

Health & Safety Policy Group

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Section A1 - General statement of policy

The organisation recognises its statutory duty under the Health and Safety at Work etc Act 1974. Therefore, this policy, is So Far As is Reasonably Practicable (SFARP), to ensure that the organisation provides and maintains safe and healthy working conditions, safe equipment and systems of work for all our employees, and to provide as much information, instruction, training and supervision as they need for this purpose. We also will ensure SFARP there are no risks to health in the use, handling storage and transportation of articles and substances.

We also accept our responsibility for the health, safety and welfare of other people including visitors and contractors who may be affected by the organisation's undertaking.

The allocation of duties for safety matters and the particular arrangements, which we will make to implement this policy, are set out below. Health and Safety is seen as a key company issue and will be pro-actively managed as a line management function.

The policy will be kept up to date, particularly as the business changes in nature and size. To ensure this, the policy and the way in which it has operated will be reviewed every year.

Signed:

Date:

Position:

Responsibilities for Health & Safety

Particular individuals' responsibilities are laid out below. A diagram showing the structure of the company is included.

1. Managing Director

The Managing Director, Richard Gillgrass, is ultimately responsible for the overall running of the company including health, safety and environmental matters.

It is the responsibility of the Site Directors to oversee the line management arrangements and to ensure that sufficient time resources are given to line managers to fulfil their functions. Additionally, health, safety and environmental matters are to be made a standing board meeting agenda item.

2. Directors

The Directors are responsible for the overall implementation of the policy in their own sections of the business.

Richard Pinkney,
Business Development Director / Site Director Leeds.

Peter Clayton,
Finance Director / Site Director Theale.

Steve Middleton,
Sales Director / Site Director Leicester.

The organisation has appointed Richard Gillgrass, Managing Director, responsible for the management of Health and Safety across the Celloglas Group of companies. It is the responsibility of the Directors to report the performance of their areas to the board and to ensure that their managers are implementing the health, safety and environmental policies and their objectives. Additionally, they must ensure that all staff in their sections is competent and committed to the management of health, safety and environmental matters and to provide training and communication for all staff.

3. Site Manager

Each site manager has the general day-to-day responsibility in their business for health, safety and environmental matters. It is to be managed in parallel with production and quality issues.

In particular these managers should ensure:

- All new and reassigned employees have drawn up an appropriate induction training programme including fire safety and specific job training relating to the risks likely to be encountered in their section of the business.
- Carry out / review risk assessments.
- Promote and ensure compliance with safe working practices developed within the risk assessment process (including general risk assessments, COSHH, manual handling, etc.)
- Ensure good housekeeping standards are maintained.
- Carry out accident / incident / ill health investigation in their section in accordance with the laid down procedures
- Notify, manage and supervise contractors in accordance with the "Control of Contractors" laid down procedures.
- Minimise waste, use of energy in accord with the - Environmental Policy.
- Ensure a "Workplace Inspection" is undertaken on a monthly basis, and sent to Head Office for inspection by the Managing Director. Please refer to Appendix 1

Responsibilities for Health & Safety

Site Supervisor

The Site Supervisor / Team Leaders will manage health, safety and environmental matters as part of their day to day duties.

In particular they will:

- Deliver induction and existing employee training/retraining.
- Aid in the risk assessment process.
- Promote and ensure compliance with safe working practices.
- Ensure good housekeeping standards are maintained.
- Fulfil their duties in the accident / incident / ill-health reporting procedure.
- Oversee weekly / daily machinery and personal protective equipment (PPE) checks.
- Minimise waste and use of energy in the premises. Inspect equipment such as lighting for faults.
- See that identified walkways are kept clear of obstructions.
- Ensure fire alarms, extinguishers and fire escape routes (internal & external) are maintained, kept clear and unobstructed at all times.

Responsibilities for Health & Safety

Employees

All employees have the responsibility to co-operate with supervisors and managers to achieve a healthy, safe and environmentally friendly workplace and must take reasonable care of themselves and others. Wherever an employee notices a health, safety or environmental problem, which they are unable to put right, they must immediately inform their line manager, and complete a Hazard Report Form. Please refer to Appendix 2.

In addition, if an employee has any other concern relating to health, safety or welfare, he / she should discuss this with their line manager. Employees may, however, if unsatisfied with the result of those discussions, report their concerns in writing to their relevant Director.

Employees must also be aware of their legal obligations under Sections 7 and 8 of the Health and Safety at Work etc Act 1974. These require employees to take reasonable care of themselves and others and to not recklessly interfere with anything provided in the interests of health and safety.

Employees must use any personal protective equipment (PPE) provided by the business. Lifting equipment and all safety features on workplace machines and equipment provided must be used / operated in the manner, as instructed / trained.

Health, Safety & Environmental Adviser

The BPIF (British Printing Industries Federation) will act as the Health and Safety Competent Person under the Management of Health and Safety at Work Regulations 1999. He / she will act as an adviser to aid line managers in the management of health, safety and environmental issues primarily through the senior management.

The competent person will report performance to the board and arrange a yearly review of the Health, Safety and Environmental Policy. He will also arrange for the yearly audit of the companies health, safety and environmental performance.

Equipment maintenance

It is imperative that plant and equipment is adequately maintained to ensure that it is in safe working condition. To ensure that these important activities are undertaken appropriately maintenance of all equipment will be under the control of the Factory (Site) Director / Site Management team.

General arrangements for Health & Safety

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Accidents

The organisation is aware of its responsibility under the Health and Safety (First Aid at Work) Regulations 1981, and has carried out an assessment of the organisation's undertaking to identify the correct first aid facilities, to aid employees or visitors / contractors on site in the event of illness or a workplace accident.

The organisation has appointed a number of competent first aiders to administer first aid, if in the event of a workplace incident causing harm or that a member of staff or visitor / contractor to the site becomes unwell.

First aid boxes are located across the site (see local signage for the exact locations)

The company's trained first aiders are listed on all notice boards.

The appointed person responsible for the first aid boxes is the site manager.

In the event of an unforeseen accident or incident which leads to injury to a member of staff or visitor / contractor that requires off site medical treatment either at a local medical centre or local A&E department, it will be the responsibility of the site Manager / Director is to notify the next of kin or family member of the incident.

In the event of an accident / incident involving a visitor / contractor to the site, then the aforementioned process will be followed notifying the visitors / contractors employer.

The injured party, first aider or appointed person should enter the details into the accident book on the day of the accident and ensure the injured person's line manager is informed so that the investigation process can be started.

The accident record book is located in the main office of each site.

In the event of a workplace accident, the First Aider will manage the situation, first administer aid and/or call for medical assistance (9-999).

Workplace accidents / incidents will be investigated by the relevant site Manager in a reasonable time frame and documented upon the organisations incident investigation form. In the event of a serious accident to the HSE (see below).

The findings of the investigation will be escalated appropriately and any identified additional control measures to mitigate the risk of reoccurrence and impact, will be implemented. If the identified control measures require a significant capital investment, then this shall be escalated by the site manager to one of the named Directors for funding.

Insignificant injuries, for example, minor cut / paper cut or splinter to the finger, will not be subjected to a formal investigation, however, it must still be recorded in the site accident book.

Written records will be maintained of any investigation following an accident / incident or any interviews with witnesses etc. A full management review of systems and safe working practices will then be undertaken to prevent any reoccurrence. Site Managers must start / open a new folder, to hold all the relevant information that is obtained during an accident investigation. (Accident form, photographs, investigation form etc).

The Site Manager must inform and update the Manager Director during the investigation process. If required, the Managing Director will contact the BPIF competent person to assist in the investigations or purely in an advisory capacity.

Accidents

In the event of the incident meeting the criteria of a reportable accident / incident under the Reporting of Injuries Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR), then Richard Gilgrass, the Managing Director, would be responsible for reporting the incident to the Health and Safety Executive (HSE), using the online system www.hse.gov.uk/riddor

In the Managing Director's absence from the organisation, this task would be carried out by the site manager at the site where the incident / accident occurred. The Managing Director would then be brought up to speed upon their return to the business.

The site Manager will submit a monthly report to the Managing director, highlighting any types of incidents (slips and trips. Manual handling etc.), that have occurred within the organisation, with the outline of the programme of work required to prevent any reoccurrence / impact.

Note: All incident investigation forms will be kept at the Celloglas Group Head Quarters, located in Theale, for archiving for a minimum of three years (please also retain a copy on site).

Artificial Optical Radiation (UV light)

The Artificial Optical Radiation Regulations 2010 require the employer to protect the eyes and skin of his employees that may be exposed to hazardous sources of artificial optical radiation such as ultraviolet, infrared and laser beams.

The organisation has identified such sources of light from its processes and assessed the exposure points and typical exposure scenarios that could affect an operative or other employee from exposure to hazardous sources of light, for example, UV curing of inks.

Key staff will receive a suitable level of education and instruction on the correct positioning of shields and guards, their maintenance and if required correct wearing of any personal protective equipment issued to them. This will be delivered by the site manager or their appointed deputy. Machine operatives are required to check the condition of the machine guards or screens for damage and 'light' leakage and on discovery of any faults, report this to the site manager immediately for rectifying.

Asbestos

The organisation is aware of its responsibilities under the Control of Asbestos at Work Regulations 2002, whether it owns, occupies, manages or has general responsibilities for the non-domestic premises.

The organisation has carried out an asbestos survey at each of its sites during 2004, whereby a 'Type.2' level survey was undertaken to determine whether there is Asbestos Containing Materials (ACM) within the buildings and if present its magnitude. Any ACMs identified will be managed through local procedures in line with the asbestos register.

The report covering each of the site surveys is kept at the Celloglas Head Quarters in Theale, with a copy being sent to the relevant site managers. The current status will be kept under review by each site manager and the directors when considering any future alterations, building works, refurbishments or maintenance to and upon the premises.

No person is permitted to undertake any alterations or maintenance upon the premises unless they have been authorised to do so and only after reviewing the site survey report and register.

Assessment of Risks

The organisation is required under the Management of Health and Safety at Work Regulations 1999 (as amended 2005) to undertake risk assessments.

The risk assessment process will be overseen by the competent person(s). However, each site manager has been trained in the process to identify workplace hazards and then identify and implement practicable control measures to mitigate the residual risk of injury.

The risk assessment process will be supported by an external competent person(s) from the British Printing Industries Federation (BPIF). However, each manager will have to participate in their own risk assessments as a part of the process of applying the appropriate and safe working practices to each individual working environment.

All significant risks will be assessed. As a result of these assessments, appropriate action will be taken to ensure that all reasonable and practicable controls measures are identified and implemented, to ensure compliance with the law. Records of the assessments are to be held on the main Celloglas server under J:\EHS Folder\Site Folders\Machinery & Workplace Risk Assessments.

The relevant site manager, assisted by the BPIF HS&E Adviser, will review the organisations risk assessments annually. However, those assessments will be reviewed sooner in the event of a process change, incident / accident, member of staff suffering from a potential occupational ill health problem, employment of a 'young person', pregnant lady (employee) or an individual identified with a disability.

Auditing

The organisation is committed to a continuous improvement programme. A yearly audit of the management system and performance will be carried out by the BPIF HS&E Advisers. Those audits shall be undertaken on both corporate and site specific policies and topics identified.

Contractors and Visitors

No-one will be allowed to conduct any kind of work upon a Celloglas site unless authorised in writing by the SITE MANAGER who will be responsible for their safety arrangements at all times whilst on the premises. All contractors and visitors must sign the visitors' register on arrival and sign out on their departure.

Before a contractor is allowed to start work on the premises, the manager responsible for engaging the contractor will agree with the contractor a safe system of work which will ensure the safety of the contractor's employees and this company's staff. Additionally the manager will ensure that a copy of the Celloglas Health & Safety Policy has been forwarded to the company and that they have completed a Pre-Qualification Questionnaire for Contractors. The site manager or their appointed deputy will also check that the agreed safe system of work is adhered to once work starts upon site through to when the work is finished and the site left in a safe condition prior to the contractor leaving the Celloglas site. Please refer to Appendix 3 for Contractors Questionnaire.

Display Screen Equipment and Workstations

The organisation is fully aware of its duty under the Display Screen Equipment Regulations 1992 (as amended 2002) and therefore, conducts workstation risk assessments on employees who habitually use such equipment. All staff that makes use of display screen equipment as a significant part of their job is entitled to a free eyesight test, paid by the Company upon request.

If the optician recommends that the employee should wear corrective lenses, for short distances, that of which would constitute a users' vision to screen distance, the organisation will pay for the most competitively priced glasses available or award a maximum of £45 (amount subject to annual review) towards glasses of the employee's choice. Should the employee decide to have a more expensive frame, any additional remaining expense will be the individual's responsibility.

In all cases, the employee will be required to produce documentation from the optician stating clearly that glasses are a necessary requirement for the employee in order for them to continue working with a display screen.

It is up to the individual to initially pay for the service and present a receipt to the organisation, to claim for expenses upon the business expenses form found upon the server company on Reading / Expense Claim form.

Driving Company Vehicles

The organisation is aware of its duty of care with regards to the use and maintenance of company vehicles.

Maintenance of vehicles required under the Road Traffic Act and the management of Health & Safety at Work Regulations.

Staff who have been provided with a company vehicle or who have the option of 'cash for keys', or allocated a vehicle will be responsible for the day to day management and maintenance of that vehicle, in accordance with the manufacturers guidelines as laid out in the service history documents, in conjunction with the company's fleet management providers.

All company vehicle drivers are required to check their vehicle for oil, water and screen wash levels as well as the condition and tread of all tyres to ensure it is roadworthy and to report defects to their site manager immediately so that the fault can be rectified by the specific dealership.

The organisation has appointed Fleet Risk to be responsible for undertaking regular checks on the licenses of those employees who drive company vehicles, hire a car or use their own vehicles in the course of the company business. All of the above are responsible for advising their Manager of any penalty points awarded and or any withdrawal of their license, irrespective of the duration of that withdrawal.

Employees who are authorised to drive company vehicles; whether car or van etc.; shall be covered by the business insurance policy.

Employees driving their own vehicles for the organisations interests must ensure that the vehicle is insured for business use. The employee will be required to provide assurance of this requirement by showing their certificate of motor insurance to their Manager each year.

Each Site Manager will be responsible for ensuring that the relevant photocopies of the individuals driving license and of the driver's motor assurance (where applicable) are taken and passed onto the finance department to ensure compliance with this policy.

Driving Company Vehicles - Planning a journey

Planning a journey – Before commencing a journey a driver shall ensure that:

- They are fit to drive taking into account any tiredness, sickness, medication that may cause drowsiness and the effects of any residual alcohol.
- The vehicle is in a roadworthy condition.
- The driver is aware of the current road conditions, the weather forecast and their route.
- Where adverse weather conditions such as snow or fog are present at the start of the journey, the journey should be discussed with your Manager and alternative arrangements agreed.
- If the journey is too far to be completed comfortably in a day, that arrangements have been made for an overnight stay. (Note: if an immediate return is necessary, the driver should consider and discuss with his / her manager the use of other transport).

During the journey the driver should:

- Adhere to the national speed limits
- Stop for a 15 – 30 minute break every 2 – 2.5 hours of driving.

Managers of high mileage drivers should be aware of the hours worked and driven by their staff to ensure that these guidelines are adhered too.

Mobile phones

All employees must comply with the law on the use of mobile phones at all times. Caught? No Excuse!

It is a criminal offence; therefore, vehicle drivers are not permitted to use handheld mobile phones whilst driving their vehicle. Incoming calls should be allowed to divert to the voice message service and be obtained when the vehicle is parked in a safe environment.

All though it is permitted for short calls to be made or received by vehicle drivers with hands free / Bluetooth systems fitted to their vehicles, drivers should note that using a hands free phone whilst driving is distracting and can still result in prosecution for failing to have proper control of the vehicle.

Car drivers with hands free sets must:

- May take calls for short duration i.e. brief message only.
- After taking the short message, pull over when safe to do so and park in a safe environment to return or make a call.

With the exception of emergencies, Managers should avoid making telephone calls to staff whilst they know they are on the road.

Electrical Equipment

The organisation is aware of its responsibility to maintain electrical items so that they are safe to use and handle to comply with the requirements of current legislation. Therefore, the organisation has appointed a third party company to be responsible for conducting all portable appliance testing (PAT) on all hand held and moveable electrical equipment.

It is the responsibility of the engineer to maintain a company inventory off all electrical items that require maintenance and PAT testing. Each Site Manager is required to notify the engineer of any changes to their portable electrical equipment on site, i.e. new equipment, faulty equipment or discarded items.

A qualified electrical contractor will carry out all electrical repairs.

No person is to bring on site their own electrical appliances. If staff wish to bring electrical items on site to use within the workplace, the electrical item will need to be added to the organisation inventory list and PAT tested prior to use.

All portable electrical equipment in the factory will be inspected annually by a competent person. All portable electrical equipment in the offices will be inspected in line with HSE guidance.

The fixed electrical installation will be inspected every 5 years by a competent electrical engineer, which will be arranged by the Site Manager.

Flammable Substances

The main hazards involving flammable substances are fire and explosion, toxic vapours, and toxic dermatitic effects due to contact with the skin. In an environment where employees are working with combustible substances it is vital that the risk of accidents / incidents be reduced by adopting the following precautions: -

- Ensuring all persons who are using flammable liquids are adequately trained.
- Ensuring that leaks of liquid or vapour cannot occur, by using containers which are adequately filled and undamaged.
- Ensuring adequate ventilation where flammable liquids are used in enclosed areas.
- Ensuring appropriate storage of flammable liquids i.e. a locked metal cabinet.
- Smoking is prohibited.
- Appropriate fire fighting equipment is well maintained and readily available for use.
- Ensuring that rubbish and waste material, including contaminated rags, are kept to a minimum at all times.
- Ensuring that flammable liquids are properly disposed of immediately and appropriately (this includes aerosol containers).
- Ensuring risk of sparks or heat generation in vicinity of flammable / combustible substances is minimised.

The organisation is committed to keep flammable substances to a minimal quantity within the Print factory. A flammable goods store is located on each site and is highlighted by the appropriate signage.

A Dangerous Substances and Explosives Atmospheres risk assessment will be carried out alongside the COSHH assessments.

General Fire Safety

The organisation is fully aware of its responsibilities under the Regulatory Reform (Fire Safety) Order 2005, and is dedicated to ensure the preservation of life as a priority above all else.

Under the Regulatory Reform (Fire Safety) Order 2005, Richard Gilgrass, Managing Director is the responsible person for fire safety for the organisation and shall satisfy himself that all policies and procedures put in place under that order are carried out in order to discharge his duties. The responsible person, either on their own or with any other responsible person, must as far as is reasonably practical make sure that everyone on the premises, or nearby, can escape safely if there is a fire.

The Directors recognise the importance of the safe evacuation of buildings being undertaken quickly and efficiently in the event of a fire breaking out on site. To this end, an audible fire alarm system is installed in all of the organisations buildings.

Escape routes will be checked every day by the Site Manager or their appointed deputy.

Line managers will carry out fire prevention inspections every month. (Workplace inspection form Appendix 1

Fire extinguishers will be checked by an external competent assessor every year.

Emergency lighting units will be tested by the site manager or their deputy. One emergency lighting unit will be tested every month. This test will be documented in the appropriate logbook. Fire alarms will be checked by the Site Manager or their deputy every week.

Fire drills will be held every year organised by the Site Manager or their deputy covering all staff and each shift.

A fire risk assessment for the employer's premises will be carried out and reviewed annually. Any fire hazards identified or hazards which are not suitably controlled will be highlighted to the management team for actioning.

All flammable and highly flammable materials will be segregated and only sufficient quantities for a day's production brought into the work areas.

Smoking is not allowed on the premises or in company vehicles.

In the event of an evacuation staff within the print area will be accounted for by the use of the roll call. Office staff will be accounted for by the use of the roll call.

Visitors will be checked against the visitor's signing in book and will also be the responsibility of the member of staff they are visiting, and will be guided to the assembly point by any member of staff.

Procedures for actions in the event of fire and on hearing the alarm are posted around the building. It is the responsibility of each SITE Manager to ensure that newly appointed staff are made fully aware of the Alarm and Evacuation Policy of their site during the induction process on the first day of employment. This must also be extended to cover Contractors & Visitors who are working on site unaccompanied by a member of the Celloglas staff. See Appendix 4.

Hazardous Materials

Hazardous Materials (Control of Substances Hazardous to Health (COSHH))

Material safety data sheets for all materials will be obtained from suppliers prior to materials being brought onto site and put into use. The risks associated with hazardous materials will be assessed and safe systems laid down for the storage, handling and use of all such materials.

Staff will be trained to use the materials and receive instruction so as to be able to recognise the substance hazards by the labelling. Appropriate protective clothing will be provided as necessary in line with the requirements of the manufacturer's safety data sheets and COSHH risk assessments.

Documents relating to these assessments will be located in the site manager's office in hard copy form and on the business server under J:\EHSfolder\sitefolders\Newcelloco-Celloglas Sites.

All new materials will be subject to assessment for potential hazards and a safe system established before they are used.

Hazard Reporting

Any member of staff who identifies an uncontrolled hazard that has the potential of causing an injury must report the issue at once to their supervisor or to their line manager to action. The hazard reporting form will also be required to be completed for business health and safety records. Any member of staff may complete the hazard reporting form.

Once completed, the form must be submitted to the relevant Site Manager and if required, copied and passed on to one of the Directors.

Any visitor or contractors visiting a Celloglas site, that is exposed too, or is aware of any uncontrolled health and safety hazard, should notify their host immediately. The host will complete the hazard reporting form and action it as explained above.

Health Surveillance

Where risks to health have been identified through the risk assessment process, the company will put in place appropriate health surveillance measures to safeguard the health of its employees. Employees should inform their line manager or supervisor immediately of any signs of work-related ill-health so that the appropriate measures can be taken.

Housekeeping and Premises

All areas will be cleaned daily and waste cleared from production and office areas each day. Site managers should encourage a clean as you go culture across the business. Materials will be stacked at safe heights in the allocated areas. Free-standing pallets will be stacked to a maximum of 3 pallets high except where the arrangement is such that the pallets could not fall onto a work area or gangway.

All gangways and exits will be marked and kept clear at all times.

In-House Engineering / Maintenance work

Where engineers are undertaking work in one of the company's departments or where their work may affect a department, they should inform the departmental managers prior to commencing work. The usual formal risk assessment process will apply.

Any maintenance work carried out upon any of the machinery or equipment again will be formally risk assessed to identify any significant hazards. The proposed work will be carried out in line with the manufacturer's handbook or guidance documents and where required, follow the isolate and lock off procedure 'Lock Out – Tag Out' if exposed to a danger zone.

Any safety systems, devices or guards removed for the maintenance or repair task must be replaced by the engineer and checked for correct operation and that it is secured before formally handing the machine as fit for purpose back to the operatives.

Any guards or safety devices must be replaced with correct type of materials and safety system as defined within the Essential Health and Safety Requirements (Supply of Machinery Regulations) and suitability under the PUWER regulations.

Machinery and Equipment

Only trained and authorised employees will operate specific machines or work equipment. Prior to starting-up a machine or piece of equipment, the operator must check that guards are in place and in working order. Guard performance checklists will be completed every week by the machine operators and monitored by management on a monthly basis. Refer to appendices 2 and 3 for checklists.

The following special items of plant and equipment will be checked at the appropriate intervals by a competent person:-

- Fork Lift Trucks - 6 monthly
- Guillotines - 6 monthly
- Local Exhaust Ventilation - 14 monthly (at least)
- Pressure Systems - 2 yearly or in line with the written scheme of examination.
- Safety Cage - 6 monthly

The above will be arranged by the Site Manager under the organisations Service Level Agreement (SLA) with Allianz insurers. The site manager must be kept informed of when inspections / testing will be conducted at the relevant sites.

Pressure systems meeting the criteria of statutory inspections shall be inspected in accordance with the engineer's written scheme of examination as set out by the manufacturer and the engineer's inspection schedule.

Records of these inspections will be kept by the Celloglas engineer and individual site copies held in the relevant site manager's office.

Access equipment will be inspected by a competent person every six months. It is the responsibility of the site managers to arrange for this to occur on their own access equipment e.g. ladders and steps, etc.

The main hazards involving flammable substances are fire and explosion, toxic vapours, and toxic dermatitic effects due to contact with the skin. In an environment where employees are working with combustible substances it is vital that the risk of accidents / incidents be reduced by adopting the following precautions: -

- Ensuring all persons who are using flammable liquids are adequately trained.
- Ensuring that leaks of liquid or vapour cannot occur, by using containers which are adequately filled and undamaged.
- Ensuring adequate ventilation where flammable liquids are used in enclosed areas.
- Ensuring appropriate storage of flammable liquids i.e. a locked metal cabinet.
- Smoking is prohibited.
- Appropriate fire fighting equipment is well maintained and readily available for use.
- Ensuring that rubbish and waste material, including contaminated rags, are kept to a minimum at all times.
- Ensuring that flammable liquids are properly disposed of immediately and appropriately (this includes aerosol containers).
- Ensuring risk of sparks or heat generation in vicinity of flammable / combustible substances is minimised.

The organisation is committed to keep flammable substances to a minimal quantity within the Print factory. A flammable goods store is located on each site and is highlighted by the appropriate signage.

A Dangerous Substances and Explosives Atmospheres risk assessment will be carried out alongside the COSHH assessments.

Machinery and Equipment

All new machinery and equipment purchased will be formally risk assessed as required by the Provision and Use of Work Equipment Regulations (PUWER) 1998, and if required further control measures identified by that assessment will be put in place before the machinery or equipment is put into use.

The organisation will ensure that operatives of new machinery and equipment will be suitably trained in the correct setting, use and cleaning of the machine, in line with the operator's manual. Training will be organised with the supplier or installer of the equipment, and records maintained of the training provided.

The site manager will ensure that the training provider supplies certification for each attendee and those certificates are placed in the individuals HR folder.

Manual Handling

Manual handling operations will be avoided as far as is reasonably practicable where there is a risk of injury, to comply with the requirements of the Manual Handling Operations Regulations 1992.

The organisation works to a “minimal lifting” policy. All manual handling tasks undertaken by staff will be assessed by a competent person. This will be the site manager with support from the BPIF HS&E Adviser and will include the key members of staff who undertake the tasks identified. Where it is not possible to avoid manual handling operations, a formal risk assessment of the operation will be made taking into account the task, the load, the working environment and the capability of the individual concerned.

An action plan to reduce the risk and a safe system of work for the task must be written and followed by all staff. The assessment will be carried out by the site manager with support from the BPIF HS&E Adviser.

The assessment will be reviewed if there is any reason to suspect that it is no longer valid. Members of staff who have been identified to be required to undertake manual handling tasks will receive suitable inanimate load, moving and handling training.

This will be arranged by the site manager with the BPIF HS&E Adviser.

All possible steps will be taken to reduce the risk of injury to the lowest level, so far as is reasonably practicable. Trolleys and other lifting equipment is available for staff to use.

Employees are required to use lifting equipment provided to them by their employer, in accordance with their training and information provided to them by the organisation.

Staff experiencing musculoskeletal discomfort / problems must report these symptoms immediately to the site Manager, so that the appropriate advice and remedial action can be undertaken.

Monitoring

Each Site Manager will continuously monitor compliance with the policy as part of their management role. The site managers will undertake monthly safety inspections at the site they are responsible for and report back on significant issues that cannot be addressed locally to the business Directors. Assurance will be obtained by one of the BPIF HS&E Advisers to ensure that this process is being followed.

Music in the Workplace

Under the Performing Right Society (PRS) the organisation is required to purchase a PRS license at each site that 'plays' music. The source of music can be through either the employers or employees radios within the workplace, tapes or CD players in the reception areas or in the factory and music played 'on hold' on the telephone system.

The cost of a PRS Music License for the workplace is calculated by taking into account three variable factors. The information that will be required to calculate the cost of a license is as follows:
The number of days in the year that the music is played in the workplace.

The number of half-hour units per day music is played in the workplace.

The number of employees in the workplace to whom the music is audible.

The Management team within the organisation has deliberated over this subject and has decided not to purchase such license from the Performing Rights Society for each of the Organisation's sites.

Therefore, playing music within the workplace will not be permitted, nor are staff permitted to use their own personal stereos, cd or i-pod systems (in whatever form), as this carries other health and safety implications within the workplace.

However, if staff at one of the organisation's sites would like to subscribe to the Performing Rights Society for a music license, then they must discuss this with their site Manager and the Senior Management team. If permitted, the following criteria must be applied.

The individuals must obtain a license prior to playing music in the workplace.

The license must be clearly displayed in the workplace.

The volume level must be kept at a reasonable level so not to increase individual's personal noise exposure levels.

The Copyright, Designs and patents Act 1988 states that if you use copyright music in public, you must first obtain the permission of every writer or composer of the music you intend to play. PRS represents these copyright owners and so a PRS license gives you the legal permission to play just about any copyright music.

Noise

The organisation recognises its responsibility under The Control of Noise at Work Regulations 2005. Noise will be measured by a competent person and reduced as far as is reasonably practicable.

Noisy areas will be marked appropriately and staff working in those areas informed of the dangers, and issued with and trained in the use of appropriate hearing protection devices.

Where noise levels average 85dB(A) or above over an 8 hour working day or equivalent, the wearing of hearing protection and regular audiometry tests will be mandatory. These areas will be identified by mandatory requirement signage. In areas where noise levels average 80 dB (A) and above, but lower than 85dB (A), the organisation will provide suitable hearing protection to those who wish to wear it.

However, under the business duty of care, those persons exposed to these levels of noise will be 'advised' to wear the hearing protection available.

Before new machinery is purchased, suppliers are required to submit data on what noise level it will emit under normal use. The actual noise level will be checked upon installation.

Site Managers are responsible for ensuring that employees comply with all mandatory requirements.

Personal Protective Equipment (PPE)

Personal Protective Equipment (PPE) will be issued to employees where the risk assessment identifies its need. PPE identified will be correctly chosen to meet the required characteristics of the task and the person who will be wearing the item, so as to provide the wearer with maximum protection.

Employees who have been identified to wear the PPE, must ensure they wear / use and maintain such equipment in accordance with their training and education provided by their site managers.

Employees must immediately report its loss or significant wear to their supervisor or line manager.

Safety Rules

Employees are required to abide by the safety rules issued in conjunction with this policy at all times. See Appendix.5

Smoking on Site

The organisation is aware of its statutory duty under the Public Health Act 2006, and supportive Smoke Free Premises Regulations 2007 and Smoke Free (Exemptions and Vehicles) Regulations 2007. All sites display the correct signage, 'No smoking.

It's against the law to smoke in these premises', in conjunction with the international symbol, in colour, at all points of entry to the premises.

Smoking is only permitted outside of the premises i.e. car parks (when safe to do so), and within the designated restricted area away from any building openings i.e. windows, doors and air vents etc. If in doubt, seek advice from the relevant site manager regarding local arrangements.

A metal bucket has been provided for discarded cigarette ends.

All company vehicles are a place of work and are therefore, a smoke free environment under current legislation. It is illegal to smoke in a company vehicle and all vehicles will display an appropriate 'No smoking' sign, with the international symbol, in colour. It is the responsibility of the site manager to ensure that their site of responsibility and the company vehicles that they have control over are equipped with the correct signage and that employees are fully compliant at all times.

Compliance will also be monitored by Directors and the BPIF HS&E Advisers during site visits.

Training

All new employees will be given appropriate safety induction training and the company safety rules will be explained. In addition, they will be properly trained to carry out the specific responsibilities of their own individual job. The programme of training for each new employee will be set down by that employee's site manager and be delivered by a manager or supervisor.

Induction training - will be carried out prior to a new employee commencing any work for the company, and whenever possible this will be conducted on the first day of employment.

The level of training and subjects covered will be determined by the nature of the appointment but will include as a minimum:

- Company health and safety policy – aims, objectives and responsibilities
- Fire drills and procedures
- Specific job related training (including COSHH, use of PPE, Manual Handling & Safe systems of work etc.)

Job specific training – will be carried out prior to an employee moving to a new area of work or being provided with new equipment.

In both cases follow up sessions will take place within 6 weeks to ensure that the previous training has been effective and put into practice so that any shortfalls can be identified and re-training take place.

Records will be kept of any information and training given and signed by the employee.

All health and safety training to all levels of staff will be documented. Records will be kept by the relevant site manager, where applicable, and copies of such training sent to the administrator at the Celloglas head office in Theale.

Vehicle Movements on Site

The organisation is aware that movement of vehicles such as reversing commercial vehicles and Forklift Trucks are a hazard to staff and other persons that may be working or present on site i.e. visitors, contractors etc.

Vehicle movements across the site have been risk assessed by the site manager assisted by the BPIF HS&E Adviser and implemented practicable control measures to reduce the risk of an incident.

Control measures identified to manage the risk at each site will be disseminated by the relevant site manager and monitored by line managers / supervisors.

Employees and visitors / contractors working in or visiting this type of environment will be required to wear a hi-visibility vest / coat at all times.

Reversing vehicles operating on the site will be assisted by a suitable member of staff, in line with the control measures identified through the formal risk assessments for that particular site.

Forklift trucks will only be driven by authorised and licensed drivers who are employees of the Celloglas group. Drivers are responsible for ensuring that the daily forklift pre-use checks are undertaken and recorded. Any faults found during the vehicle daily checks with regards to the machines ability to be operated safely or a fault found with any of its safety devices, must be reported to the site manager or their appointed deputy immediately.

The vehicle must be taken out of use and not used again until the fault has been rectified by a competent person.

Working at Height

The Working at Height Regulations 2005 applies to all work at height where there is a risk of fall liable to cause personal injury. The regulations place duties on the employers, the self employed and any person that controls the work of others (for example, the facilities managers site manager or the building's owners who may contract others to work at height i.e. roof work).

The organisation is aware of its statutory duty under this legislation and the hierarchy of control measures required mitigating the risk of a fall whilst working at heights. It will be the responsibility of the relevant site manager to ensure that the following hierarchy is followed during the assessment process, for work to be undertaken by employees and contractors working at height.

- All work at height is properly planned and organised.
- Those involved in work at height are competent.
- The risks from work at height are assessed and appropriate work equipment is selected and used.
- The risks from fragile surfaces are properly controlled.
- Equipment for working at height is properly inspected and maintained.

The choice of ladders or stepladders to perform a task should be determined by a risk assessment to identify if work at height can be avoided in the first place (e.g. the use of a long handled tool to perform the task from ground level), or the use of safer equipment is justified (e.g. something with a platform or guard rails). Ladders and stepladders should only be used for short duration and light work or where site conditions prevent the use of safer access equipment.

Site Managers with the advice of the BPIF HS&E Advisers will be responsible for obtaining this information from a 'contractor', if employed to undertake work upon the premises.

Safe working procedures / method statements shall be obtained from the contractor along with their risk assessments for how the work is to be conducted in a safe manner PRIOR to any work being undertaken on site.

The relevant site manager is responsible for providing a level of supervision to ensure full compliance against the contractors risk assessments / safe systems of work etc.

A contractor will be asked to stop work and possibly leave the site, if the responsible person has concerns over unsafe working practices. This would be brought to the attention of Celloglas Directors and the BPIF HS&E Advisers.

Appendix 1

HOUSEKEEPING**YES****NO**

Are all walkways and gangways clear and unobstructed?		
Have all spilled materials been cleaned up immediately?		
Have the waste in bins been cleared and taken away in the past 24 hours?		
Are all plate and formers stored in the correct way and place?		
Have all personal items been removed from the premises?		
Is there any material or machinery lying around which is no longer required and needs removing from the premises?		

Appendix 1

CHEMICALS	YES	NO
Are all chemicals used internally being stored in the proper place?		
Are lids and screw tops being replaced on all chemical containers?		
Are all chemical containers labelled to show their content?		
Are there any new chemicals in use that have not been COSHH assessed for risk prior to being put into use?		
Are large drums of chemicals stored externally being stored correctly?		

Appendix 1

FIRE	YES	NO
Do all new members of staff understand the emergency fire drill procedure?		
Are all final exit doors clear – inside and out and fire escape routes clear?		
Are all self-closing smoke doors shut and not wedged open?		
Are all fire extinguishers easily visible and accessible?		
Are all solvent-soaked rags being placed in lidded containers?		
Are all highly flammable materials being stored in the fire-resistant cabinet?		

Appendix 1

FIRE	YES	NO
Are there any signs of smoking in unauthorised places?		
Is there any combustible material near a hot surface?		
Are alarm tests etc being recorded?		
Are new and old gas cylinders being put in the cage and is it locked?		
Have all personal items been removed from the premises?		
If portable heaters are in use are they kept well away from any combustible materials?		

Appendix 1

EQUIPMENT	YES	NO
Are all fixed machine guards in place and bolted on?		
Are all electrically interlocked guards working properly, i.e. - is the power 'cut off when they are lifted?		
Are the operators of dangerous machines (guillotines, platens) checking their guards each day before they start work?		
Is anyone operating a machine for which they have not been properly trained?		
Is all power being disconnected before machines are cleaned or adjusted internally?		
Are any ladders or steps in good repair?		

Appendix 1

EQUIPMENT	YES	NO
Has all portable equipment been 'portable appliance tested'?		
Are oil leaks being restricted to the underside of machines and spillages being cleaned up immediately?		
Is dangerous equipment (e.g. circular saw) locked off to prevent use by unauthorised staff?		
Are pump trucks being left in areas where they could cause slips and trips?		

Appendix 1

ELECTRICITY

YES

NO

Are all cables and joints in apparent good order?		
Is there any sign of water coming in contact with electrical supply?		
Is there any unauthorised electrical apparatus around - kettles, fires etc.?		
Are there any signs of electrical socket overloading?		
Are any electrical power supply cables running across passageways or areas where they could be damaged?		
Do all permanently positioned machines have a permanent electricity supply fixed in position?		

Appendix 1

PERSONNEL	YES	NO
Is anyone wearing potentially dangerous clothing or footwear?		
Are correct lifting techniques being used?		
Is protective clothing and PPE being used properly?		
Is the protective clothing in serviceable condition?		
Are accidents being recorded in the book and investigated properly to prevent reoccurrence?		

Appendix 1

VENTILATION

YES**NO**

Are all extract and input fans working?		
Is there any unusual build-up of smell or temperature?		

YARD

YES**NO**

Are the drivers of lift trucks and company vehicles all properly trained?		
Is the speed of the trucks excessive?		
Is there any sign of damage to buildings or equipment caused by trucks?		
Are keys being left in trucks when not in use?		
Are vehicles and pedestrians being adequately segregated?		

Appendix 1

OFFICES**YES****NO**

Are the position, layout and keyboard position of VDUs suitable?		
Are all cross-floor electric cables protected?		
Are all electrical cables and joints sound?		
Are there signs of multi-socket electrical supply point overload?		
Are lighting levels appropriate?		

Appendix 1

ENVIRONMENTAL**YES****NO**

Are solvents and prepress chemistry being disposed of as hazardous waste via a licensed contractor?		
Is anyone allowing hazardous chemicals to run into drains?		
Are spent wash-up solvents safely stored prior to disposal?		
Are precautions in place to control spillage of chemistry?		
Is all waste securely stored to prevent it becoming a nuisance?		

Appendix 1

OTHER ISSUES

SIGNED:

POSITION:

Appendix 2

MACHINE GUARDING CHECKLIST
MACHINE REF: _____

Checks required	Number of (Sketch/detail location on reverse)	Checks needed	Frequency
Emergency stops		Operation, stay down until released	Weekly
Interlocked guards		Operation	Weekly
Trip nip guards		Operation	Weekly
Fixed guards		In place, secure, undamaged	Weekly
Working area	N/A	Clear and tidy	Weekly
Electric cables		Damage, security of fittings	Monthly

Record of checks conducted.

NB: If any check fails, alert your supervisor immediately.

Appendix 2

MONTH:

Date	Check Type	Initials	Fault	Date (reported to Supervisor)	Date (repair carried out)
	Weekly				
	Weekly				
	Weekly				
	Monthly				

Any other comments:

Supervisors check

Appendix 2

MONTH:

Date	Check Type	Initials	Fault	Date (reported to Supervisor)	Date (repair carried out)
	Weekly				
	Weekly				
	Weekly				
	Monthly				

Any other comments:

Supervisors check

Appendix 2

MACHINE GUARDING CHECKLIST

MACHINE REF: _____

FIXED GUARDS

1	
2	
3	
4	
5	

6	
7	
8	
9	
10	

INTERLOCKED GUARDS

1	
2	
3	
4	
5	

6	
7	
8	
9	
10	

INTERACTIVE GUARDS – LIGHT CURTAINS, TRIP GUARDS, PRESSURE SENSITIVE MATS, ETC

1	
2	
3	
4	
5	

6	
7	
8	
9	
10	

Appendix 3

Checks to be carried out on guillotines with photoelectric safety systems daily, at the change of any shift and after knife changing.

Should the guillotine fail any of the above tests it should be taken out of use and made in operable.

A warning notice should be attached to the machine and the defects reported to the production supervisor/manager. It should not be used again until the fault has been investigated and repairs carried out.

Appendix 4 - Report a Hazard

Report a Hazard – Improve Safety for Everyone

This form, for reporting Health, Safety, Security and Environmental issues, is designed to ensure that once actual or potential hazards have been identified, the appropriate risk assessments can be undertaken / reviewed and suitable control measures put in place to eliminate the hazard or significantly reduce the risk of injury or ill-health for your fellow employees. The person responsible for raising the issue will also be informed of the actions taken; however, you may report a hazard without revealing your identity. Once completed the form should be passed to the site Manager.

ISSUE (to be completed by the person who has identified the issue)

Date:	Location:	Type of Issue:
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Description of issue – (including location, machinery etc):
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Name: (OPTIONAL)	Signature: (OPTIONAL)	Date:
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Appendix 4

ACTION TAKEN BY SITE MANAGER

Hazard verified: YES / NO	Date informed of issue:
---------------------------	-------------------------

Remedial action:

Name of Manager or person responsible for taking action:	Estimated date of implementation:
--	-----------------------------------

I have checked completion of the above issue & confirm that it has been eliminated, and the person who identified the issue has been informed that it has been resolved.
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Signature:	Date:
------------	-------

Appendix 5

PROJECT

From: Organisation:	
Address:	
Telephone:	
Fax:	
Reference:	

To: Organisation Name:	
Address:	
Fax:	
Reference:	

Appendix 5

Completed by:	
Position:	
Date:	
Signature:	

Please answer the following questions and supply relevant information as requested, providing details and documentation separately.

If more than five people are employed, provide a copy of your organisation's safety policy, as required by s.2 (3) of the Health and Safety at Work etc. Act, 1974 . Copy of policy enclosed:	Yes / No
Provide details of your organisation's health and safety management procedures, which will ensure the health and safety of your own workforce and others who could be affected by your activities on this project. Details enclosed:	Yes / No
Supply examples of risk assessments prepared in accordance with the Management of Health and Safety at Work Regulations 1999 (S1 1992/2051) . Examples enclosed:	Yes / No

Appendix 5

WHO IN YOUR ORGANISATION HAS DAY-TO-DAY RESPONSIBILITY FOR THE MANAGEMENT OF HEALTH AND SAFETY?

Name:	
Position:	
Telephone:	
Address:	
Fax:	

Appendix 5

WHO WILL BE RESPONSIBLE FOR SITE HEALTH AND SAFETY ON THIS PROJECT?

Name:	
Position:	
Telephone:	
Address:	
Fax:	

Provide details of the health and safety training that will be provided for your employees and others to ensure they are competent to carry out their designated responsibilities whilst employed on this contract.	Yes / No
What measures would you adopt to ensure the competence of contractors to whom you propose to award work on this project? Details enclosed:	Yes / No
Have any formal notices been issued or legal proceedings been taken against your organisation by the Health and Safety Executive in the last 3 years?	Yes / No

Appendix 6

Procedure in the event of finding a fire

1. SOUND THE ALARM
2. Attack with firefighting equipment if **NO PERSONAL DANGER** is involved; circumstances must dictate whether priority is to attack the fire or to evacuate immediately. If you are on your own and if there is **NO PERSONAL DANGER** involved attempt to extinguish fire, shouting 'fire' to draw attention of fire trained personnel. Should your attempt to extinguish the fire safely be in any doubt **LEAVE BY NEAREST EXIT** closing doors on your exit. Alarms are situated at all exits and are clearly marked. In all circumstances when fire trained personnel arrive on the scene leave by nearest exit.
3. Go to the Assembly point.
4. Telephone the Fire Brigade by calling 999
5. If our fire personnel have been unable to locate the fire give the location to them at the Assembly point. They will liaise with the Fire Brigade.
6. A roll call will be held at the Assembly point location. Note: this varies from site to site, therefore, check your local site information.

Procedure on Hearing the Alarm

1. All persons having no special fire duties should leave the building quickly and calmly by the nearest escape route **AFTER** they have turned off the power (hit the emergency stop button) to any machines they are operating.
2. Do not collect any personal belongings, **LEAVE** the building.
3. Close all doors on exit.
4. Go quickly to the Assembly point for roll call.

After leaving the building under **NO** circumstances should you return into the building until the Fire Brigade Officer informs you that it is safe to do so.

In all instances you must **NOT** leave the assembly point until instructed to do so by the Fire Brigade's Incident Controlling Officer.

If any of the above is not clear or requires further explanation, see your Supervisor / Manager immediately.