drills every 6 months (*H.S.E.F. 11*)
- n) all staff are to be made aware of fire procedures during their Induction Training (*Document 38, 38.L, 38.W*) and also through a laminated sheet of brief instructions on their departmental Health & Safety and Environmental Notice Board (*H.S.E.F. 12, 12.L, 12.W*) Acknowledgement of this training is required (*H.S.E.F. 50*)
- o) A list of Fire Marshals and their designated sweeper areas and Assembly

Points ([Document 39](#)) is posted on all H & S and E Notice Boards throughout the Mill and at the other 2 sites owned by HH Group together with being issued to the tenants for their reference.

- p)** A red Fire Folder for each site ([Item 3, 3.L, 3.W](#)) is kept up to date with all necessary fire information which would be needed in the case of an emergency. It has 'Incident Control Kit' on the front. For the largest site, Nelson Mill, an exact replica ([Item 3.Backup](#)) of this item is also kept at the furthest point away from the first in J. Doyle Office to ensure at least one copy dependant on the location of the fire, would make it to the Assembly Point and be given to the Fire Rescue Team.
- q)** A list of Normal Working hours and breaks of all the companies in Nelson Mill plus the other 2 sites owned by HH Group together with staff totals ([Document 40](#)) is provided in the Fire Folder.
- r)** A list of Dangerous Substances ([Document 41, 41.L, 41.W](#)) is also available in the Fire Folder for the Incident Controller to issue to the Fire Brigade should they attend site. Documents 40 and 41 are filed under 'Important Info for the Emergency Services'.
- s)** Details of the nearest fire hydrant plus the location of the following cut off points: water, gas, oxygen tank (Westh only), mains electricity, sprinkler system (Lever Bridge only) and oil, to be kept in the Red Fire Folder for each site ([Document 47, 47.L, 47.W](#)).
- t)** A map of the Building to be placed in the Red Fire Folder ([Document 51, 51.L, 51.W](#)) together with the Zonal Plan of the Mill ([Document 53](#)).

- u)** A set of Evacuation instructions for the Incident Controller is given out to all the Incident Controllers for each of the 3 sites, specific to their site (*Document 42, 42.L, 42.W*). A checklist to use on each evacuation (practise and emergency) is also issued (*Document 43*). Equipment is also issued to the Controllers for each site to ensure they conduct the role adequately (Red Folder holding all fire information + pen and high vis). It is their responsibility to ensure all equipment provided is kept safe and in working order.
- v)** A set of Incident Control Assistant instructions is issued to the Assistants at the Nelson Mill and Westhoughton sites (*Document 44, 44.W*). There is no Assistant at the Lever Bridge Mill as the Risk Assessment did not deem it necessary due to only 2 staff. Equipment is also issued to these assistants to ensure they conduct the role adequately (torch, clipboard + pen and high vis) It is their responsibility to ensure all equipment provided is kept safe and in working order on a weekly basis; i.e., the torch) Advised to be diarised.
- w)** A set of Fire Marshal Evacuation Instructions is issued to all the Fire Marshals for each of the 3 sites, specific to their site (*Document 45, 45.L, 45.W*). Equipment is also issued to each Fire Marshal (High vis waistcoat, clip board + pen and a torch). It is their responsibility to ensure all equipment provided is kept safe and in working order on a weekly basis; i.e., the torch) Advised to be diarised.
- x)** Each Fire Marshal is to have a record with an up to date list of employee names. This is to be used at all fire alarm evacuations. It is the duty of the Fire Marshal to keep this record up to date and store it on a red clip board with

the name of your company on it *(H.S.E.F. 10 x 15 areas)*. The Incident Controller will have a Master Copy of all the areas kept in the Red Fire Folder *(H.S.E.F. 10.Master)*.

- y) All those in the 'Fire Team' (Fire Marshals *(H.S.E.F. 53)*, Incident Controllers *(H.S.E.F. 54)*, Incident Controller Assistants *(H.S.E.F. 55)* to have training.
- z) Key members of staff in all companies are to be given fire extinguisher training by a professional company *(H.S.E.F. 56)*. Following this training, these members of staff are to pass on their training to all other members of staff in their companies *(H.S.E.F. 57)* and *(Document 55)*. Also, new starters at their Induction will be given the same training.
- aa) tenants of Nelson Mill are to be made aware of fire procedures in the building and to sign to say they are aware of all details *(H.S.E.F. 13)*
- bb) All Sites will become smoking free in line with new Government Regulations on 1st July, 2007. 'No Smoking' signs will be displayed at all entrances to the property. *(Sign One)*
- cc) The Smoking Laws notice will be issued to each and every new starter and employee as part of their induction training. The employee will have to completely read and understand this notice and comply with it fully *(Document 32)*
- dd) All company vehicles will become *smoke free zones* on 1st July, 2007 in line with the above regulations and will display the relevant signage *(Sign Two)*
- ee) the H & S and E Representative to check Lion Mill and Lever Bridge Mill once a month to ensure that fire precaution measures have been kept in order and to

take action if there have been any changes *(H.S.E.F. 14)*

ff) the H & S and E Representative to check the sprinkler on a weekly basis at Lever Bridge Mill, this should include a Water Motor Alarm Test. The results of the weekly check should be documented using the sprinkler check sheet provided by the insurance company *(Document 6)* and *(Document 46)*.

gg) A Visitors Book *(Document 35)* is in place at the Main Reception of Nelson Mill to ensure that all visitors to the HH Group are logged in case of emergency. Signs are displayed at all entrances as well as the Main Reception to inform visitors to the HH Group of the necessity to sign in *(Signs 12 and 13)*. Visitors may include sub contractors, contractors, suppliers, customers, consultants, family etc. Please note that the **general public** who enter the Workwear Shop, LTCE Trade Counter, J. Doyle Trade Counters and also Barton Lake Showroom are excused from the necessity to sign in.

hh) A sign is displayed at the main reception of the Mill asking all contractors conducting work in Nelson Mill *(Sign 17)*; whether this be for the HH Group or one of the tenants, to make themselves known to the H & S and E Officer of Nelson Mill. All staff are reminded on a 6 monthly basis that they must ensure their visitors sign in and out using the Visitors Book and also that their subcontractors log their attendance with the H & S and E Officer every time they are on site.

3.6 Incidents/Accidents/Near Misses

Objective: All Incidents/Accidents/Near Misses to be noted and investigated to avoid reoccurrence

Action:

- a) If an employee or contractor/visitor is killed or suffers a major injury, the HSE must be informed without delay and within ten days a completed accident form (F2508) must be sent to the aforementioned office. F2508 forms are available from the Group H & S and E Officer
- b) if an employee or contractor/visitor suffers an injury that results in them being off work or unable to do their normal work for more than three days a completed accident form (F2508) must again be sent to the HSE
- c) if an employee or contractor/visitor suffers a reportable work-related disease a completed disease report form (F2508) must be sent to the HSE
- d) if something happens which does not result in a reportable injury, but which clearly could have done (Dangerous Occurrence) the occurrence should be reported without delay to the HSE and within ten days a completed accident form (F2508) must be sent to the aforementioned office
- e) All companies to have an Accident Record Book (Document 7) It is the duty of all the Company managers to ensure that *all* accidents are noted and signed by the person who had the accident. Also any 'dangerous occurrence' should be recorded in this book. All documentation created for insurance purposes must be filed in the Health & Safety and Environmental Cabinet in the file marked 'Accidents'. Following an incident or accident, a questionnaire must be completed to allow a full investigation (Document 8 and Document 9 consecutively)

- f) it is the responsibility of the Group H & S and E Officer to ensure that all Near Misses are reported *(H.S.E.F. 15)* All employees must be aware of what a 'Near Miss' is, the importance of logging every Near Miss and be shown *how* to log a Near Miss *(Document 10)* The H & S and E Officer must periodically highlight any trends that may be occurring between near misses of a particular nature and produce new Risk Assessments or Safe Systems of Work if necessary
- g) it is the responsibility of the Group H & S and E Representative to report at least one Hazard/Near Miss per week *(H.S.E.F. 15)*
- h) it is the responsibility of the Company Manager to report at least one Hazard/Near Miss per week *(H.S.E.F. 15)*
- i) the H & S and E Officer must also ensure that all Incidents/Accidents/Near Misses that have an additional impact on the *Environment* over the normal activities of the Group, are reported to primarily avoid reoccurrence but also to allow for trends to be highlighted and therefore changes to be made following any information gathered *(H.S.E.F. 16)*
- j) Emergency plans for Health and Safety as well as Environmental Accidents must be drawn up by the H & S and E Officer. These should be done in advance of any occurrence and are often obvious following an assessment of the premises, but they can also be formulated following a report of an Incident/Accident/Near Miss *(Documents 11 .1, .2, .3, etc...)*

3.7 **First Aid**

Objective: First aid equipment to be available at all times, the location and

names of persons responsible for first aid to be known to all employees

Action:

- a) All staff to be shown during Induction Training;
 - ✓ the location of first Aid Boxes
 - ✓ the location of the list of qualified First Aiders (*Document 12*)
 - ✓ Demonstration of what is inside the First Aid Box (*Item 2*)
 - ✓ Basic First Aid pointers (*Document ...*)
- b) all companies to have their own first aid box which is easily accessible
- c) all lone workers to have their own first aid box on their vehicle at all times
- d) first Aid boxes to be checked monthly (*H.S.E.F. 17, 17.1, 17.2*)
- e) the names of the First Aiders to be posted above every first aid box (*Document 12*)
- f) it is the responsibility of the Health & Safety and Environmental Representative to ensure this list is current every 6 months, identifying to the H & S and E Officer if any members of staff are due for renewal in the near future
- g) all eye wash stations to be checked monthly (*H.S.E.F. 18*)

3.8 Health of Employees

Objective: To ensure that the health of each individual employee is monitored and good health is maintained throughout the length of their employment at Hargreaves Hamilton

Action:

- a) as part of the interview process a medical self assessment questionnaire must

be completed by the interviewee and be to the satisfaction of the Company Manager before employment is offered (*Document 13*)

- b) If a health issue is highlighted in this initial questionnaire, then the Company Manager has the responsibility to address this issue before employment is offered. If the Company Manager decides to offer employment, then the new employee must state his health issue and its current state in **written** form so that, in the future, the Company is not held responsible for this health issue. The Company Manager must also seek a current medical report on the issue from the said individual
- c) it is the responsibility of the employee to highlight any health problems or issues he/she may have before the start of employment and also during employment at the Company (both physically and mentally)
- d) it is the responsibility of the employee to inform the Company Manager if prescribed drugs for medical reasons, which may potentially effect his work; most importantly if the employee is a machine operative and he/she is prescribed drugs that may *or do* cause drowsiness
- e) in order to monitor the health of all staff, each individual must conduct a self assessment every year (*Document 13*) It is the duty of the H & S and E Officer to investigate any deterioration in health that is apparent
- f) To issue at induction stage the HSE pocket card 'Leptospirosis' (*Document 14*) to those employees handling waste products during their daily work duties. A signature will be required to show acceptance of the card (*H.S.E.F. 19*). The cards remind employees of the health hazards they are

subject to, together with the precautions they need to take, in order to reduce the risk of infection. The cards will also allow early detection of the illness by doctors

- g)** All workers that use machines on a regular basis in HH Gears and J. Doyle are issued with a sign (*Sign 21*) on their H & S and E Notice Board advising the use of barrier cream.
- h)** the Hargreaves Hamilton Group is committed to improving the 'health' of all employees utilising its various communication channels to give advice, tips, and information to encourage good health
- i)** it is the responsibility of the Company Manager to encourage staff to report any acts of *physical* or *verbal* violence received at work which has caused stress or indeed harm

3.9 Water Hygiene

Objective: to ensure that all drinking/bathing water on site is safe and healthy

Action:

- a)** to have a nominated person in the Group to be in charge of 'legionnaires control' on site
- b)** to ensure that all water outlets are identified as either 'drinking' or 'non drinking' outlets (*Sign Three*)
- c)** to ensure that all hot taps that have a tendency to get 'very hot' are marked accordingly (*Sign Four*)
- d)** any taps that are found to drip should be attended to immediately and

signage considered if still an issue after maintenance (*Sign Five*)

- e) it is the responsibility of the H & S and E Representative to clean the machines and drip trays on all water cooler systems throughout the Group on a weekly basis (*H.S.E.F. 20*)
- f) all water coolers have a six monthly service/filter change by the appropriate water companies used
- g) To ensure that all bathing water in the hot tubs/swimming pools in Barton Lake is safe to use. It is the responsibility of the Company Manager to ensure that daily water tests are conducted on those products used by the public
- h) to ensure that all showers on site are run at least once a week to prevent legionnaires disease
- i) To ensure that the shower head is bleached and cleaned once a month. It is the responsibility of the Company Manager to ensure that the contract cleaner is doing this

3.10 **Stress**

Objective: to be aware of the triggers of stress in the workplace, to be aware of coping mechanisms and how the ability to cope differs between individuals. To where possible minimise *stress causing scenarios* and at the same time understand that employees can bring stress to work from their personal life

Action:

- a) To have a Stress Policy in place issued to all staff/new starters (*Document 15*)
- b) the employee also has a responsibility to report immediately to his Company Manager on realisation that he/she is feeling pressured/stressed
- c) it is the responsibility of the Company Managers to look for and immediately recognise stress signs amongst his/her employees and to report them to the H & S and E Officer immediately
- d) it is the responsibility of the Company Managers to understand the various triggers of stress and to ensure that pressures of work are minimised when and where possible
- e) the H & S and E Officer must actively encourage stress notification from the employees
- f) to ensure that stress complaints are treated with the utmost confidentiality

3.11 **Noise**

Objective: To comply with all Noise at Work Regulations (1989)

Action:

- a) to undertake Risk Assessments in all areas and activities where there is thought to be the risk of damage to hearing (*RA/Hearing*)
- b) to undertake Noise Level Tests once a year in areas highlighted as having potentially dangerous levels of noise (*H.S.E.F. 21*)
- c) To display the log of noise levels to generate average figures plus any trends evident in the levels. The graphs generated should also highlight additional

protection needed in problem areas *(Document 16)*

- d) to reduce the risk to hearing to the lowest level reasonably practicable
- e) where the noise is equal to or above 85dB(A) to supply hearing protection upon request
- f) where the noise level is equal to or above 90dB(A) then employees shall be provided with suitable hearing protection
- g) where the noise level is above 90dB(A) it should be marked an ear protection zone with appropriate mandatory signs
- h) where hearing protection is needed and kept in a certain place they will be checked for wear/tear monthly *(H.S.E.F. 22)*

3.12 Training

Objective: To ensure that all employees are trained to the standard required by the law

Action:

- a) It is the responsibility of the Company Manager to find out if there is a deficit in training needs within their company. Anybody who needs training for their role must be sent on the relevant course *or* given internal training
- b) It is the responsibility of the Company Manager to ensure that all new employees are given the necessary induction training to ensure the smooth running of his/her individual job. It is the responsibility of the Company Manager to ensure that this is done correctly and sufficiently until the new employee is confident in his ability to continue unaided. The Company Manager should

ensure sufficient supervision is given to new staff until deemed, by both parties, as capable of continuing without immediate supervision. The Company Manager should understand that people have differing learning curves and therefore some new staff will need more training/supervision than others.

c) It is the responsibility of the Company Manager to ensure that the new employee receives the *Health & Safety and Environmental Induction Training* in the morning of their first day at work *(H.S.E.F. 23)* this induction training will be carried out by the H & S and E Representative. It should include the following mandatory elements where applicable:

- 1 week to read the HH Group Health and Safety and Environmental Policy *(Document 1) (H.S.E.F. 1, 2 or 3 for relevant acceptance of the Policy)*
- Location of nearest binded H & S and E Policy *(Manager's office)*
- Location of Company Health & Safety and Environmental Notice Board
- Location of First Aid Boxes and relevant First Aid information *(Document 12)*
- Demonstration of what is in a First Aid Box? *(Item 2)*
- Basic First Aid pointers *(Document)*
- Location of Accident Record Book *(Document 7)*
- Location of toilets and washroom facilities
- Location of canteen
- Location of Suggestion Box
- Health & Safety and Environmental Communication Form *(H.S.E.F. 26)*

- Fire alarm exits and fire alarm procedure (H.S.E.F. 12/12.W/12.L)
 - Smoking Laws (Document 32)
 - Manual Handling Training (Document 22) and (H.S.E.F. 38)
 - Fire Extinguisher Training (Document) and (HSEF)
 - Issue and instruction of Personnel Protective Equipment (H.S.E.F. 29)
 - Near Miss logging procedure (Document 10) and (H.S.E.F. 15)
 - Leptospirosis Training (Document 14) and (H.S.E.F. 19)
 - Visual Workstation Checks (Documents 18 and 19)
 - Company Vehicle Pack (Documents 24 and 25) and (H.S.E.F. 42 or 43) and SSOW/Driving
 - Traffic Management (SSOW/Traffic Management)
 - Environmental Housekeeping Rules (Document 29) and (H.S.E.F. 48)
 - Stress Policy (Document 15)
 - Training Matrix – how it works (H.S.E.F. 24)
- d)** all employees to have in their files a training matrix (*reissued every 2 years*) detailing their training needs, whether they have been trained and when refresher courses have been taken (H.S.E.F. 24)
- e)** a Master Matrix Plan will be kept by the Health & Safety and Environmental Officer to highlight refresher training needs in advance (H.S.E.F. 25)
- f)** Any employees or new starters who do not speak English as their first language will have all training sessions and their initial induction given to them by an internal interpreter. If however there is not an internal interpreter

available, an external interpreter will be provided. Both the interpreter and trainee will sign a document to indicate they have completed and fully understood the training/induction. (H.S.E.F 59)

3.13 Communication

Objective: To ensure that the employer, all employees, sub contractors and visitors are aware of their specific health & safety and environmental requirements to their work

Action:

- a) All information relating to safety matters to be collected and processed by either the Group H & S and E Officer or Representative. They will then ensure that all relevant items are displayed on the Health & Safety and Environmental Notice Board or given directly in written *or* verbal form to employees
- b) All subcontractors and visitors to the building are to be advised of any relevant signs. This is the Company Manager's responsibility of whichever company they are working for/visiting
- c) No one is allowed to work by themselves during *or* out of working hours without means of contact or at least one person making hourly contact. This applies to all employees and contractors. It is the Company Manager's responsibility to make sure this never happens
- d) signs will be displayed indicating where the correct clothing and equipment should be worn
- e) all constructive employees comments regarding this policy are welcomed and

should be placed in the confidential Suggestion Box using the Communication Form (H.S.E.F. 26)

- f) a confidential Suggestion Box should be available at all times and emptied daily by the Health & Safety and Environmental Representative
- g) 6 monthly site surveys to be sent out to all staff requesting feedback on their workplace environment with respect to their own health, safety and welfare (H.S.E.F. 27) It is the responsibility of the H & S and E Representative to distribute and collect these every 6 months

3.14 Identification of Legislation Changes

Objective: To ensure that any changes in legislation are acknowledged and adhered to immediately by all employees and these changes are written into the Health & Safety and Environmental Policy at the nearest opportunity

Action:

- a) The Health & Safety and Environmental Officer is responsible for being aware of all legislation changes *in advance* of these changes being made mandatory by law. This is possible through the use of external communication channels such as email and the post, together with correspondence from the HSE
- b) on receipt of notification of these changes, the H & S and E Officer must firstly communicate the information to the H & S and E Representative and also all Company Managers through internal email/memos or a meeting
- c) The H & S and E Officer must secondly instruct the Company Managers to conduct mandatory tool box talks with all staff by a specific date guided by the

law enforcement date. If external or internal training is required, the H & S and E Officer must also organise this in advance of the law enforcement date

- d) The H & S and E Officer must also assess if the change in legislation requires the Induction Training to envelop the change. If so, the training must be amended and the H & S and E Representative made aware
- e) It is then the responsibility of the Company Managers to carry out tool box talks ensuring that all personnel affected by the change in legislation sign their name as acknowledgment that they have listened and understood the context of the discussion. These acknowledgments must be handed to the H & S and E Representative *(H.S.E.F. 28)*
- f) the H & S and E Officer must ensure that this change in legislation is written into the next revised edition of the H & S and E Policy

3.15 Identification of Internal Changes/Acquisitions

Objective: To ensure that any changes/acquisitions within Hargreaves Hamilton Group which would have an immediate effect on the H & S and E Policy are acknowledged and adhered to by all employees and these changes are written into the Policy at the nearest opportunity

Action:

- a) following a change within the company's activities, personnel, equipment or when better practise has been highlighted, it is the responsibility of the employee or Company Manager, who notices the apparent change, to communicate this with the H & S and E Officer, via the H & S and E

Representative if applicable

- b) The H & S and E Officer must then act upon this information received by delegating to the H & S and E Representative to conduct Risk Assessments/ Reports/Inspections/Internal Training if necessary. If external training is required, the H & S and E Officer must organise this
- c) The H & S and E Officer must also assess if the change/acquisition requires the Induction Training to envelop the change. If so, the training must be amended and the H & S and E Representative made aware
- d) once all information has been collated the H & S and E Officer must firstly communicate with the H & S and E Representative and also all Company Managers through internal emails/memos/meetings
- e) The H & S Officer must instruct all Company Managers to carry out tool box talks ensuring that all personnel affected by the change/acquisition sign their name as acknowledgment that they have listened and understood the context of the discussion. These acknowledgments must be handed to the H & S and E Representative *(H.S.E.F. 28)*
- f) the H & S and E Officer must ensure that this change/acquisition is written into the next revised edition of the H & S and E Policy

3.16 Protective Clothing & Equipment

Objective: To ensure that the right clothing and equipment is worn correctly for the appropriate job

Action:

- a) safety footwear should be worn at all times when working with machinery
- b) safety helmets must be worn at all times when working with or in close proximity to cranes in the scrap metal yard
- c) all H.G.V. drivers and yard operatives must wear a reflective jacket at all times
- d) the correct eye protection must be worn when undertaking the following activities; working with any cutting, drilling or grinding machine/tool, using an oxyacetylene torch and welding, power washing and sheeting a skip
- e) ear protection must be worn in the designated areas
- f) all persons that receive Personnel Protective Equipment during Induction will sign a form stating what equipment they have received (H.S.E.F. 29)
- g) any additional equipment that is supplied should be stated and signed for on the Quick Issue PPE form (H.S.E.F. 30)
- h) Where PPE is needed and kept in a certain place it will be checked for wear/tear monthly (H.S.E.F. 22)

3.17 Plant & Machinery

Objective: To make sure that all plant and machinery is suitable and properly used and maintained

Action:

- a) Lifting Equipment: For Insurance purposes, all lifting equipment will be checked according to the schedule by an external company. All their recommendations have to be carried out within the specified time frame. Risk Assessments should be carried out on all crane lifting activities. Recommendations to be

followed to reduce any risk as far as is reasonably practicable

b) Compressed Air Equipment: All compressed air equipment should have a written scheme of examination associated with it. All compressed air equipment should be tested by an external company for insurance purposes. All their recommendations have to be carried out within the specified time frame

c) Electrical Equipment and points: All portable electrical equipment shall be identified with a serial number and recorded in a register [\(Document 17\)](#) The equipment will be checked every six months by the Group Health & Safety Representative who will organise any necessary maintenance [\(H.S.E.F. 31\)](#) It is the responsibility of each individual computer user to carry out simple daily visual checks on their workstation [\(Document 18\)](#) Any faults should be reported to the Health & Safety and Environmental Officer as soon as they occur. A competent person will then be sent to rectify the problem.

It is the responsibility of the Health & Safety and Environmental Officer to ensure that all tenants and properties have a valid electrical certificate renewed every 3 years together with PAT documents of no more than 6 months old [\(H.S.E.F. 32\)](#)

Electric check letters are to be distributed periodically by the H & S and E Officer to remind tenants of their responsibilities regarding essential electrical checks [\(Document 19.clashes with other 19\)](#)

d) Gas Equipment & Storage: All gas equipment to be checked on a weekly basis by the H & S and E Representative and any necessary maintenance

organised (H.S.E.F. 33). There is no legal requirement for any official training to be given to allow the employee to complete the necessary checks, however they do need to be competent. This has to be documented and signed by both the employee conducting the inspections and his/her manager. (H.S.E.F 52)

- e) All cylinders should be attached to either a magazine or to the fabric of the building
- f) General Plant: All plant should be checked daily by the operator (H.S.E.F. 34/35/36) any defects that can be safely rectified by the person filling in the above form should be done so. If this is not possible, the defect should be reported to the Company Manager who details the defect and the action to rectify it in the report section of the form. All forms should be collected weekly by the Group H & S and E Representative for filing.

An up to date list of qualified Fork Lift Truck drivers is to be kept on each company's Health & Safety and Environmental Notice Board (Sign Six)

3.18 Office Management

Objective: To comply with the Display Screen Regulations and make working in company offices as non stressful as possible

Action:

- a) all computer screens to comply with current regulations
- b) a Risk Assessment to be carried out for using workstations and following this, the necessary adjustments made to each user's position to ensure maximum comfort whilst carrying out the task (RA/workstations)

- c) all office staff to be issued with adjustable office chairs, sufficient space and proper workstations
- d) it is the responsibility of the each employee issued with a workstation to carry out daily visual checks on their workstation to ensure their health and safety whilst using the computer (*Document 18*)
- e) it is the responsibility of the Company Manager to ensure that employees take regular and adequate breaks from looking at their screens (5 minutes every 30 minutes) either by carrying out a non computer related task or by physically walking away from their desk
- f) it is the responsibility of the H & S and E Officer to encourage exercises and activities for workstation users that would prevent work related upper limb disorders (*Document 20. also called 19 higher up*)
- g) a yearly report will be conducted by the Health & Safety and Environmental Representative detailing each user's comments on their workstation (*Document 21*)
- h) it is the responsibility of the Company Manager to encourage the reporting of any aches or sprains or body tensions immediately when noticed
- i) adequate ventilation and light shall be provided in the office areas
- j) Nelson Mill is a non-smoking building
- k) Interior windows and glass partitions to be cleaned on a monthly basis throughout the Mill by the Health & Safety and Environmental Representative

3.19 Hazardous Substances

Objective: To operate a safe working practice and storage of hazardous

substances

Action:

- a) a C.O.S.H.H. Assessment is to be carried out and a Safe System Of Work based upon this Assessment, when a substance deemed hazardous to health is being used **(H.S.E.F. 37)**
- b) all flammable substances, such as paints and cooling oils to be stored in steel cabinets
- c) the containers shall be labelled and kept locked when not in use
- d) all employees must be made aware of the need to read all labels and store the substances correctly
- e) there will be adequate ventilation provided

3.20 Working at Heights

Objective: To operate a safe working practice when working at heights both indoor and outdoor

Action:

- a) a Risk Assessment is to be carried out by the H & S and E Representative in advance of any tasks that require working at height (if not covered by the Generic Risk Assessment for this particular activity **RA/Generic Working at Height**)
- b) A Safe System of Work must be produced by the H & S and E Officer or Representative, if the Generic S.S.O.W. does not cover the activity. This S.S.O.W. must then be acknowledged and adhered to by all personnel

undertaking the task

- c) For all indoor tasks, the appropriate ladders are to be used. In the case of step ladders, only those that are kite marked meeting 'Industry Standard' to be used
- d) For all outdoor tasks, the appropriate ladders or lifting equipment needs to be used and harnesses implemented where necessary as per the S.S.O.W.

3.21 Facilities

Objective: To provide adequate toilet, washing and canteen facilities

Action:

- a) toilets will be cleaned daily
- b) Washrooms will provide hot and cold water, soap and a means of drying hands. They will also be well lit and ventilated
- c) canteen facilities will be hygienic, have adequate seating and provide the employees with hot drinks
- d) it is a duty of the H & S and E representative to carry out a daily change of tea towels and a change of hand towels every other day in the canteen facilities
- e) to avoid cross contamination of germs, personnel will be instructed not to use tea towels for drying their hands (*Sign Seven*)
- f) wiping down cloths to be bleached daily by the cleaner for the area

3.22 Local Exhaust Ventilation (L.E.V.)

Objective: To ensure all local exhaust ventilations are correctly monitored and checked

Action:

- a) where a working practice exposes anybody to a substance harmful to a person's health, a C.O.S.H.H Assessment should be carried out **(H.S.E.F. 37)**
- b) where L.E.V. methods are needed, an occupational hygienist report is needed to evaluate the level of L.E.V. needed
- c) The L.E.V. systems will be tested every 12 months through a competent examiner. Records need to be kept for five years
- d) the Group Health and Safety and Environmental Representative should undertake a monthly check to visually check the L.E.V. systems are functioning properly **(H.S.E.F. 39)**
- e) all respiratory protective equipment to be checked monthly within the L.E.V. systems check **(H.S.E.F. 22)**

3.23 Manual Handling

Objective: To ensure that the risk to injury from manual handling is reduced

Action:

- a) a Risk Assessment to be used to assess the danger to injury **(RA/Manual Handling)**
- b) automate the lifting where reasonably practicable
- c) if automation is not possible provide training on correct lifting techniques **(H.S.E.F. 38)** and **(Document 22)**
- d) all employees to be given 'Manual Handling Training' as part of their Induction Training followed by refreshers periodically

- e) a C.O.S.H.H. Assessment is to be carried out and a Safe System Of Work determined when a substance deemed hazardous to health is being moved

3.24 Safeguarding of Machinery

Objective: To ensure that all machinery with dangerous moving parts (e.g. lathes, upright drills etc.) are adequately guarded

Action:

- a) The Group H & S and E Representative must see that all machines containing dangerous moving parts are adequately guarded with the *correct* guard. All machines are shown on a master list which is updated as new machines are acquired or old machines are scrapped **(Document 23)** A visual check of all machinery should be carried out every 6 months, which should include making sure that the guards are not only on the machine, but are set up correctly **(H.S.E.F. 40)**
- b) when a machine is not sufficiently guarded, the person who notices the inadequacy should immediately inform the Group H & S and E Officer who should inform the Company Manager to arrange a suitable schedule enabling either the correct guard to be installed or the original one maintained
- c) if there is any uncertainty regarding the suitability of guards the Group H & S and E Officer should be informed who will then find the correct information
- d) the annual Health & Safety and Environmental Audit will look at a cross section of machines to see that they are adequately guarded and the guards correctly positioned

- e) Under NO circumstances should a guard ever be removed from a machine other than for maintenance or cleaning purposes. A supervisor should always be informed if this is the case and after the procedure has been completed, the guard should be immediately repositioned safely on the machine prior to resuming use

3.25 Abrasive Wheels

Objective: That the relevant companies in the group have persons deemed competent in the use of abrasive wheels

Action:

- a) if a company does not have enough trained people, then the Company Manager must ensure that other employees receive training on the correct way to mount and inspect abrasive wheels
- b) only competent persons may change, mount and inspect abrasive wheels
- c) guards shall be provided on all abrasive wheels and be inspected regularly for any signs of wear by the Group H & S and E Representative
- d) Where appropriate, the speed of the wheel should be indicated on a notice. The Group H & S and E Officer should be consulted if there are any uncertainties
- e) It is the job of the Group H & S and E Representative to ensure the above is carried out. Monthly checks are necessary to ensure that only competent persons change and mount abrasive wheels and that guards applied are adequate and maintained properly *(H.S.E.F. 41)*

3.26 Driving Company Vehicles

Objective: To have systems in place to ensure that all drivers within the Group understand their responsibility to drive carefully and to respect the vehicle as company property, taking into consideration fellow colleagues who may have to use the vehicle from time to time

Action:

- a) to ensure that all personnel, including new starters, who drive *or could be asked to drive* a company vehicle, are issued with the relevant documents and items that together create the 'Hargreaves Hamilton Drivers Pack' (*H.S.E.F. 42 or H.S.E.F. 43 dependant on their driving status*). This form embellishes the Driving Safe System of Work (*SSOW/Driving*), the procedures if a road traffic accident occurs (*Document 24*) and finally two Accident Report Forms (*Document 25*) It also contains a disposable camera (*Item 1*)
- b) To ensure that *all vehicles* are always equipped with a 'Driver's Pack' which includes the necessary paperwork/disposable camera if the vehicle is involved in a road traffic accident. It is the responsibility of the H & S and E Representative to check that these packs are in the vehicle and up to date on a monthly basis (*H.S.E.F. 44*)
- c) it is the responsibility of the H & S and E Officer to collate driving licenses from all personnel + their partners who drive a company vehicle on a yearly basis

- d) As from 1st July, 2007, all company vehicles will be 'non smoking' units in line with Government Regulations. 'No Smoking' Signs will be on display in all company vehicles

3.27 Traffic Management System

Objective: To ensure through a comprehensive management system that the flow of vehicles and pedestrians are, where reasonably practicable, kept separate. Also that access and egress from site is unhindered for both types of traffic

Action:

- a) to conduct a comprehensive Risk Assessment to realise the danger of vehicle and pedestrian integration around the site *(RA/Traffic Management)*
- b) from this Risk Assessment, to create a Traffic Management System which sufficiently segregates vehicles from pedestrians
- c) to train all personnel on Traffic Management through the use of the Safe System of Work created *(SSOW/Traffic Management)* This training should be incorporated into the Induction Training for all new starters
- d) sufficient signs to be erected to ensure the safe flow of vehicles and pedestrians around the site
- e) designated areas of car parking set out to ensure pedestrian safety
- f) specific pedestrian crossings to be clearly marked and used
- g) traffic calming equipment in place at the exit of the one way system to ensure
 - 1) no vehicles enter the property against the one way system and 2) vehicles slow down before reaching their entry onto Gaskell Street/public crossing

between pavement stretches

- h)** it is the responsibility of the H & S and E Representative to keep the traffic calming equipment in working order and to ensure that it is swept clean of debris and power washed on a monthly basis

3.28 Mobile Telephones

Objective: To avoid any unnecessary distractions caused by mobile telephones when operating machinery

Action:

- a)** Private mobile phones are not to be carried at any time by personnel operating machinery. Any private mobile phones brought to work are to be left in lockers during working hours
- b)** any personnel issued with company mobile phones should switch them off should they operate machinery
- c)** Any personnel using company mobile telephones inside a company vehicle should make sure that there is a hands free kit installed. It is the responsibility of the driver to ensure that the mobile phone is put into this cradle before starting the engine. It must remain in the cradle throughout the journey and must be removed from the cradle only once the engine has stopped and the driver is exiting the car. The Group H & S and E Officer should be contacted immediately to provide such kits if found to be absent from a company vehicle or if found to be faulty in some way
- d)** to advise employees to pull over to a safe stopping place on the side of the

road before using the mobile phone, even though it is in a hands free kit, as any driver can be prosecuted for using a hands-free mobile phone if he/she fails to have proper control of the vehicle when using it

3.29 Contract Working

Objective: To enable Hargreaves Hamilton employees to operate safely when working as contractors at sites owned by another organisation

Action:

- a) this is written down in a separate Policy titled 'Contract Working', so that it can be used as a document on site or when tendering for a particular contract if such a document is required *(H.S.E.F. 45)*

3.30 Subcontract Working

Objective: To enable sub-contractors to work safely both at our own premises as well as on sites owned by other organisations on our behalf

Action:

- a) This is written down in a separate Policy titled 'Sub-contracting Work'. All sub-contractors will receive a copy of the Policy and sign the form on the final page agreeing to abide to the company's rules and conditions *(H.S.E.F. 46)*
- b) this form must be returned together with the supporting documents requested *as well as* the completed Sub-contractor's Questionnaire *(Document 26)* before any work will be allowed to commence
- c) Each company will have a running list of all approved sub contractors.

(Document 27/Gears, 27/LTCE, 27/J. Doyle, 27/Engineers, 27/HH & Co, 27/Barton Lake, 27/J & D Andre)

3.31 **Safety and Environmental Tours**

Objective: To enable Company Managers to keep abreast of activities within their surroundings, which could potentially be overlooked during the regular day to day running of the company

Action:

- a) a quarterly schedule is to be drawn up each year and distributed to all company managers stating the dates and times of their individual tours (Document 28)
- b) it is the responsibility of the Company Manager to notify the H & S and E Officer if he/she is unable to attend the tour, so that it can be rescheduled
- c) the meeting place for the tour is always the office of the Company Manager
- d) The tour is to cover the immediate premises where the Manager works. All information is to be collated during the tour (H.S.E.F. 47)
- e) any close out actions are to be diaried by the Company Manager and it is the Company Manager's responsibility to ensure these are completed within the stated time frame

3.32 **Environmental Housekeeping**

Objective: To ensure that all employees adhere to the General Environmental Housekeeping Rules (Document 29) as stated in the Employee Handbook and that the company adheres to these rules set out in the Waste Management Policy (Document 30)

Action:

- a) to ask each new starter to acknowledge and abide by the Environmental Housekeeping Rules at their Induction Training (H.S.E.F. 48)
- b) to ensure that the Environmental Housekeeping Rules are posted on the H & S and E Notice boards at all times.
- c) It is the responsibility of each Company Manager to ensure that the Environmental Housekeeping Rules are being kept to in their areas as requested by the H & S and E Officer; which include continuous recycling/reusing/waste reducing activities such as the correct use of paper-chase bins, cartridge/toner recycling, scrap metal collection, battery's etc.
- d) the H & S and E Representative is to monitor that all staff are following the Environmental Rules by conducting monthly checks (H.S.E.F. 49)
- e) the H & S and E Representative must inform the H & S and E Officer if there are any repeat offending employees or indeed companies where there is poor Environmental Housekeeping apparent on a repeat basis
- f) it is the responsibility of the H & S and E Officer to actively encourage all employees *and* tenants to abide by the Environmental Housekeeping Rules using the various communication channels (email, memo, signs) so as to ensure all personnel on site receive the same level of encouragement
- g) it is the responsibility of the H & S and E Representative to empty all shredding machines daily; paper chase bins weekly; as well as, collect monthly all cartridges/toners into the Tonor Donor box located in the Archives room
- h) the H & S and E Officer is to communicate with the Stationary Purchaser for

the Group to ensure recycled paper is purchased whenever possible

- i) the H & S and E Officer is to communicate with all Purchasing Personnel in the Group to ensure they are considering environmentally sound options/alternatives in their roles

3.33 Environmental Targets

Objective: To continually assess the impact that our organisation has, or could potentially have, in the future to the environment. Aims and objectives followed by targets can be set to ensure the entire workforce is working towards the same goal of minimising our impact on the environment

Action:

- a) the H & S and E Officer is to continually assess the consumption of energy, water and goods/raw materials plus other potential impacts to the environment that could occur
- b) the H & S and E Officer must instruct the H & S and E Representative to carry out Risk Assessments where necessary
- c) the H & S and E Officer is to set clear aims and objectives for employees to incorporate necessary changes in equipment/equipment usage to allow less environmental impact where deemed possible
- d) Once these objectives have been created, targets can be set in line with Environmental Bodies such as the Carbon Trust. These are to be communicated to the H & S and E Representative and also to the Company Managers

- e) the H & S and E Representative must ensure that the central heating boiler is completely closed down on 1st of July and not turned on again until 1st September at the earliest each year
- f) the H & S and E Representative must also ensure that the central heating boiler is turned off at source during the Christmas break
- g) it is the responsibility of the Company Managers to conduct tool box talks with their staff to ensure that all are aware and acknowledge these environmental objectives (*H.S.E.F. 28*)
- h) targets are to be supplied by the H & S and E Officer in a graph format for display on the Health & Safety and Environmental Notice Boards for easy referral (*Document 31*)

3.34 Road Side Care Scheme

Objective: To ensure that the stretch of Gaskell Street where Nelson Mill is situated is kept in a good condition and litter free

Action:

- a) the H & S and E Representative is to conduct weekly checks of the stretch of Gaskell Street directly outside the Nelson Mill to ensure it is neat and tidy collecting litter when found
- b) The bins provided outside the Mill are also to be emptied on a weekly basis by Bolton Metropolitan Council. The H & S and E Representative needs to telephone to remind the Council if the bins are overflowing (01204 336632)
- c) The car park at the side of the cottages on Gaskell Street to be kept in a clean

and organised state. This is the responsibility of the H & S and E Representative to ensure this is done on a monthly basis.

- d) The windows on the exterior of the Mill to be cleaned on a monthly basis by the H & S and E Representative

3.35 Charitable Contributions

Objective: To continue to contribute on an ongoing basis to Bolton Lads and Girls Club and also to other charities when opportunities and events arise

Action:

- a) the H & S and E Officer is to keep abreast of fund raising opportunities from Bolton Lads and Girls Club and also other charities such as Bolton Hospice
- b) the H & S and E Officer is to ensure that information of these events is available to the entire workforce using our various communication channels including the Notice Boards
- c) the H & S and E Representative is to assist when needed to distribute this information
- d) to continue to donate the remuneration received from the tonor/cartridge collection box to Bolton Lads and Girls Club
- e) to continue to run a Christmas Card Collection Box in aid of the Bolton Hospice where by staff are encouraged to donate money into a box and wish their colleagues a verbal 'Merry Christmas' rather than sending a Christmas Card

3.36 Process of Complaints

Objective: To ensure that all complaints are dealt with in a professional and

efficient manner

Action:

- a) All complaints are to be directed to the H & S and E Representative. If the H & S and E Rep deems necessary, he/she has the authority to request the complaint in writing
- b) the H & S and E Representative must then inform the H & S and E Officer of the complaint
- c) the H & S and E Officer must then take responsibility for the issue that has arisen and deal with it in a satisfactory manner to ensure both parties are content with the outcome