



PHOENIX FOODS LIMITED

HEALTH AND SAFETY POLICY

PART FOUR

HEALTH AND SAFETY ARRANGEMENTS

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1. ACCIDENT REPORTING AND RECORDING

An accident is:-

“Any unplanned, unexpected, random event which may cause loss, damage or injury”

It is the duty of Company employees to report all accidents, injuries, dangerous occurrences and near misses. The definition used includes any near misses or incidents which have occurred i.e. where an accident occurred but for whatever reason no injury was associated with it.

The accident reporting procedure includes accidents involving staff, contractors and visitors on Company property, as well as occasions when staff are carrying out Company duties during work time off site. All accidents and incidents no matter how trivial should be investigated with the main focus on how a similar occurrence which could result in an injury can be prevented.

Reporting and Recording

- All accidents and injuries occurring on Company premises, involving employees, visitors and contractors' staff are to be entered in the appropriate Accident Book (Form B1510).
- The accident book (forms) is located in the first aid room – in the pigeon hole on the wall
- As well as logging the accident in the book the accident must be reported by the injured party, or other nominated employee in their absence to the Engineering manager who will ensure the accident report form has been completed fully.
- The Engineering Manager or nominated H&S adviser will investigate the accident and record their findings on an accident investigation form.
- Any major injuries or accidents where a member of staff has taken over 7 days off work must be reported to the Engineering Manager as soon as possible as they will ensure the RIDDOR reporting is completed (see below).

Reporting of Injuries Diseases and Dangerous Occurrences Regulations - RIDDOR Reporting

These regulations require employers to report certain accidents and injuries to the Incident Contact Centre (ICC). The ICC must be contacted by telephone if there is a workplace fatality or major injury, but all other incidents must be reported by the on line reporting system via www.hse.gov.uk/riddor.

The Engineering Manager is the “responsible person” and will report any reportable injuries, a deputy will be appointed when he is unavailable.

RIDDOR requires the reporting of individual specific incidents which have occurred as a result of a work activity and may include non consensual violence.

When deciding if the accident that led to the death or injury is work-related, the key issues to consider are whether the accident was related to:

- the way in which the work was carried out;
- any machinery, plant, substances or equipment used for work; and
- the condition of the site or premises where the accident happened.

If any of the above factors were related to the cause of the accident, then it is likely that a reportable injury will need to be reported to the enforcing authority. If none of the above factors are satisfied, it is likely that you will not be required to send a report.

RIDDOR Requirements as from 1st October 2013

The main requirements of reporting include:

1. Fatalities
2. Specified Injuries
3. Workplace accidents which involve over 7 days off work (or away from normal activities)
4. Dangerous Occurrences (certain specified high risk near misses)
5. Diagnosed Industrial Diseases
6. Accident Related Deaths – within a year of an accident

1.1. Fatalities -

All deaths to workers and non-workers, with the exception of suicides, must be reported if they arise from a work-related accident, including an act of physical violence to a worker.

- These must be reported immediately to the Engineering Manager or nominated H&S advisor who will bring the matter immediately to the attention of the Managing Director.
- Fatalities should also be notified to the police immediately.
- The Engineering manager or nominated H&S adviser will then report this **immediately by the quickest practicable means** (telephone, or online) to the Incident Contact Centre 0845 300 9923. www.hse.gov.uk/riddor.

1.2. Specified Injuries

- There are a small number of named serious injuries which if involve an employee or worker on your site will be reportable to the Incident Contact Centre.
- These must be reported immediately by the quickest practicable means (telephone, or online) to the Incident Contact Centre 0845 300 9923. www.hse.gov.uk/riddor.
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Example specified injuries

- a fracture, other than to fingers, thumbs and toes;■■
- amputation of an arm, hand, finger, thumb, leg, foot or toe;■■
- permanent loss of sight or reduction of sight;■■
- crush injuries leading to internal organ damage;■■
- serious burns (covering more than 10% of the body, or damaging the eyes, respiratory system or other vital organs);
- scalpings (separation of skin from the head) which require hospital treatment;■■
- unconsciousness caused by head injury or asphyxia; ■■
- any other injury arising from working in an enclosed space, which leads to hypothermia, heat-induced illness or requires resuscitation or admittance to hospital for more than 24 hours.

1.3 Workplace accidents which involve over 7 days off work

These involve any accident involving a member of staff or a contractor which results in absence from work or inability to perform normal duties for seven days or more. If an individual continues to work following the accident but is subsequently absent for seven days or more due to the accident, it is still classified as an over seven day injury. The seven days excludes the day of the accident, so if an accident occurs on a Wednesday, it would become reportable if the injured party was not fit for work on the Thursday of the following week.

If a person is incapacitated for work for more than seven days, or not able to carry out their full normal duties for over seven days, this must be reported by the Engineering Manager, who will then complete the F2508 form online via www.hse.gov.uk/riddor within 15 days of the accident occurring.

1.4. Dangerous Occurrences

Dangerous occurrences are certain, specified near-miss events. Not all such events require reporting. If any of these incidents occurs the online reporting system must be completed as soon as practicable.

There are 27 categories of dangerous occurrences that are relevant to most workplaces. For example:

- the collapse, overturning or failure of load-bearing parts of lifts and lifting equipment;
- plant or equipment coming into contact with overhead power lines;
- the accidental release of any substance which could cause injury to any person

Full list of Dangerous Occurrences

Lifting equipment

1. The collapse, overturning or failure of any load-bearing part of any lifting equipment, other than an accessory for lifting.

Pressure systems

2. The failure of any closed vessel or of any associated pipework (other than a pipeline) forming part of a pressure system as defined by regulation 2(1) of the Pressure Systems Safety Regulations 2000(1), where that failure could cause the death of any person.

Overhead electric lines

3. Any plant or equipment unintentionally coming into (a) contact with an uninsulated overhead electric line in which the voltage exceeds 200 volts; or (b) close proximity with such an electric line, such that it causes an electrical discharge.

Electrical incidents causing explosion or fire

4. Any explosion or fire caused by an electrical short circuit or overload (including those resulting from accidental damage to the electrical plant) which either results in the stoppage of the plant involved for more than 24 hours; or causes a significant risk of death.

Explosives

5. Any unintentional fire, explosion or ignition at a site where the manufacture or storage of explosives requires a licence or registration, as the case may be, under regulation 9, 10 or 11 of the Manufacture and Storage of Explosives Regulations 2005; or

6. The misfire of explosives (other than at a mine or quarry, inside a well or involving a weapon) except where a fail-safe device or safe system of work prevented any person being endangered as a result of the misfire.

7. Any explosion, discharge or intentional fire or ignition which causes any injury to a person requiring first-aid or medical treatment, other than at a mine or quarry.

8. The projection of material beyond the boundary of the site on which the explosives are being used, or beyond the danger zone of the site, which caused or might have caused injury, except at a quarry.

9. The failure of shots to cause the intended extent of collapse or direction of fall of a structure in any demolition operation.

Biological agents

10. Any accident or incident which results or could have resulted in the release or escape of a biological agent likely to cause severe human infection or illness.

Radiation generators and radiography

11 The malfunction of a radiation generator or its ancillary equipment used in fixed or mobile industrial radiography, the irradiation of food or the processing of products by irradiation, which causes it to fail to de-energise at the end of the intended exposure period; or (b)equipment used in fixed or mobile industrial radiography or gamma irradiation, which causes a radioactive source to fail to return to its safe position by the normal means at the end of the intended exposure period.

Breathing apparatus

12. The malfunction of breathing apparatus where the malfunction causes a significant risk of personal injury to the user;

Diving operations

13. The failure, damaging or endangering of any life support equipment, including control panels, hoses and breathing apparatus; or the dive platform, or any failure of the dive platform to remain on station, which causes a significant risk of personal injury to a diver.

14. The failure or endangering of any lifting equipment associated with a diving operation.

15. The trapping of a diver.

16. Any explosion in the vicinity of a diver.

17. Any uncontrolled ascent or any omitted decompression which causes a significant risk of personal injury to a diver.

Collapse of scaffolding

18. The complete or partial collapse (including falling, buckling or overturning) of—

(a) a substantial part of any scaffold more than 5 metres in height;

(b) any supporting part of any slung or suspended scaffold which causes a working platform to fall (whether or not in use); or (c) any part of any scaffold in circumstances such that there would be a significant risk of drowning to a person falling from the scaffold.

Train collisions

19. The collision of a train with any other train or vehicle, other than a collision reportable under Part 5 of this Schedule, which could have caused the death, or specified injury, of any person.

Wells

20. In relation to a well (other than a well sunk for the purpose of the abstraction of water)

(a) a blow-out (which includes any uncontrolled flow of well-fluids from a well);

(b) the coming into operation of a blow-out prevention or diversion system to control flow of well-fluids where normal control procedures fail;

(c) the detection of hydrogen sulphide at a well or in samples of well-fluids where the responsible person did not anticipate its presence in the reservoir drawn on by the well;

- (d)the taking of precautionary measures additional to any contained in the original drilling programme where a planned minimum separation distance between adjacent wells was not maintained; or
- (e)the mechanical failure of any part of a well whose purpose is to prevent or limit the effect of the unintentional release of fluids from a well or a reservoir being drawn on by a well, or whose failure would cause or contribute to such a release.

Pipelines or pipeline works

21. In relation to a pipeline or pipeline works (a)any damage to, accidental or uncontrolled release from or inrush of anything into a pipeline;

(b)the failure of any pipeline isolation device, associated equipment or system; or

(c)the failure of equipment involved with pipeline works,

which could cause personal injury to any person, or which results in the pipeline being shut down for more than 24 hours.

22. The unintentional change in position of a pipeline, or in the subsoil or seabed in the vicinity, which requires immediate attention to safeguard the pipeline's integrity or safety.

1.5. Diseases

Certain industrial related diseases must be reported but only if they are associated or linked to the work that the employee completes. After notification via a doctor's medical certificate, the Company has to report these issues forthwith (ASAP) via the online form F2508A. This online form will normally be completed by the Engineering Manager or nominated H&S adviser at www.hse.gov.uk/riddor.

Example industrial reportable diseases

- carpal tunnel syndrome;
- severe cramp of the hand or forearm;
- occupational dermatitis;
- hand-arm vibration syndrome;
- occupational asthma;
- tendonitis or tenosynovitis of the hand or forearm;
- any occupational cancer;
- any disease attributed to an occupational exposure to a biological agent

1.6. Other

If an employee dies within one year as a result of an accident which has been reported under RIDDOR, the employer must notify the enforcing authority via the online system as the death comes to his knowledge.

1.7 Incident Contact Centre Contact Details

The Manager, Incident Contact Centre, Caerphilly Business Park, Caerphilly, CF83 3GG
www.hse.gov.uk/riddor

Major injuries/ Fatalities only 0845 300 9923 8.30 am to 5 pm only

Emergency on call out of hours inspector for major accidents or disruption only
0151 922 9235

1.8 Exemptions to RIDDOR reporting requirements

In general, reports are not required (regulation 14) for deaths and injuries that result from:

- medical or dental treatment, or an examination carried out by, or under the supervision of, a doctor or registered dentist;
- the duties carried out by a member of the armed forces while on duty; or
- road traffic accidents, unless the accident involved:
- the loading or unloading of a vehicle; work alongside the road, e.g. construction or maintenance work; the escape of a substance being conveyed by the vehicle; or a train.

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1.9 Record keeping

- Records of any reportable injuries, diseases or dangerous occurrences will be kept, in a safe and secure place, for three years. The records must include:
 - The date and method by which the incident was reported
 - The date, time and place of the incident
 - The personal details of those who were involved
 - A short description of the nature of the event or disease.
 - A note of any injuries not reportable but where over 3 days absence has been recorded must also be maintained by the employer.

2. ACCIDENT INVESTIGATION GUIDANCE

What is an Accident?

All accidents and near misses must be reported on the appropriate form, this is not an option but a legal requirement. An accident is any random, unexpected, unplanned event which has the potential to cause damage, injury or loss. A near miss or incident is therefore an accident which does not result in injury but had the potential to do so. Dangerous Occurrences are high risk incidents which are reportable under RIDDOR (The Reporting of Injuries Diseases & Dangerous Occurrences Regulations 2013 as amended 2013)

Why Investigate?

The important aspect of any accident is to take steps in order to prevent it recurring. After any accident a short investigation should be carried out and recorded, this should show what caused the accident, as well as the action taken to prevent it happening again. It is essential that information is recorded as soon as possible after the event, identifying exactly what happened becomes more difficult as time progresses.

Thus the purpose of an accident investigation is to take action to prevent the enormous amount of foreseeable accidents. Accidents do not just happen, they are the result of a sequence of events which at any stage can be interrupted and thus the accident prevented.

Your job is to find out the facts as accurately as possible. People are often dazed and confused so your best chance of getting clear, unbiased information is to stay calm and patient yourself.

Investigation Procedure

When an accident is first reported to you, find out ...

1. The severity of injuries
2. The seriousness of the hazard (the item or event which caused the accident)
3. If there is any likelihood of it recurring

You must then decide whether a visit to the scene is required, delay may mean vital evidence is lost. The aim of the investigation is to record what happened and take the necessary preventative action.

You will need to include in your report:

1. Name of those involved - including injured party and witnesses
2. Details of work being performed and working conditions
3. Location of the accident
4. What happened - facts not opinions
5. The cause of the accident & the injuries sustained
6. If the person has taken any time off due to the accident
7. What action has been taken to prevent a similar occurrence

If you need further advice, the Engineering Manager should be contacted.

Remember, it is important that all details are recorded, even seemingly trivial ones, because your report will be the basis upon which legal advice may be taken. Only include statements of fact, not personal opinions.

Accident Investigation Checklist

The following questions are designed to assist you during an investigation, they are by no means exhaustive but point out a few of the factors which will need to be considered, especially when identifying remedial action to prevent further occurrences.

Employee: Were they ...	Equipment: Was the equipment ...	Environment: Was the environment ...
<ul style="list-style-type: none">• Trained• Competent• Supervised• Wearing personal protective equipment• Wearing appropriate clothing• Following the correct protocol / procedure• Authorised	<ul style="list-style-type: none">• Defective• Suitable• Being used in the correct way• Adequately guarded• Maintained	<ul style="list-style-type: none">• Well lit• Free from obstructions• Well ventilated• Clean• Dry/wet

3. ALCOHOL / DRUGS

Alcohol or drug abuse by employees and contractors (including supervisory and management staff) can adversely affect the safety and health of themselves or others on our sites. Therefore, it is the policy of this Company that any person known to be, or strongly suspected of being, affected by alcohol or drugs must be referred to the appropriate manager who must arrange for the person to be removed from site.

It must be noted that symptoms suggesting that a person is under the influence of drugs or alcohol may be created by other conditions, e.g. heat exhaustion, hypothermia, diabetes, etc., also the person may be affected by legitimate medication prescribed by a doctor. These conditions, while still requiring the person to be removed for safety reasons from their work, will obviously affect any disciplinary action that may be considered. Therefore, if there is any doubt as to the person's condition or cause of their condition medical advice should be sought immediately.

Prescription drugs can also affect or impair a person's ability to operate equipment. Any employees prescribed drugs as part of medical treatment should pass on details to their immediate manager. Further advice will then be sought as necessary.

Procedure to Follow in the Event of an Employee Having to Leave Work through Injury, Illness or Under the Influence of Alcohol/Drugs

To Hospital via Ambulance or Transport (Taxi etc)

- A First Aider must accompany the injured person to destination. If by ambulance a nominated person other than a First Aider can deputise.
- If the injured person is travelling by ambulance the accompanying representative must not ride in the ambulance but follow by company vehicle or taxi.
- If the injured person is travelling by taxi they are to sit in the rear seat along with the first aider.
- If the injured person is travelling by car, a driver will be required, as the first aider will be required to sit in the rear seat with the employee.
- The accompanying representative may stay with the injured person until such time as the nominated contact arrives. The representative may make travel arrangements for all parties for return journeys from hospital to home or work.
- The Manager/Supervisor must inform the injured persons nominated contact name.
- NOTE: Only relay details to which hospital the injured person is being taken to, no more.
- The Manager/Supervisor must inform Senior Management, as per incident reporting procedures.

To Home

- Prior to allowing an ill/injured person to go home the Manager / Supervisor must be satisfied that there is a person to care for the employee within a safe environment.
- The Manager/Supervisor must inform the ill/injured persons nominated contact name.
- If there is no carer, the ill/injured person is to be advised to stay at work where they can be monitored until such time as a contact can be made.
- A first Aider must accompany the ill/injured person to their destination.
- If the ill / injured person is travelling by taxi they are to sit in the rear seat along with the first aider.
- If the ill/injured person is travelling by company car, a driver will be required, as the first aider will be required to sit in the rear seat with the employee.

- If it is deemed that the ill/injured person is capable of travelling using their own vehicle their named contact is to be advised.
- The Manager/Supervisor must inform the site manager, as per incident reporting procedures.

Alcohol / Drugs

- If an employee is suspected to be under the influence of alcohol or drugs, they are not to be permitted to enter/stay on company premises.
- The Manager/Supervisor must not allow the employee to take possession of a motor vehicle or pedal cycle. But must offer the employee alternate transport to a safe environment, this may be collection by next of kin etc.
- The Manager/Supervisor must inform the employees nominated contact name of the situation.
- If the employee insists on taking possession of a motor vehicle the Manager/Supervisor is to advise them that they have a duty of care to inform the police of their intentions.
- The Manager/Supervisor is to again offer alternative transport.
- If this fails the police must be informed immediately.

4. ASBESTOS PROCEDURE

Phoenix Foods recognizes its duty to manage asbestos that is present within its own commercial premises where employees may work. The presence of asbestos-based material does not in itself constitute a danger. However, it is hazardous when disturbed or damaged and must be treated accordingly. Activities which give rise to airborne dust, e.g. breaking, sawing, cutting, drilling or machining asbestos products, are most likely to present risks.

The aim of this procedure is to prevent the exposure of employees, contractors and others to asbestos on site.

Employees and contractors are not expected to work with or be exposed to asbestos, steps will be taken to prevent and limit exposure.

Asbestos Registers & Plans

The company maintains a register of known asbestos for its building. The register lists the type and location of Asbestos Containing Materials (ACMs), and makes prioritised recommendations for action (e.g. removal or regular re-inspection). It also contains site plans, which have been annotated to show the location of ACMs, this links with the asbestos risk assessment. This must be checked prior to work being started to check that asbestos is not present or potentially going to be disturbed by the work to be carried out.

The register is kept by the engineering manager, it will be reviewed prior to any building work being completed either by contractor or employees. The register will be made available to contractors undertaking building maintenance and repair activities. The asbestos on site is managed via monthly inspections to check its condition.

The risks of asbestos have been considered during the general risk assessment of the site, where work may involve disturbing asbestos containing material these will be assessed individually, any non licensed work permitted will follow the standards laid down in the Asbestos Task Manual HSG210, current versions of work methods will be checked via the HSE web site prior to work commencing. Names of those employees or contractors involved in this work will be recorded, along with details of the work type and its duration.

A majority of work involving removal and disturbance of asbestos containing materials will be undertaken only by HSE licensed contractors, whose competence will be checked prior to their appointment. Removal of asbestos containing materials must be notified to the HSE in advance using form "FOD ASB 5", fourteen days notice must be given unless there is emergency justification.

All engineering employees have been trained and informed on the risks associated with asbestos exposure and the safe working methods required.

The register and risk assessment will be reviewed annually or more frequently if building work is carried out which is likely to disturb a known asbestos source.

The Asbestos Management Plan will be monitored on a regular basis as follows:

- by the Engineering Manager team as part of routine daily work.
- during routine inspections of the premises

Any employee spotting that any fabric of the building is damaged or that a known asbestos location is damaged they must report it immediately to their line manager in the first instance.

The Engineering Manager or person in control of the work is responsible for ensuring that contractors, consultants or employees have all the relevant information and are aware of requirements before every job is started.

Procedures for previously unidentified or damaged asbestos

It is the responsibility of all employees to report any suspect or damaged asbestos containing materials. The Engineering Manager should be consulted where the material has become damaged or where planned work may cause damage or disturbance to asbestos containing material.

When ACM's are identified or suspected as being present in locations where persons intend to work (e.g. to undertake repairs and maintenance) their activities must be conducted in such a manner as to avoid disturbance of these materials.

In the event of any material being discovered which is thought to be an ACM, this is reported to the relevant officer as soon as is practicable. The following information should be provided:

- The address of the property and if it is vacant or occupied;
- The exact location of the material and the form of the product, e.g. lagging, insulation board, ceiling tiles;
- The condition of the suspected material.

No work should commence until a material assessment is carried out to identify the type and condition of the suspected asbestos. If necessary a sample will be taken by an approved and competent surveyor and be analysed by an UKAS accredited laboratory. All resulting information shall be recorded in the asbestos register.

Any new location where ACM is found will be recorded in the asbestos register.

Respiratory Protective Equipment (RPE) will be made available to relevant employees as determined by the work activity undertaken.

Material assessments are to be carried out by an approved and competent surveyor. During the survey they will determine the condition of ACM's and decide the appropriate course of action by the development of a scope of works. In respect of damaged ACM's, if it meets the licensed contractor criteria an appropriately approved and registered contractor will manage this process through removal or other such appropriate means. The findings of the assessments must be recorded on the asbestos register. All associated parties and employees will have access to information from the register.

Procedures for the removal of asbestos

It is company policy that work on ACMs will only be undertaken by approved contractors, licensed by the HSE. Should any specialist advice be required it will be the responsibility of the Engineering Manager using accredited consultants. These consultants will, in addition, provide a laboratory analysis for samples and undertake independent air-tests on-site when required.

Any building alterations which may disturb asbestos will require the completion of a refurbishment/demolition asbestos survey.

Where minor maintenance is to be carried out in an area where there is a risk that ACMs might be disturbed, the supervisor has responsibility to ensure that a check of the asbestos register is made and that the work envisaged is carried out so as not to expose the person undertaking the work to any risk. A risk assessment covering the activity must be in place. Recommendations on procedure must be followed (e.g. appropriate PPE and RPE, use of type H vacuum cleaners, damping down, using hand tools).

Labelling of ACMs

The Company is labelling ACMs where they are known to exist, in accordance with the information held in the asbestos register. Some materials that have been shown not to contain asbestos will also be labelled.

The absence of any labels indicating asbestos is present is not conclusive proof that none exists and if there is any doubt about the type of material, a specialist analysis will be arranged by the Engineering Manager.

What to do in an emergency

If damaged or unexpected ACMs are encountered, employees, contractors and consultants are required to stop work immediately, secure the area to prevent further access, and seek the advice of the Engineering manager.

They will take action as appropriate and a list of anyone who has been exposed to asbestos, record what action has been taken, and notify the HSE.

In the event of an unplanned release of asbestos, the following steps will be taken to mitigate the effects of the event:

- Wherever practicable, the area shall be sealed, and access to the affected area will be restricted to those dealing with the emergency.
- Employees or Contractors entering the area will wear appropriate respiratory protective equipment and protective clothing.
- The area will be cleaned of dust and fibres in accordance with HSE guidance.
- Suspect material will be sampled and tested.
- Clothing and tools will be double-bagged and tagged pending the outcome of the test sample.
- Personnel exposed will shower to remove any fibres in hair and on the body.
- An air test of the area will be undertaken to ensure there are no airborne fibres present.
- A record of exposure will be kept by Engineering Manager.
- Medical surveillance will be offered to any employee who may have been exposed.

Information Sources

Control of Asbestos Regulations 2012
HSE EM1 What to do if you encounter asbestos
HSG210 Tasks manual for non licensed work
<http://www.hse.gov.uk/asbestos/regulations.htm>

5. CHEMICAL SAFETY

Control of Substances Hazardous To Health Regulations 2002 (as amended) COSHH

Most work areas in the factory and company will have at least a small number of chemicals in use, in the main these are substances used for cleaning, hygiene, maintenance and engineering work. Additionally some raw materials used in the production process are also classified as hazardous substances. All substances used at work are covered by the Control of Substances Hazardous to Health Regulations 2002. The regulations lay down a framework for controlling the use of any substance and not only liquids; gases, vapours and dust are also covered. A few specific items such as lead and asbestos have their own legislation but a majority of substances are covered by COSHH.

1. Every substance must be assessed. This means looking at the substance, where and how it is to be used and assessing the risks to employees and others who could be affected. The assessment will be in writing unless the risk is trivial or low.
2. For most substances, except those deemed low risk a material safety data sheet will be obtained from the manufacturer or supplier. Details from the data sheet will be used in the assessment process but in themselves they are not assessments as they only consider the substance and not issues which may increase the risk when it is used.
3. Once the assessment is completed steps must be taken to control the risk of injury or occupational ill health. There are many ways in which we can control the hazards of using substances, a few examples are: substitution, isolation, local exhaust ventilation, fume cupboards, good housekeeping, supervision, training, safety signs, secure storage and, as a last resort, Personal Protective Equipment (PPE) or Clothing.

The principles within the COSHH Regulations will only be successful if employees and others who could be affected are given basic information on the precautions they should take. This includes what to do, how to use the substance and, just as importantly, what not to do. Everyone should know what to do in the case of a spillage, the storage arrangements and what precautions they should take to protect themselves.

Substances used in significant quantities where the risks of exposure are significant will be assessed on the individual COSHH assessment form, see useful forms which form part of this policy. Substances used on a limited, short duration, ad hoc basis or those not classified will still be assessed but the record format will be in less detail.

5.1 GUIDANCE ON THE COMPLETION OF FULL CHEMICAL ASSESSMENTS

Remember, COSHH is an ongoing process and every new substance must be assessed before it is used in the workplace.

Having gathered a list of substances used in your work area, an assessment of the risks to health must be made. The substances where the risks are trivial do not have to be recorded. E.g. use of air freshener in an office.

Where a basic assessment is not required, a product data sheet for the substance must be held on site and available as it may need to be referred to in an emergency.

For a majority of substances used within the Company, a basic assessment will be suitable.

Copies of Safety Data Sheets for any food products classified as hazardous will be obtained by the technical department and an assessment completed to ensure the current controls implemented on site are adequate to control the risks. Local exhaust ventilation units are fitted throughout the site, an extraction booth is provided for the weighing out of specific ingredients and extensive cleaning arrangements in place to minimise dust in the atmosphere. Additionally dust monitoring is undertaken annually to check the controls measures designed to minimise dust in the atmosphere are effective.

COSHH assessments have been completed for general cleaning in products and substances used in the engineering and maintenance activities

Completion of a Basic COSHH Assessment Form

Product Details - Enter the product or substance name, this should include the name of the manufacturer e.g. Domestos bleach as opposed to just bleach.

Dept / Work area - Remember, if the substance is used in the same way in several areas, one assessment can be completed as long as the circumstances of use in both or more areas are taken into account.

Form – Remember, hazardous substances do not always come in a liquid form.

Chemical Classification - This information will be found on the product label and on the data sheets e.g. toxic. Bear in mind that a substance without any warning symbols could still be hazardous.

Substance Type - Circle the relevant section or add a brief description of the substance. e.g. cleaning agent

Use - Briefly detail how the substance is used and for what. Also consider how exposure could occur. e.g. splashes, spills.

Time Exposed - estimate exposure i.e. is it used all day everyday or just for 1 minute a week?

PPE - (Personal Protective Equipment) Is PPE currently used, is it suitable?

Who is at Risk? - Circle as appropriate and estimate the number of employees in your area who could be exposed through usage or because they work in the near vicinity.

Current Controls - In many cases several measures have already been taken to prevent accidents and injury in relation to hazardous substances. Circle those currently in place and briefly detail any others which you identify. On the basis of this information you will now need to decide whether the risks are adequately controlled or whether you believe further improvements are required. Such as:

Minor Modifications - e.g. provide suitable goggles

Major Modification - e.g. provide additional extraction system

Detail the improvements you feel are appropriate and contact a safety adviser if you feel you need further guidance on the remedial action required.

Review Date - This should be no longer than 2 years from the date of the assessment.

5.2 GUIDANCE FOR THE SAFE USE OF CHEMICALS

- Ensure only food grade substances are used in operational areas.
- Always ensure tops are replaced on bottles and containers after use to prevent spillage.
- Keep all flammable substances (including air freshener) away from heat sources and naked flames
- Never bring in substances from home or purchase them locally – all substances must be assessed before use. Where there are risks to staff product data sheets must be obtained from the supplier and a written assessment completed.
- If there is a risk of chemical splashes always wear goggles
- Wear non latex gloves where there is a risk of skin contact
- Ensure substances are stored securely
- Never mix incompatible chemicals – even every day bleach and cream cleaners e.g. Cif (Jif as was) can produce harmful chlorine gas if mixed.
- Always store chemicals in their original container. Where they have to be decanted the container should be marked with the product's name and any chemical classifications.
- Check which chemicals are in use on a regular basis, dispose of any no longer used
- Ensure you know what to do if the chemical spills, splashes onto your skin or into your eye.
- Good housekeeping in relation to stores will lead to improved standards throughout all working areas.
- Materials will be stored in closed containers in the upright position in locked or properly supervised and controlled storage areas.
- Highly Flammable liquids will be stored in segregated area, small volumes can be stored in lockable steel cabinets.

Solvents

Where it can be avoided do not use solvents e.g. cleaning agents, adhesives etc. If you have to use them make sure the area is well ventilated and controlled.

- Always read and understand the hazards associated with the solvents to be used including disposal and spillage.
- Keep evaporation of solvents to a minimum by keeping lids on containers, do not leave solvent soaked rags lying around and use sealed containers for waste product ensuring that the waste is disposed of correctly.
- Avoid skin contact - follow manufactures guidelines in the event of contact or spillage.
- Where recommended where the appropriate protective clothing.
- Do not use solvents as a washing aid for the skin.
- Use an after work cream to help replace natural skin oils that may have been removed by solvent use.
- Do not use naked flames near solvents.

5.3 LOCAL EXHAUST VENTILATION

Due to the nature of the processes undertaken which may create dust the factory area has local exhaust ventilation (LEV) fitted throughout to extract the dust. The extract points are designed to be as near to the point of source as possible, so that a majority of the dust is extracted before they reach the breathing zone of the worker. The design is a very important factor to ensure that exposure is controlled adequately.

It is also important to ensure that the contaminant is extracted away from the breathing zone of the worker and not through it. Capture hoods have a greater pressure to extract upwards and across, receptor hoods use the natural movement of air upwards and as such are not normally as strong.

Thorough Testing of LEV

The Control of Substances Hazardous to Health Regulations (COSHH) dictate that a thorough test & examination of LEV systems is carried out by a competent person at 14 month intervals or less. At Phoenix foods the thorough examinations are completed annually.

Lower level regular inspections by local engineers and users will be carried out at regular intervals. For example, operators should be trained to carry out daily visual checks, including checks of the current draw of the fan motor, which will indicate when filters are blocked. In addition as part of the company planned preventative maintenance programme the LEV systems are cleaned and maintained every six months and the duct and hood velocity checked to ensure the flow rate is acceptable to extract the dust sufficiently.

There are three main components of LEV thorough examinations

- Visual check
- Measurement of plant performance and assessment of control
- An assessment of the performance of the air cleaner or filter where air is re-circulated

The following will be measured during a thorough examination.

- Measurement of static pressure (in duct)
- Measurement of air velocity in duct
- Air velocity at face of enclosure or point of emission
- Visualisation i.e. smoke test or 'tell-tales' at the face of the inlet
- Power consumption

Thorough examination reports are kept on site by the Engineering Manager and any recommendations actioned.

6. COMMUNICATION AND CONSULTATION

At Phoenix Foods we recognise the value of effective methods of communication and consultation in achieving a positive health and safety culture in our business, to ensure not only that up to date information is available when required, but also that our employees are fully involved with our management of health and safety.

It is our policy to:

- Establish effective lines of communication both internally and externally as required.
- Involve and consult with workers on issues affecting their health and safety at work and to take account of their views.

Communication and consultation on site takes place through:

- Individual conversations between colleagues
- Team meetings
- Notice-boards
- Health and Safety committee meetings which meets every three months
- The liaison and support of the Safety representatives.
- Providing induction and other training
- Investigation of accidents
- Provision of a staff handbook and this H&S policy
- Completing workplace inspections

Additionally the following information is displayed on site:

- The 'Health and Safety Law - What You Should Know' poster
- Our current Certificate of Employers' Liability Insurance
- Our Health and Safety Statement of Intent
- Safety signage
- Details of first aiders

We will consult with workers when changes to processes, equipment, work methods etc. are introduced into the workplace that may affect their health and safety at work. Additionally we will inform employees of the arrangements for appointing a competent person.

7. CONTRACTORS MANAGEMENT AND AGENCY WORKERS

In the course of its normal activities the Company may use the services of contractors and individuals employed by employment agencies. The company cannot contractually delegate certain duties within the Management of Health and Safety at Work Regulations 1999; it remains an 'employer'.

For the purposes of the following policy, the term 'contractor' brings into scope agency workers.

Selection of Contractors

A majority of contractors will be selected by the Engineering Manager, but on occasions other managers and supervisors in the factory who are empowered and authorised to procure contractors will ensure:

- The contractor has the necessary skills, experience and qualifications to do the task or project required of them.
- The contractor fully describes the process for the selection of sub-contractors and that the competence criteria are met at all times.
- The contractor provides, when requested or required, the information in section 7.1 of this policy which may include a method statement supported by specific risk assessments prior to the commencement of work.
- The contractor's staff hold, when appropriate a 'safety passport' or have attended safety awareness training.

Assessment of Risks

The Engineering manager or supervisor in line management control of the contractor will:

- Agree with the contractor the scope of work, what the objective is, who will undertake it and the method of undertaking.
- Where necessary agree with the contractor who will undertake the risk assessments, the control measures established by the risk assessments and the procedures for safe working that will be applied while the work is in progress.
- Ensure that sub-contractors are part of the above assessment, review and communication process.
- Agree on the arrangements for reporting relevant accidents.

Managing the Contractor

Managers and supervisors will ensure that:

- All contractors' employees understand the factory rules for safe working as well as any hazards.

- Each new employee arriving to work at the factory site will receive appropriate induction, instruction and training which will make them aware of the hazards at the factory to be aware of and the emergency procedures.
- There is regular communication with contractors to ensure that all parties are aware of all times of hazards that may be arising and any change of plans, and that the contractors' health and safety performance is monitored.
- When health and safety requirements are identified as not being met the both the factory managers and/or supervisors and the contractor work together to investigate the shortfall in performance and resolve a solution.

Record Keeping

The managers and supervisors with line management responsibility for contractors will ensure that all risk assessments, method statements and any supporting documents prepared and provided to the factory.

Copies of the documents should be retained by the Engineering Manager in a manageable, accessible and auditable manner for ease of ongoing reference while the contractors are employed.

Selecting Agency Staff

The agency will be required to pre check to ensure workers are fit and able to work in a food environment. A basic induction giving details of hygiene and basic health and safety requirements will be provided to all new agency employees. As a minimum this will include signing arrangements, wearing of personal protective equipment, the fire emergency plan, first aid and accident reporting.

7.1 CONTRACTOR QUESTIONNAIRE

To be completed by all contractors prior to commencement to work on site.

Company Name:

Details of Company Activities:

Description of work to be undertaken:

Number of employees:

Company References: (Previous work undertaken)

Details of people who undertake the following responsibilities

- **Provision of competent Health & Safety advice**
- **Environmental issues**
- **Staff Training**

Please answer the following questions

Please tick which of the following hazards are applicable to the work being tendered for.

Work at height	Hazardous substances	Noise	Hand arm vibration	Use of highly flammables
Hazardous manual handling	Work with live electricity	Biological hazards	Hot work	Powered hand tools

1. Do you have a written H&S Policy – If yes please provide copy
2. Do you have general risk assessments covering the work to be undertaken? Please provide a sample.
3. Does the company belong to any professional or trade bodies? If “Yes” provide details
4. Will the work entail using and hazardous substances?
5. Do you have COSHH assessments and manufacturers safety data sheets for the chemicals to be used? IF “Yes” provide an example copy.
6. Please describe how you monitor the health and safety of your staff when they are working off site?
7. Please provide a copy of a method statement for the task to be completed
8. Do you anticipate using sub contractors for this job?
9. What safety training do you provide to your staff?
10. Do you have an Employers Liability insurance policy? If yes please attach copy.
11. How many injury accidents have your staff suffered in the last year?
12. Has your company been issued with any improvement or prohibition notices from the H&S enforcing authorities in the last 12 months? If “yes” please provide details and the action taken to deal with the issues raised.
13. Has your company been successfully prosecuted for any H&S offence in the last 12 months? If “yes” please provide details and the action taken to deal with the issues dealt with by the court case.
14. Are you CHAS accredited or accredited by any other contractor approval schemes?

7.2 CONTRACTORS - SITE RULES

- 1 These cover all premises, buildings and grounds within the boundaries of Phoenix Foods and will be issued to contractors prior to them coming on site.
- 2 **On Site Working**
 - i **Projects** - All contractors must report to the reception prior to commencement of any project.
 - ii **Service Contracts** - Any company awarded a regular maintenance service agreement which is for a scheduled routine visit, will be required to give at least three working days notice of arrival on site.
- 3 **Supervision** - All contacts or queries must be directed to your contract contact.
- 4 **Tools and Equipment** - The contractor shall provide any necessary tools, including step ladders and access equipment for use on the project. All electrical equipment used must be tested, inspected and in good working order.
- 5 **Materials** - The contractor shall provide all materials for the project.
- 6 **Unauthorised Access** - The contractor should be made aware of areas which are restricted, and that if entry is required this must be authorised by the engineering manager.
- 7 **Noise and Nuisance** - Noise and vibration must be kept to a minimum during the execution of all work.
- 8 **Fire** - Contractors must be made aware of procedures in the event of a fire.
- 9 **Smoking** – Contractors must not smoke whilst on the premises.
- 10 **Health and Safety** - The contractor's senior officer on site has the duty and responsibility to ensure that their staff follow all health and safety guidelines as laid down by Health & Safety legislation. Contractors should report all accidents / incidents involving their staff, and ensure that protective clothing and appliances have been tested for their safe use.
11. All contractors shall have insurance cover for General Third Party Risks.
12. No faulty equipment or tools shall be brought onto site. Evidence of current safety will be required for certain items such as portable and transportable electrical equipment and electrical tools, work at height equipment, pressure systems and any other items specified by the company at the time of work.
13. Personal Protective Equipment shall be worn where necessary and all such equipment shall be suitable, provide adequate protection, and be properly maintained.
14. All persons working on Company premises shall be properly trained and/or be under adequate supervision and competent to undertake their duties without causing danger to themselves or others who may be affected by their acts or omissions.

15. A safe system of work shall be agreed with your host/contact before any work commences. The agreed safe system of work shall not be changed without reference to the person with which it was agreed.

If the '*high risk*' activities are to be undertaken, a permit to work will apply. The following activities are to be considered as high risk.

Work in restricted areas
Entry to confined spaces
Electrical Works
Work at Heights
Servicing of site services
Hazardous machinery maintenance

Permits shall be correctly completed and issued before any work commences by the Engineering manager or nominated deputy.

16. All contractors and persons under their control shall:

Familiarise themselves with the work site and means of fire evacuation
Note the location of the nearest First Aid facilities and act upon audible alarms, notices and signs, and the instruction of local supervision in cases of emergency

The senior contractor shall be responsible for reporting to the incident officer that all persons within his or her control have safely evacuated the building or otherwise in cases of emergency.

17. Contractors and persons under their control shall comply with all relevant Health and Safety Law and all Company Health and Safety Rules.

18. **Variation to Work** - Any amendments to specifications or working procedures can only be given by the Engineering Manager or nominated company contact.

19 Signs and Notices - Contractors must abide by all relevant notices, health and safety warnings and hazard signs.

8. DISPLAY SCREEN EQUIPMENT (VDU)

Health & Safety (Display Screen Equipment) Regulations 1992

In the last twenty years manual typewriters have been replaced by computers. Along with the new technology have come new hazards which can, if not controlled, cause injuries to those using computer workstations. All of the hazards are identifiable and can be prevented from causing injury.

The Health & Safety (Display Screen) Regulations set legal standards for personnel who use computers for a significant part of their normal working day. These standards are also considered good practice whether a computer is used for half an hour a day or seven hours a day.

All workstations operated by “users” have been assessed and will be reviewed if there are any significant changes.

Where “users” work on DSE the following standards apply:

Chair - adjustable height, adjustable back rest, swivels e.g. a non static typists’ chair

Keyboard - separate from computer unit, adjustable height, clear keys and clean

Screen – able to tilt, swivel and has contrast and brightness controls

Desk - non glare surface, sufficient space to allow keyboard and other work to be completed

Environment - adequate ventilation, temperature, space and lighting

Eye sight tests – provided free of charge for “users”.

All personnel must be made aware of the hazards and what they can do to improve their workstation. Information regarding eye tests and further advice is available from the company administrator.

For further information refer to the staff handbook and DSE assessments.

DSE GUIDELINES

DSE “users” i.e. Someone who uses DSE habitually for a significant part of their working day. In the Company, “users” are considered to be those who meet all or most of the following criteria.

- Regular use for an hour or more a day continuously or more than 2 hours intermittently.
- The individual depends on the use of the display screen equipment to do their job.
- The individual needs significant training and / or particular skills in the use of the equipment in order to use it correctly.
- There is rapid transfer of information between user and screen.
- The performance of the system demands high levels of “user” attention and concentration.

Those people who use a terminal infrequently or for very short periods of time are not “users” and therefore do not come under the remit of the Health & Safety (Display Screen) Equipment Regulations.

Faults concerning the equipment, workstation or surrounding environment should be the subject of prompt remedial action.

Each DSE “user” should have an eyesight test either before using the equipment or as soon as possible after beginning DSE based duties.

Each terminal should have:

- a contrast and brightness control
- a screen which tilts and swivels
- a keyboard which is detachable

Also:

- Terminals should be tested routinely
- A workstation assessment must be carried out for every workstation used by a “user” and remedial action taken.
- Document holders and footrests should only be provided when the assessor, in conjunction with the “user”, identifies that these items could reduce the risk of injury.
- Bright surfaces on nearby furniture or equipment should be avoided.
- Adequate space around the workstation must be provided.
- Heating and ventilation should be kept at a suitable level.
- Lighting should be arranged to avoid harsh contrasts, reflection or glare. Any florescent tubes should be diffused or shielded.
- Terminals should be sited away from windows where possible with natural light coming at right angles.

DISPLAY SCREEN GUIDANCE FOR USERS

When using your Display Screen Equipment:

- Raise or lower your seat until your forearms are horizontal. Make sure your wrists are straight when your hands are on the keyboard.
- Sit right back in the chair so that the backrest can support you.
- Form a relaxed curve in your back and adjust your backrest to provide support when in this position.
- Use a footrest if your feet do not comfortably touch the floor.
- Remove any obstructions under the desk.
- Position your document holder if you have one near to the screen.
- Set your viewing distance to suit the screen character - no closer than 14 inches.
- Adjust your screen and document holder to suit your sitting position.
- Change your screen adjustments hourly to suit the differing lighting levels.

- Rest your arms and shoulders whenever your work routine allows.
- Clean your screen regularly as it will attract dust readily.
- The screen should be free from glare and reflection, if you can see your face in the screen it is in the wrong position.
- The keyboard can be tilted to improve accessibility, keep a clear space in front of the keyboard to support hands and forearms.
- Do not stay at your workstation in the same position all the time, stretch you arms and legs, look out of the window to relax your eyes.
- There is no reason why DSE cannot be used safely by any person who is pregnant.
- If you are using another persons' DSE, adjust it to suit yourself.
- Try taking a break from keyboard work on a regular basis - 5 minutes an hour or try doing something different to help reduce any discomfort.

All workstations operated by "users" will be assessed and reviewed if there are any significant changes.

9. DRIVING FOR WORK PURPOSES

All drivers must have a valid and up-to-date drivers licence available for inspection whenever driving on company business.

Driving under the influence of illegal drugs is totally unacceptable. It is a criminal offence and disciplinary action will be taken against any driver found to be in breach of this rule

Drivers are reminded that they must take account of any medication or alcohol consumption that reduces their capability to drive safely or breaches the permitted limit. Please note that insurances may be invalidated if the police identify this and, in addition, charges may be brought against individuals as appropriate.

Drivers should plan their journey and take breaks at appropriate intervals to reduce tiredness and fatigue.

Drivers must comply with the Highway Code and are advised to take a 15 minute break after every 2 hours of driving. Consideration should also be given to drinking a cup of tea or coffee.

As stated in the Highway Code, seat belts must be worn by drivers and passengers **at all times**. Failure to wear a seat restraint may lead to serious injury in the event of an accident; is an offence in itself; may invalidate insurance and would be considered

Vehicles should only be loaded up to the manufacturer's recommended weight. Loads must be secured and contained within the vehicle perimeter. Overloading vehicles can result in loss of vehicle control and injury to others. It is not only a prosecutable offence, but drivers not meeting these standards may be subject to disciplinary action.

DRIVING AND MOBILE PHONES

From 1st December 2003 it became a criminal offence to use a hand held phone, or 'similar device' when driving. All employees are subject to the legal requirements for the use of mobile telephones in motor vehicles. Phoenix Foods does not require that any driver make or receive telephone calls whilst driving.

Drivers must NOT use a mobile phone whilst driving unless a hands-free kit, and even then drivers should only make/take short phone calls. You should bring your vehicle to a halt to continue a conversation. Driving whilst using a hand held mobile phone is illegal and breach of this rule will be treated as a serious disciplinary offence.

Drivers should never drive while sending a text message or responding to an incoming text. It is both irresponsible and a danger to you, passengers and other drivers. Again, failure to adhere to this rule will be dealt with as a serious offence under the Company's disciplinary procedure.

SAFE DRIVING PRACTICE

Phoenix Foods has a responsibility for the safety of all employees including those who work off site such as representatives on the road. Some basic rules on car safety are listed below

Before you begin your journey

- Plan your route in advance but keep an atlas in the car.
- Don't drive whilst under the influence of drink or drugs.

- Carry out some basic checks on your car. E.g. tyres, lights, oil, water and fuel.
- Ensure you are familiar with the wheel changing instructions in the car's manual
- Inform someone of your destination and estimated time of arrival.
- Carry a means of communication i.e. mobile / car phone or at least change for a phone box.
- If you open a door and the internal light fails to work, check there are no intruders inside the car before you get in.
- Make sure you have your eye sight tested regularly and you are not suffering from any ill health condition which could impede your vision or ability to drive.

During the Journey

- Keep your doors locked, particularly when in heavy traffic, at traffic lights or junctions.
- Keep all valuables out of site / reach of an opportunist thief.
- Do not stop to pick up hitch-hikers.
- Avoid angry exchanges with other drivers.
- Ensure regular breaks if long journeys are undertaken.
- Do not use your mobile phone unless it is fitted with a hands free unit and it is safe to do so.

On Completion of the Journey

- Park in a well lit area if possible.
- Ensure all windows (including sunroof) and doors are locked.
- Ensure any valuables are stored out of sight e.g. locked in the boot / glove compartment.
- Let someone know that you have finished for the day.

A general risk assessment will be completed for all driving activities where there is a significant risk.

WHAT TO DO IN THE EVENT OF AN ACCIDENT

The following action **MUST** also be taken in the event of an accident: -

- As appropriate, use your hazard warning lights to warn other traffic of any hazard.
- If someone is injured, you **MUST** call for an ambulance and contact the police immediately.
- **DO NOT ACCEPT RESPONSIBILITY** and no comment should be made on the accident to anyone except the police.
- Exchange names, addresses and motor insurance details with all third party drivers involved in the accident. Take note of the vehicle registration number(s) and a description of the vehicle(s) involved.
- If any of the vehicles are or appear to be owned by a company, obtain the name and address of the company.
- If the third party did not stop or give their details, and in the event of theft of, or from the vehicle the police **MUST** be contacted.
- Take down names and addresses of any witnesses that weren't involved in the accident.
- Take measurements or use your own judgment to assess the position of the vehicles involved in the accident. Photographs should be taken whenever possible.
- Do not move the vehicle if you think it will cause further damage.

- If you are driving a privately owned vehicle, arrange for the removal of the vehicle by contacting your own accident recovery provider.
- Road traffic accidents involving animals **MUST** also be reported to the police.

Damage to council property or street furniture (e.g. lamp posts, islands, etc.), **MUST** be reported to the police and must be reported on an accident/incident report.

Information Sources

HSG 382 Driving at work
ROSPA Driving guides

10. ELECTRICITY - Electricity At Work Regulations 1989

Electricity is a known hazard, which has the potential to kill if not treated with respect. Electrical equipment from home should not be used in the workplace.

Phoenix Foods recognises its duties to safeguard its employees and others from the risk of electric shock or fire occurring due to a malfunction of the equipment or installation and risks that can arise when electricity is used with or near substances, e.g. ignition or explosion.

These requirements apply to all equipment and installations whether new, second hand, borrowed, leased or donated.

The Company will ensure that all electrical systems and appliances are installed, maintained and tested in accordance with the requirements of the Electricity at Work Regulations 1989 and the Health and Safety at Work Act 1974. This will be achieved by ensuring that:

- All work to the electricity supply system is undertaken by either a qualified employee or external contractors who meet the Company's requirements and are included on the Approved Contractors list
- The fixed installation system is checked and tested every 3 years in accordance with the Institution of Electrical Engineers 17th Edition, Wiring Regulations (BS 7671) Guidance Note 3.
- All existing, new and refurbished electrical equipment is safe and suitable and meets current approved British Standards (including equipment made in house)
- All electrical equipment is used in accordance with safe systems of work and Standard Operating Procedures, i.e.
 - there is an accessible and clearly identified switch near each fixed machine to cut off power or a clear Instruction in an emergency
 - for portable equipment, socket-outlets which are close by are used so that equipment can be easily disconnected in an emergency
 - light bulbs and other equipment which could easily be damaged in use are protected
- All electrical equipment that is in use is maintained in a safe condition. This will include checking, inspecting and testing as appropriate. High risk portable appliances will be tested annually (Portable Appliance Testing) but other low risk equipment will be subject to user checks or formal visual inspections or PAT tests at least every three years.
- Records of all PAT testing will be kept and equipment marked with its next PAT test date or formal visual inspection date.
- All work involving electricity is organised and managed to eliminate or reduce to a minimum the risk to those carrying it out and others that may be put at risk
- Work on live equipment or near any live conductor (other than those suitably insulated) is prohibited except when it is not possible to carry out the work dead. Guidance on the work procedure to be adopted is incorporated into this policy.
- Equipment wired into the mains supply is only connected or disconnected by a qualified employee or authorised contractor
- Arrangements are made to prevent unsafe equipment being used
- The use of extension leads and multiple adapters is restricted

Only Competent People will be permitted to carrying out the testing and/or repair of electrical systems.

It is recognised that many people will have acquired a basic competence in connecting plugs, selecting fuses and noting faults in plugs and cables, without

specific training which can be readily identified. This basic competence will be sufficient, in general, for such individuals to carry out the inspection of portable electrical equipment.

The Site trainer / Factory Manager / Engineering Manager will decide whether a particular individual is competent to carry out work with electrical equipment, on the basis of assessment of the task, the experience of the individual and the particular job.

10.1 Responsibilities

Engineering Manager / Nominated H & S Adviser

- Set up Safe Systems of Work
- Ensure Standard Operating Procedures and Safe Systems of Work are followed
- Maintain the list of Approved Contractors
- Ensure that the fixed installation system is inspected and maintained in accordance with legal requirements
- Keep records of fixed installation testing
- Ensure that portable appliances are tested in accordance with company policy and legal requirements.
- Keep the register of portable appliances, with the testing schedule for each, and the records of testing

Employees

Each employee who uses electrical equipment must:

- Ensure, to the best of her/his ability, that any electrical equipment s/he uses is undamaged and safe
- Use electrical equipment correctly and not overload the power supply
- Report any defective electrical equipment to their supervisor or member of the engineering team immediately and take it out of use
- Not attempt to repair, dismantle or otherwise interfere with electrical equipment unless competent and authorised.

10.2 CHECKING, INSPECTING AND TESTING OF ELECTRICAL EQUIPMENT

User Checks / Visual Checks

All electrical equipment that is in use must be maintained in a safe condition to prevent danger. ('In use' means equipment that is currently being used or is capable of being used.) A visual inspection is very important. All employees will carry out a basic visual check prior to using any portable electrical appliance and particular attention will be paid to equipment which is mobile and moved around during its day to day use. No formal record of these checks is required to be kept but any faults found must be reported and if the equipment is damaged it must be taken out of use immediately.

Not all equipment will need the same checks; the risk of damage that equipment and cables could be subjected to should be assessed.

Method of use	Type of checks
Equipment which is moved regularly	<ul style="list-style-type: none"> • Each time before use check appliance and cable and plug (especially if cables are dragged about).
Equipment that is moved infrequently	<ul style="list-style-type: none"> • Each time before plugging in check plug

but is regularly unplugged	<p>and the part of the cable leading into the plug.</p> <ul style="list-style-type: none"> Occasionally check appliance and visible length of cable
Equipment that is moved infrequently and is not regularly unplugged	<ul style="list-style-type: none"> Occasionally check appliance and visible length of cable. When unplugged check the plug and the part of the cable leading into the plug
Equipment that is hard-wired into the mains supply	<ul style="list-style-type: none"> Occasionally check appliance and visible length of cable.

Points to look for:

- The condition of the equipment, signs of damage, misuse and obvious defects
- Signs of overheating
- Loose wires
- The condition of the cable and armouring. Particular attention should be paid to any cuts, scuffing, crushing, signs of overheating, burns, chemical contamination, fraying, any visible inner wiring, signs of abrasion and stretching
- The condition of plugs and sockets including damage, looseness and contamination

Fault reporting

When using an electrical devices, if any of the following symptoms are experienced SWITCH OFF the current at once at the wall socket, remove plug and notify your immediate supervisor or a member of the engineering team.

- Machine acts differently to normal
- Machine runs intermittently
- Machine makes unusual noises
- Machine becomes hot
- Machine gives off acrid smoke
- Machine stops working

Formal Visual Inspections

This is an important component of a maintenance system since these inspections will enable most potential faults to be discovered. These inspections are more formal than user checks and are carried out at prescribed intervals.

The formal inspection should be carried out in a systematic way, preferably following a check list. The *User Check* should be carried out first. Additionally the following should be checked:

- The whole length of the lead that it is free from defect.
- That the correct fuse is fitted.
- That the cord grip is effective.

And if the plug top can be removed:

- That the cable terminations are correct and secured.
- That there is no sign of internal damage, overheating or ingress of liquid or foreign matter.

The results of the formal inspection must be recorded.

Combined Inspection and Electrical Testing (PAT Testing)

Combined inspection and testing of electrical equipment will be undertaken in line with the Health and Safety Executives guidance document HSG107. High risk electrical appliances which are prone to damage or used in the factor area will be tested annually

Testing should reveal faults that cannot be detected by user checks and inspections.

The essential tests are:

- earth bond (class 1 equipment only);
- Insulation resistance.

The results of testing must be recorded.

For equipment rated up to 240 volts and plugged into the mains supply a portable appliance tester (PAT) is needed to carry out these tests.

For equipment hard-wired into the mains supply and/or rated above 240 volts more specialised equipment is required.

A regime of PAT testing will be in place based on an assessment of the electrical risks associated with each item of equipment and its use.

10.3 WORK ON OR NEAR LIVE EQUIPMENT

Unless there is no risk, work on live equipment or near any live conductor (other than those suitably insulated) is **prohibited** unless **all** the following criteria are met:

- It is unreasonable in all circumstances for the equipment or conductor to be dead

AND

- It is reasonable in all circumstances for the person to be at work on or near the equipment or conductor while it is live

AND

- Suitable precautions (including where necessary the provision of suitable protective equipment) are taken to prevent injury

Circumstances where it may be necessary to work on live equipment or near live conductors include:

- Commissioning or adjusting equipment
- Fault finding

If live working is carried out a **safe system of work** is required based on a risk assessment.

This includes:

- Only allowing the minimum number of people to work on the equipment
- Having permit to work procedures
- Having the equipment live for the minimum length of time
- Using the correct tools
- Ensuring that those working are competent
- Preventing others not involved from getting near the live conductors
- Indicating the live areas
- Using earth free areas
- Using residual current devices (RCDs)
- Ensuring adequate space around the live areas
- Ensuring that the floors are not slippery and that there is adequate lighting
- Having arrangements in place in case someone does come in contact with a live conductor and sustains an electric shock

10.4 ELECTRICAL ISOLATION PROCEDURE

All electrical plant, machinery or equipment MUST be isolated from any electrical source before commencement of any maintenance repairs and the correct procedures followed. All maintenance work, be it electrical or mechanical, MUST be documented and records maintained on the premises.

The following Code of Practice in relation to plant, machinery or equipment for Locking Off Procedures shall be implemented by all competent maintenance staff, engineers use grey padlocks, production staff setting up or cleaning production machines will isolate them using the red padlocks provided. For short duration work engineers will use their own personal padlocks.

- Assess the fault
- Locate the relevant isolator switch/box for the machine/plant/equipment.
- Check that the isolation of the particular machine/plant/equipment will not affect any other machine/plant/equipment. If other machine/plant/equipment is affected, then inform a manager/supervisor/operator to enable shutdown of affected machine/plant/equipment to take place.
- Select a suitable padlock and/or clamp required for the machine/plant/equipment main electrical isolator. Preferably, each maintenance operative should carry their own padlocks and key, utilising multi-haspadlock devices.
- Turn off the electrical supply at the isolation point, insert the padlock/clamp and attach an isolation label.
- Retain the keys and/or fuses on person to prevent inadvertent re-connection of the electrical supply by another party.
- On completion of maintenance work, ensure the maintenance log is completed and filed for reference.
- Remove the padlock/clamp and label.
- Restore electrical supply.
- Ensure machine/plant/equipment is fully operational, with the assistance of the manager/supervisor/operator if necessary, before handing over.

Information Sources

HSR25 Memorandum of guidance on the Electricity at Work Regulations 1989. Guidance on Regulations

HSG107 Maintaining portable and transportable electrical equipment

GS38 Electrical test equipment for use by electricians

Requirements for Electrical Installations:

IET Wiring Regulations 17th Edition (BS 7671:2008 incorporating amendment no 1: 2011)

11. ENVIRONMENTAL ISSUES

To aid in the preservation, protection and improvement of the quality of the environment the Company will reduce any adverse environmental effects to as low as achievable by best available techniques. Where there are a number of options for action involving plant, machinery, equipment, materials or processes the best practicable environmental option will be selected.

These activities include:-

- the selection of the least environmentally harmful products with, where reasonably practicable, raw materials from sustainable or recyclable sources;
- maximising the re-use, recycling and reclaiming potential of materials,, including paper, packaging and other consumable materials to the extent which is economically acceptable;
- minimising the use of energy for heating, lighting and power requirements;
- avoiding, so far as is reasonably practicable, emissions of harmful substances into the atmosphere and into water systems.

Noted environmental impacts include:-

- Waste production and disposal
- Water use and effluent discharge
- Energy use and associated emissions

Records will be maintained for the following:

- Waste Transfer Notes and Waste Consignment Notes
- Environmental Complaints
- Environmental Incidents
- Water and fuel consumption
- Correspondence from Regulators relating to the environment

12. EVACUATION PROCEDURE

Emergency Evacuation in response to a Works Alarm

Relevant to all site personnel, to ensure that all personnel, including visitors and contractors evacuate premises safely in response to a works emergency alarm. Note the fire alarm is tested for around 10 seconds every Friday morning at approximately 08.15, if the alarm sounds for longer or is heard at any other time the following procedure applies.

Procedure

On hearing the alarm

All personnel: (except those assigned specific emergency tasks).

- Unless specifically otherwise instructed and as long as it is safe to do so, switch off all plant and machinery immediately.
- Immediately evacuate all buildings via the nearest safe exit.
- Close doors and windows – if it is safe to do so, en route as you leave.
- Stop all vehicles in a safe position and switch off, leave the keys in the ignition (or equivalent). Vehicles shall not be driven to assembly points.
- Report immediately to designated assembly points and await roll call.
- Personal safety is the priority at all times and delays in exiting the building must not be caused by collection of personal belongings etc.

Visitors and contractors:

- Should be directed to the nearest emergency exit and return immediately to the assembly point 1 where a roll call will be taken. They shall remain there until given further instruction.

Departmental Emergency Marshalls:

- Conduct the roll call in accordance with procedure SOP 002.

Personnel with specific emergency tasks:

- Complete your tasks, as long as it is safe to do so, in accordance with procedure then report to your assembly point without further delay.

No personnel within the scope of this procedure (except individuals assigned with specific tasks or responsibilities) shall leave their assembly point until directed to do so by their fire marshal.

On returning to the workplace all personnel shall follow instructions given and shall not enter or tamper with any area or equipment that has been closed off or isolated.

Any personnel choosing not to follow any part of this procedure without reasonable justification may be liable to disciplinary action on the grounds of non-compliance with health and safety arrangements.

13. FIRE SAFETY

The potential causes of fire at Phoenix Foods have been assessed and include substances, some chemicals, paper and cardboard, they become a major fire risk. A specific fire risk assessment has been undertaken and the company will action any recommendations. Regular inspections will be completed to check on workplace standards, equipment standards and housekeeping which can all contribute to fire risks.

Prevention is dependent upon safe systems of work and daily awareness of hazards by all staff. Fire Drills will be held at regular intervals, at least annually and will be completed at different times to ensure all shift patterns are covered.

Do

- Report any defective electrical equipment or frayed cables
- Store flammable chemicals away from heat sources
- Take care with portable fires and heaters and reduce settings for over night winter use when appropriate
- Do not store combustible articles near heat sources

Do not

- Allow rubbish to accumulate – particularly in fire corridors, stair wells or exit routes
- Block fire exits
- Wedge open fire doors
- Smoke in or near the building
- Leave electrical appliances not be used switched on
- Block air vents

On hearing the fire alarm:

1. Leave the building by the nearest safe route and assemble by the visitors car park in the designated areas
2. Do not stop to get your personal belongings
3. Do not run but walk quickly
4. If possible, close all windows and shut doors as you go
5. Assemble at the assembly point
6. Do not re-enter the building until told to do so

If you discover a fire:

1. Raise the alarm
2. Dial 999
3. Describe the exact location of the fire
4. Do not attempt to fight the fire unless you have been trained and if safe to do so

Alarm Testing

The alarm will be tested on Friday of each week at 08.15am for a period of 10 seconds by the Engineering Manager.

No action is required by any personnel whilst the alarm is being tested.

Fire Drills

Fire drills will be held at regular intervals, at least annually with names and trained fire marshalls co-ordinating safe evacuation of the building.

Emergency Lighting

The emergency lighting will be tested on a monthly basis.

Know Your Fire Extinguisher

Nearly All new extinguishers are red – look for the colour of the sign and read the label to ensure you know what it contains.

Type	Colour code band	Use on:	Do not use on
Water	Red	Paper, Wood & Textiles	Electrical equipment Flammable liquids
Dry powder	Blue	Multi purpose	
Carbon dioxide	Black	Electrical equipment Flammable liquids	Paper, Wood & Textiles
Foam	Cream	Paper, Wood & Textiles Flammable liquids	Electrical equipment

PHOENIX FOODS SITE FIRE ORDERS

ON DISCOVERING A FIRE:

- 1. Shout 'FIRE' to warn people in the immediate vicinity.**
- 2. Raise the alarm immediately by operating the nearest fire call point.**
- 3. Call the fire brigade from a safe area by dialling 999.**
- 4. Leave the building immediately, report your actions to security and then report to your emergency roll call point.**
- 5. Stay at your roll call point until the fire officer or the senior person co-ordinating the incident operation tells you otherwise.**
- 6. You must only attack the fire if:**
 - a) you have been trained.**
 - b) your escape route is blocked.**
 - c) the situation is likely to endanger you.**
 - d) If the situation becomes uncontrollable proceed to your fire assembly point**

ON HEARING THE FIRE ALARM:

- 1. CONTINUOUS sounding of alarm. All persons not engaged in fighting the fire should leave the building immediately by the nearest escape route, ensuring, where it is safe to do so, that all windows and doors are closed before leaving themselves.**
- 2. Fire Wardens should check that all personnel have left the building.**
- 3. The nominated Roll Caller will carry out a roll call for the department.**
- 4. Report absentees to the fire officer or senior person co-ordinating the incident operation.**
- 5. Ensure all personnel remain in the assembly area until given permission to leave by the fire officer or senior person co-ordinating the incident operation.**

Make sure you know the location of your Fire Assembly Point and the alternative routes available out of the building from your work location.

- 1. Do not take risks.**
- 2. Do not stop to collect personal belongings.**
- 3. Do not return to the building for any reason until authorised.**
- 4. Do not use lifts.**

Departmental fire wardens have been designed and trained and they will co-ordinate any fire evacuation in conjunction with the nominated senior fire warden.

14. FIRST AID - Health & Safety (First Aid) Regs 1981

Adequate and appropriate first aid facilities will be available at all times. This includes first aid equipment and the provision of qualified first aiders. Refresher training for First-aiders will be provided as required.

First-aid has three main objectives:

- **To preserve life**
- **To prevent further injury**
- **To get the patient to medical aid**

First-aid kits are available in the following locations:

- By the hand wash station as the factory is entered via the laboratory
- On the wall by Indosa 2
- In the first aid room

Should you be involved in an accident or feel ill whilst at work, contact one of the trained first-aid personnel.

Details of the first-aiders and appointed people are posted on notice boards and throughout the factory.

The first-aiders are to ensure that the first-aid kits are kept fully stocked and items past their expiry date are replenished.

15. FORK LIFT TRUCK SAFETY

A small number of forklift trucks (FLT) and pallet loaders are a potential hazard in the workplace and so great care must be taken by the operators and by those working in the near vicinity when the vehicles are in use.

- Only trained personnel with a current certificate may drive a FLT or operate a electrically operated pallet loader
- The operator will check the FLT before use each day
- FLT routes must be unobstructed and kept clear at all times
- Individual drivers are provided with an individual key which must not be left in the truck when it is not in use

Forklift trucks will be serviced regularly by their supplier and maintenance records are maintained. In addition if any faults are identified during the daily pre use checks will be reported and additional visits by the supplier completed to remedy any problems. In addition the trucks will be inspected by the company insurer at least once every 12 months.

The daily check will include checking the condition of:-

- Tyres
- Brakes
- Steering mechanism
- Horn
- Lights
- Gauges
- Forks
- Chains
- Hydraulics
- Fuel supply

All faults must be reported and the vehicle disabled if necessary to prevent further use whilst repairs are completed.

Any company fork lift truck **must never** be used to raise people up without the purpose designed attachment connected to the forks.

Log sheets to show daily checks have been completed are found at each FLT charging station.

16. HOUSEKEEPING

Poor housekeeping is one the major causes of slips, trips and falls in workplaces. These types of accidents in turn are the most common cause of major injury at work.

These types of accidents can be avoided adhering to some simple common sense rules as follow:-

- keep the work area tidy
- do not allow articles or cables to trail across pedestrian walkways
- store away items not in regular use in the designated place
- store waste in the correct containers
- do not place heavy items on top shelves
- dispose of harmful waste including broken glass safely.
- keep routes clear and uncluttered
- clear up spillage immediately

To help achieve a high standard of housekeeping the Company will ensure that adequate numbers of suitable waste containers and recycling bins are provided and emptied on a regular enough basis.

All employees can help Phoenix Foods to achieve this by ensuring that the correct containers are used and incidents of poor housekeeping e.g. overflowing bins are reported to a supervisor / manager so that remedial action can be taken.

17. INSPECTIONS

Inspections identify hazards in the workplace and involve viewing an area and noting any problems. Inspections are an opportunity to identify any necessary remedial action.

The Engineering Manager or nominated H&S Adviser will undertake inspections of the building on a quarterly basis.

Basic Checklist:-

Item	Check for	Remedial Action
Floors	<ul style="list-style-type: none"> Are surfaces even? Are surfaces slippery? Are there any spillages? Is the floor clean? Are there any damaged tiles or carpet? Are bins and containers available to keep items contained? 	
Stairs	<ul style="list-style-type: none"> Are they worn, slippery or chipped? Are handrails secure? Is lighting adequate? Are stairs free from litter and obstructions? 	
Exits and Doors	<ul style="list-style-type: none"> Are door mechanisms stiff or defective? Do any doors have sharp edges? Are passages or doorways obstructed? 	
Equipment	<ul style="list-style-type: none"> Do all electric plugs and sockets appear visually sound? Are cables in good condition? Are there any trailing leads? Are machine guards in place? Are individual items of equipment in good working order? Are trolleys suitable? 	
Storage	<ul style="list-style-type: none"> Is there anything stored on top of lockers or high cupboards? Are steps available to reach high shelves? Does anything stored obstruct either gangways or equipment? Are hazardous substances properly stored? Are there designated storage areas? Are storage areas tidy? 	
Windows	<ul style="list-style-type: none"> Are all window mechanisms in full 	

	<p>working order? Is there any broken or cracked glass? Do windows protrude where they could cause injury. (inside or outside) Where necessary are window poles available and kept in retaining clips.</p>	
Lighting	<p>Is the lighting adequate? Are light switches properly positioned? Are lamps, switches and sockets in good condition?</p>	
Fire	<p>Are the extinguishers provided appropriate? Are they positioned correctly? Is access to appliances unobstructed? Are appliance signs clear and correct? Are fire instructions exhibited and up to date? Are fire doors wedged open?</p>	
Furniture & Fittings	<p>Are room layouts safe? Are any chairs worn or broken? Are all swivel chairs correctly adjusted and in good working order?</p>	
Miscellaneous	<p>Are dangerous areas properly marked with appropriate warnings? Is there limited access to dangerous areas? Are all tools in good working order? Are there any defects in the heating system? (i.e. leaks) Are there any fumes or vapours which could be harmful?</p>	
Personal Protective Equipment	<p>Is PPE worn when required? Are users aware of cleaning and storage arrangements? Is PPE stored safely?</p>	
Chemicals	<p>Are chemicals in suitable marked containers?</p>	

	<p>Are lids kept on when not in use? Are chemicals kept in a suitable storage area/cupboard? Are spillage and emergency arrangements available? Are there arrangements for disposing of chemicals safely?</p>	
<p>Other : Local hazards</p>		

18. INSPECTORS

There are three main types of external inspector who have authority within Company premises. These are the Fire Officer, Health & Safety Executive Factory Inspector and the Environmental Agency. All have the similar powers but they are responsible for different aspects of health, safety and the environment.

HSE Inspector - All areas except the kitchens, all safety requirements except fire safety.

Fire Officer - Appointed by the Fire Authority with authority solely for fire safety issues.

Environment Agency – environmental issues e.g. waste and pollution.

All inspectors have the following **legal powers.**

- to enter at any reasonable time (i.e. anytime when employees are at work)
- to bring others on site (including the police if the inspector is prevented from entering)
- to investigate and examine
- to direct that an area be left undisturbed (i.e. after an accident)
- to take photos, samples and tests
- to take possession of anything for as long as necessary
- to take statements and ask questions
- to inspect records
- to have adequate facilities

Action the inspector may take

- Verbal suggestions
- Informal report - with advice
- Formal written report with advice
- Improvement Notice - there is a breach of legislation and a timescale for the improvement is set
- Prohibition Notice - This can stop the use of an area, activity or item of equipment. It is immediate and stays in place until improvements have been made.
- Prosecution - as a last resort

Since the later part of 2013 HSE inspectors have an additional right under the "Fees for Intervention" programme.

Fee for Intervention (FFI) is HSE's cost recovery regime which started on 1 October 2012. Duty holders who are compliant with the law, or where a breach is not material, will not be charged FFI for any work that HSE does with them. The scheme only applies to HSE enforcement not local authorities.

A material breach is when, in the opinion of the HSE inspector, there is or has been a contravention of health and safety law that requires them to issue notice in writing of that opinion to the duty holder.

Written notification of the contravention must be provided:-

- Instant inspection report
- Email
- Formal letter

- Improvement notice
- Prohibition notice
- Notice of prosecution

It must contain :

the law that the inspector's opinion relates to;
the reasons for their opinion; and notification that a fee is payable to HSE.

Note that you do not have to be served with an improvement or prohibition notice to receive a material breach notice.

Currently the fees will be charged at £124 per hour, but this could be more if the HSE have to seek further external specialists advice.

Invoices will be issued every two months.

It is therefore very important that organisation takes steps to ensure legal compliance and that employee and others are protected.

19. LEGIONELLA

CONTROLLING THE RISKS OF LEGIONELLA AND LEGIONNAIRES DISEASE

Legionnaires' disease is a potentially fatal form of pneumonia, resulting from the inhalation of a fine water mist contaminated with a virulent strain of legionella bacteria. This procedure aims to ensure the risks to employees and members of the public are minimised.

The legionella bacteria breeds in water, its ideal home is in water cooling towers and water distribution systems where if the water becomes aerated, it can be breathed in. This causes a type of pneumonia. The organism survives best in temperatures between 25-45 °C, where water is stagnant and may affect those whose resistance is already weakened such as the elderly and young children.

Legionella can be present in the following areas:-

- (a) water systems incorporating a cooling tower;
- (b) water systems incorporating an evaporative condenser;
- (c) hot and cold water systems; and
- (d) other plant and systems containing water which is likely to exceed 20°C and which may release a spray or aerosol during operation or maintenance such as vehicle washers, humidifiers and spa baths.

Legal requirements on the control of legionella are established in the Control of Substance Hazardous to Health Regulations 2002 as amended, these standards are supported by an approved code of practice and guidance document number L8. This is accepted as the specification for a control system for Legionella. The standards in this document are followed to ensure are maintained to reduce the risks involved, this approach forms the basis of the control scheme within Phoenix Foods. Employees may be working with hot and cold water systems and therefore may be exposed to legionella if it is not exposed but also their work can have an impact on the water system and risks involved.

To ensure the risks of the legionella multiplying to dangerous levels the following control regime is in place within Phoenix Foods:

- Control of legionella procedure (this document)
- Responsibilities for legionella control are identified
- A written scheme for the control of legionella has been completed by "WET" is in place.
- A named competent person and company is appointed to carry out any necessary examinations and testing.
- Ensuring all staff or contractors working with water systems are trained and informed of the risks of legionella and the action they can take to reduce the risks, they also need to have access to the written scheme for the system being worked upon.
- Effective liaison with the person appointed on the site to manage legionella
- A risk assessment of the risks of legionella will be completed
- Temperature checks of the water system are completed on a monthly basis
- Annual cleaning and disinfection of water tanks

The arrangements in place aim to comply with the general obligations of every employer under section 2 and 3 of Health and Safety at work Act 1974 and the Management of Health and Safety at Work Regs 1999. The risks of legionella will be assessed and it will identify

and evaluate the sources of risk, show the means by which exposure to Legionella bacteria is to be prevented and if prevention is not reasonably practicable, the means by which risk will be controlled.

All employees need to play their part in controlling the risks to themselves and others who may be effected, they have a duty to:

- Follow the training they have been given
- Follow safe work procedures provided and any relevant parts of the written scheme
- Report any areas of concern where they feel there may be an increase risk of legionella bacteria proliferating.
- Only using approved substances, materials and equipment in the maintenance and repair of water system.
- Use work methods which minimise the likelihood of water aerosols.

Information Sources

L8 COSHH Legionella ACOP

20. LONE WORKING

The Health and Safety at Work Act 1974 requires the Company to provide a safe environment, safe equipment and safe systems of work for its employees and those working on its premises. These requirements are applicable to all work situations and particular attention must be paid to situations where staff are working alone or outside normal working hours. This statement supports the principles set out in the main Company Health and Safety policy and as such does not repeat the standards already stated there.

Working alone can introduce or enhance hazards, e.g. lack of assistance if needed, first aid cover, emergency situations, violent attack etc. There are inevitably tasks within the Company where staff work by themselves and some lone working may occur in the evening and at weekends, however these do occur on rare occasions only.

The company acknowledges that there may be an increased risk to the health and safety of its employees and contractors when working alone, in a majority of occasions lone working does not occur at company work site.

If lone working is to occur appropriate risk assessments shall be undertaken to identify risks to the lone worker and measures shall be introduced to minimise those risks wherever reasonably practicable, the following procedure will be followed.

Staff shall be provided with information, instruction and training as appropriate in order to minimise risk when working remotely from colleagues or other persons and / or outside normal working hours.

Particular consideration shall be given to:

- (a) assessing if the work is a "one person" job
- (b) the remoteness or isolation of the workplace
- (c) any problems of communication
- (d) the possibility of violence or criminal activity by intruders
- (e) the nature of possible injury
- (f) emergency egress (e.g. are fire exits open out of hours?)

Working alone is specifically prohibited by law in a small number of well defined dangerous situations such as working with live electrical conductors and entry into confined spaces. However, there is no general legal prohibition on working alone and the Company's responsibility to ensure the health and safety of staff and others affected by its activities applies to anyone working alone.

LONE WORKING RISK ASSESSMENT ARRANGEMENTS

Lone work is work which is specifically intended to be carried out unaccompanied or without immediate access to another person for assistance. It is not the same as the chance occurrence of finding oneself on one's own; for example, in every workplace there is somebody who arrives first and somebody who leaves last, or an individual may need to go to an unoccupied storeroom. An individual who has either visual or audible communication with another person would not be considered as working alone.

Lone working can occur:

- during normal working hours at a remote location either within the normal workplace or off site,
- when working outside normal working hours.

- when working in a fixed establishment with no other persons on site, or when others may be elsewhere on site
- working in a remote location including indoors
- working in Client's premises
- travelling in the course of work

The hazards associated with a task are likely to be the same whether it is carried out alone or accompanied although there is a greater possibility of violence towards a lone worker.

Although the hazards may be the same in any role, there may be an increased risk to those undertaking lone working, as the worker may not have access to equipment or other people for support.

Although working alone may not introduce any new hazards, the risks may differ significantly when a task is carried out unaccompanied.

General risk assessments covering Company activities and workplaces have been completed but where workers are working on their own, a local lone working risk assessment will be completed. This is to ensure that adequate controls are in place to ensure the safety of the employee and others who may be affected. This will check that the work can be done safely by an unaccompanied person and make sure that an individual working alone is not exposed to greater risks than employees who work together.

Lone workers should not be at more risk than other employees and extra risk control measures may be required. Precautions should take account of normal work practices and foreseeable emergencies such as fire, equipment failure, illness and accidents.

Where a general risk assessment highlights a significant risk to those lone working a further more detailed assessment will be undertaken.

Those with responsibility for carrying out lone working risk assessments will ask questions such as:

- Does the workplace present a special risk to the lone worker?
- Is there a safe way in and out for one person?

If working outside of normal hours, checks should be made to ensure that all exits from a building can be used as means of escape in case of an emergency. Lone workers should not be expected to leave their workplace by way of dark corridors or stairways. Special arrangements may need to be made to ensure that lights are kept on in buildings when people are working outside normal hours.

- Can any necessary temporary access equipment, such as portable ladders or trestles, be safely handled by one person?
- Are the welfare facilities adequate?
- Can all the plant, substances and goods involved in the work be safely handled by one person?

Consider whether the work involves lifting objects too large or heavy for one person or whether more than one person is needed to operate essential controls for the safe running of equipment. It is generally unacceptable for people to work alone with powered workshop machinery because of the possibility of contact with dangerous parts.

21. MANUAL HANDLING

Under the Manual Handling Operations Regulations 1992, as amended in 2002 ('the Regulations'), each employer shall, so far as is reasonably practicable, avoid the need for employees to undertake any manual handling operations at work which involves a risk of injury. It is Phoenix Foods policy that these Regulations are complied with, and the procedures to adopting a safe system of work are set out in this document.

Manual handling is not just lifting, it is all those operations that require physical effort to move an object from A to B. The Regulations apply to a wide range of manual handling activities including lifting, lowering, pushing, pulling or carrying.

The load may be either inanimate – such as a box or a trolley, or animate – a person or an animal.

Lifting Limitations

There are no specific limits on how heavy a load should be, as clearly much depends on the physical capability of the individual and can be influenced by:

- Age
- Health
- Gender
- Physique

Particular care should be exercised by those who are:

- Pregnant
- Returning from maternity leave
- Returning from operations
- Returning from sickness
- Those with pre-existing health problems.

In any case, avoid use of single components weighing in excess of 25kg. When ordering goods/materials, the weight should be restricted to 25kg bags/boxes

This policy operates in conjunction with the Company's general Health & Safety Policy. This policy and its supplementary procedures and standards outline the Company's approach to manual handling as well as individual responsibilities for carrying out its provisions.

This policy provides an overall statement for the safe movement and handling of loads and is supported by operational procedures lifting standards.

The Company recognises that musculo-skeletal injuries are a problem which can affect the organisation. The Company will take steps to reduce and eliminate, as far as is reasonably practicable accidents related to the movement of loads.

Manual Handling Objectives

The Company will:

- endeavour to avoid the need for employees to undertake manual handling tasks where reasonably practicable.
- assess those situations where manual handling cannot be avoided.
- reduce the risks of injury as far as is reasonably practicable.
- develop and implement safe systems of work and investigate manual handling accidents to prevent a recurrence.
- create a safe working environment in relation to manual handling activities
- provide information, training, instruction and supervision for all personnel undertaking manual handling tasks.
- ensure that adequate maintenance systems are in operation for all equipment provided to reduce the risk of manual handling injuries

Risk Assessment

The local manager is responsible for completing the Manual Handling Risk Assessment, for those duties which involve unavoidable manual handling, for example:

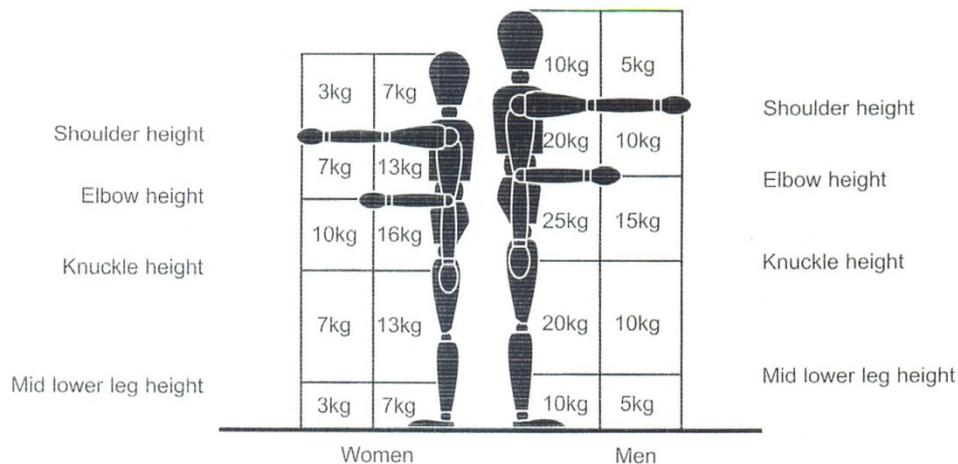
- Carrying of large boxes/bulky items
- Moving equipment
- Repetitive actions involving small items on conveyors
- Moving objects over a long distance
- Loading and unloading machinery with packaging
- Lifting of equipment etc

Assessments will be carried out using the Manual Handling Assessment Form (Form 9) and guidelines contained in HSE Guidance on Manual Handling Operations, L23, where the risks are not significant they will be covered on the general risk assessment for the individual task or situation. The assessment will individually assess the risk associated with the Task, Load, Individual and the working environment.

All assessments should be recorded and communicated to all relevant staff. The risk assessment must be carried out prior to the task being undertaken and upon a change in circumstances on the individual(s) or task(s).

All manual handling operations identified as having a significant risk will have the results of the assessment recorded, whether or not the assessment can be easily repeated, in order to demonstrate that it has been carried out.

Staff undertaking ad hoc manual handling activities should only do so if they are able to move the item safely, if the item is large or bulky then assistance should be sought.



Employees have responsibilities to:

- present themselves in a suitable mental and physical condition to undertake their duties
- co-operate with health and safety measures introduced, including the use of trolleys, which are all designed to protect them from injury.
- report any hazards or injuries which could affect their ability to lift.
- seek advice from their manager in any situation where they are unsure of the correct procedure to adopt.
- assisting and co-operating in the assessments of manual handling tasks in their areas.
- attend manual handling training sessions

The Safe Movement of Loads - Practical Guidance for Staff

- Check that the area where you are working is clean and unobstructed
- Check the item for any indication of its weight or stability
- Check to see if you are able to lift the item by moving it slightly – if it is too large or too heavy - seek assistance
- Stand near to the load with your feet shoulder width apart
- Bend your knees and keep your back straight
- Get a good grip with your palms - not fingers
- Keep the load close to your body
- Slowly raise the load
- Look up as you lift

Arrangements and procedures for manual handling operations:

1. Work areas will be kept in good condition, free from slipping and tripping hazards with clear access to the load.
2. Wherever straightforward, loads will be split into smaller loads to reduce the likelihood of injury.
3. Where lifting teams are working, a team leader will be nominated to co-ordinate the effort.
4. For the lifting of heavy or awkward shaped materials, equipment or loads, mechanical assistance (including fork lift trucks, trolleys, hoists and pallet trucks) will be provided wherever reasonably practicable.
5. Gloves and safety footwear will be introduced, where identified as necessary in the risk assessment.
6. The distance loads have to be carried must be reduced to the minimum, including taking the work activity, e.g. unpacking, to the load if necessary.
7. Where distances are excessive, manual handling must not be used.
8. Wherever reasonably practicable, manual-handling tasks will be automated or mechanised.
9. Loads of any weight and that are large enough to obscure vision, e.g. empty boxes, must not be carried manually. They will be placed on trolleys or pallet trucks, as necessary, and pulled so that the operator has a clear view of the route.
10. Loads must not be stacked above chest level by hand. A suitable, stable platform must be used to stand on.
11. Employees who are engaged in manual handling operations will be trained in the correct techniques, including team lifting and kinetic handling, and any additional techniques for special loads.

Information Sources

- *L23 Manual handling. Manual Handling Operations Regulations 1992 (as amended). Guidance on Regulations*
- INDG383 Manual Handling Assessment Charts
- *Getting to grips with manual handling: A short guide* INDG143(rev2)
- *Aching arms (or RSI) in small businesses* INDG171(rev1)
- *Mark a parcel - save a back* INDG348
- *Manual handling assessment charts* INDG383
- *Are you making the best use of lifting and handling aids?* INDG398

Getting to grips with manual handling

Good handling technique

Here are some important points, using a basic lifting operation as an example.

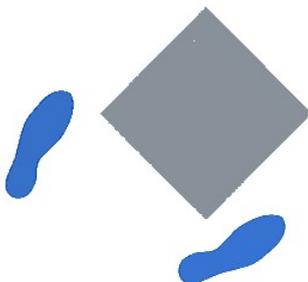
Stop and think

Plan the lift. Where is the load to be placed? Use appropriate handling aids if possible. Do you need help with the load? Remove obstructions such as discarded wrapping materials. For a long lift, such as floor to shoulder height, consider resting the load mid-way on a table or bench to change grip.



Position the feet

Feet apart, giving a balanced and stable base for lifting (tight skirts and unsuitable footwear make this difficult). Leading leg as far forward as is comfortable and if possible, pointing in the direction you intend to go.



Adopt a good posture

When lifting from a low level, bend the knees. But do not kneel or overflex the knees. Keep the back straight, maintaining its natural curve (tucking in the chin helps). Lean forward a little over the load if necessary to get a good grip. Keep the shoulders level and facing in the same direction as the hips.



Get a firm grip

Try to keep the arms within the boundary formed by the legs. The best position and type of grip depends on the circumstances and individual preference; but must be secure. A hook grip is less tiring than keeping the fingers straight. If you need to vary the grip as the lift proceeds, do it as smoothly as possible.



Getting to grips with manual handling

Keep close to the load

Keep the load close to the trunk for as long as possible. Keep heaviest side of the load next to the trunk. If a close approach to the load is not possible, slide it towards you before trying to lift

Don't jerk

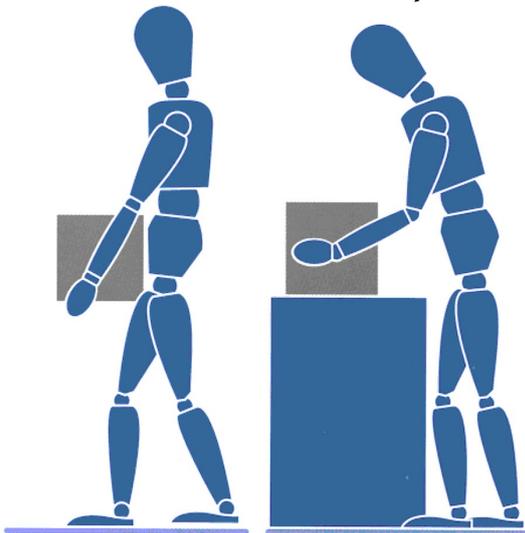
Lift smoothly, raising the chin as the lift begins, keeping control of the load.

Move the feet

Don't twist the trunk when turning to the side.

Put down, *then* adjust

If precise positioning of the load is necessary, put it down first, then slide it into the desired position.



8

How do I know if there's a risk of injury?

It's a matter of judgment in each case, but there are certain things to look out for, such as people puffing and sweating, excessive fatigue, bad posture, cramped work areas, awkward or heavy loads or a history of back troubles. Operators can often highlight which activities are unpopular, difficult or arduous.

Can you be more definite?

There is no such thing as a completely 'safe' manual handling operation. It's difficult to be precise: so many factors vary between jobs, workplaces and people. But the general risk assessment guidelines filter (see section 9) should help to identify when a more detailed risk assessment is necessary. Working within the guidelines will reduce the need for a more detailed risk assessment.

AQS-SE-140c

22. METHOD STATEMENTS (STANDARD OPERATING PROCEDURES/ SAFE SYSTEMS OF WORK) - COMMON ELEMENTS

A Method Statement or Standard Operating Procedure (SOP) is the written proposed method of work for the job task.

What should it include?

- A single document and preferably include clear descriptive diagrams.
- Be given a unique reference for clarity of application, together with the date of issue and any revisions.
- Identify problems and their solutions to enable a safe system of work to be planned.
- Be easily understood with all technical words explain
- Follow a logical sequence of events.
- Detail the arrangements planned for the protection of the contractor's employees, the company employees and any other persons who may be affected by the planned work activity.
- Detail what plant, equipment and substances that will be used, highlighting any associated risks and precautions.
- Detail any necessary programming of work including co-ordination between different parties involved, for example, the necessity for raising permit to work procedures or the timing of deliveries.
- Detail who will undertake the role of supervision and co-ordination and provide information on the competency of any persons who may undertake specific tasks i.e. electrician, scaffolder.
- Detail any relevant site features, layout and access, with notes on how these may affect the proposed arrangements and methods of working.
- Indicate any emergency measures that may be appropriate if the planned sequences of events are disrupted.
- Be capable of being modified to cater for any planned change in the work activity.

In short, the Method Statement / SOP must: -

- **Inform the reader of the risks associated with the job task.**
- **Inform the reader of what precautions will be taken when faced with those risks.**
- **Inform the reader of who will provide those precautions.**

23. NOISE

Loud and excessive noise at work can cause irreversible hearing damage. It accelerates the normal hearing loss that generally occurs as we grow older. It can cause other problems such as tinnitus (ringing in the ear), interference with communication and stress.

Any worker exposed to areas with high noise levels must wear adequate ear protection where the noise levels or exposure cannot be eliminated or reduced. Precautionary measures need to be implemented if the level of noise reaches 80 decibels (80dB(A)). As a rule of thumb, if normal conversation cannot be carried out on two metres away from the source of the noise, then this noise level is likely to exist.

Typical noise sources at Phoenix Foods include a variety of machines and equipment some of which could be generating noise levels of over 80 decibels these include the:-

- Compressors
- Production machinery
- Engineering work shop machinery
- Pressure washers

Based on the findings of noise surveys the noise levels in the operational areas of the factory range from 79 dB(A) up to 84 dB(A). However there are a small number of tasks where the use of ear defenders is compulsory due to the noise levels generated. Employees will be trained and instructed on these and provided with suitable ear defenders which must be worn at all times when these activities or areas are entered.

Improvements in working practices and machinery guarding have contributed to reduced noise levels.

If noise levels reaches 85dB(A) (if you cannot hear somebody clearly at around 1 metre away), a person with the necessary skill and experience will need to assess the situation and recommend further action.

Our policy is to take all reasonable steps to ensure that the risk of hearing damage to our employees who work with noisy equipment or in a noisy environment is reduced to the lowest practicable level.

A noise survey will be undertaken, with its results being used to complete a noise risk assessments will identify situations in which working within a noisy environment (as defined in the Control of Noise at Work Regulations) and whether any of the action limits are exceeded. In such circumstances control measures will be implemented.

Noise is a physical hazard which can cause both short and long term health problems. Noise is measured in decibels, this is a measure of the loudness of the sound, the pitch or tone of the noise is also a factor in the development of hearing problems.

The action levels consider a person's daily exposure to noise, taking into account the different activities they undertake in a typical day, as well as any noisy and quiet periods. Action will be taken to reduce employee exposure to noise to as low a level as possible, contractors will be expect to take steps to reduce noise to their employees and those of the Phoenix Foods Ltd.

The following action must be taken by the employer if these noise levels exist.

LOWER ACTION LIMIT 80 dB(A) Lex

- carry out noise survey and record it
- inform employees of the danger of working in noisy areas
- provide suitable hearing protection
- train employees in the use of hearing protection

UPPER ACTION LIMIT 85 dB (A) Lex

- reduce noise levels as far as is reasonably practicable by engineering means
- sign areas as noise zones
- provide and ensure use of hearing protection
- inform / train employees in use of hearing protection

* The term dB, stand for decibel, the (A) depicts that the noise measured is only that which is detectable by the human hearing mechanism and the Lex identifies the amount of noise a person is exposed to over a typical shift of 8 hours as opposed to a one off loudness of one noise.

24. PERMITS TO WORK

Where the risks are very high, a formal safe system of work may be required. This can be in the form of a Permit to Work. Certain tasks require that permits are issued before the task is undertaken, they mainly relate to maintenance and building work, they will also be used to control the work carried out on site by contractors.

Examples: Entering a confined space, work at height, lifting operation and work outside daylight hours.

The permit, once issued, will lay down very specifically what precautions must be taken. Permits can only be issued by authorised and named people, they authorise the work before it starts and they sign it off when the task is completed.

Permit Issue Procedure

This procedure has been written to ensure that all people involved in issuing permits are aware of their responsibilities and the process of issuing a permit. This is to minimise the risk of any unforeseen accidents or incidents occurring.

It is the responsibility of everyone involved in issuing a permit to follow this procedure and to ensure that it is adhered to.

Scope

The following steps should be followed when issuing a permit.

1. Ensure that contractor / persons that the permit is been issued to have completed a site induction.
2. Review the Method Statement to see that it is in line with the task that is going to be completed.
3. Review the Risk Assessment to make sure that it is relevant to the task that is going to be carried out.
4. Assess the area that the permit is going to be issued to and is fitting to the Method Statement and Risk Assessment.
5. Issue the Permit to work and any other relevant permits.
6. The contractor is to retain the white copy at all times while on site and return it to the permit folder prior to leaving site.
7. Complete the details on the Contractor Control board sheet in the front of the folder.
8. Monitor the contractor through out their duration on site to make sure that they are complying with their Method Statement and company standards.
9. When the work is completed, an inspection of the area and work completed is to be done to ensure that all is left in a correct state.
10. Sign off the permits making sure that the Contractor Control Board sheet is update.

Information: See useful forms section of this policy manual

25. PERSONAL PROTECTIVE EQUIPMENT - Personal Protective Equipment Regulations 1992

Personal Protective Equipment (PPE) is any equipment or device worn or held to protect a person from a hazard, i.e. anything which could cause them harm. The term PPE does not include regular uniform nor sampling devices such as those used to detect fumes or vapours.

Every item of PPE worn at work must be suitable:

- for the person
- the task
- the hazard.

It must also be compatible with any other PPE used. For instance a face mask may obscure vision through goggles. Goggles may prevent ear defenders from sealing properly.

Basic training on usage, storage and maintenance must be given to ensure employees issued with PPE, use and store the equipment safely. They must also be aware of the procedure for getting a replacement when defects become apparent.

Safety footwear will be worn by all those entering the factory area.

Spare safety footwear will be available for visitors.

White Coats and hair nets will be worn in all production areas.

26. PREGNANCY RISK ASSESSMENT

Pregnancy is not an illness or a disease, pregnant women are as capable of work as any other employee if full consideration is given to their condition throughout the term of their pregnancy. It is therefore important that a risk assessment be carried out as soon as possible after you have been notified about their pregnancy.

Who carries out the assessment?

The nominated H&S Adviser /HR officer will see the individual and consider any risks which are part of their job, after this they will advise the manager of any potential issues and how they can be dealt with. Information is recorded onto a Pregnancy Risk Assessment Form which is then sent to the manager giving details of what additional action the manager needs to take if applicable.

The main focus of the assessment is to ensure that the employee is not put at risk. This means ensuring that accidents and injury, to both the mother and unborn child, are prevented as far as possible.

Generally, modern health and safety management techniques, which we already have in place to control risks to the workforce, should be sufficient.

Existing controls which do not offer adequate protection to new and expectant mothers must be adapted accordingly. Section 7 of the Health & Safety At Work Act places a personal duty on every employee to look after the safety of themselves but there is still an increased responsibility on the employer.

The specific requirement to assess the risks to new and expectant mothers is brought about by the Management of Health & Safety at Work (Amendment) Regulations 1999.

The Components of a Risk Assessment

A risk assessment requires employers to identify the hazards, evaluate the risks, (taking into account the likelihood and severity of the outcome) and determine the necessary control measures associated with :

- the work activities undertaken
- materials and articles used
- work equipment used
- the workplace, workstation and working environment

This risk assessment is carried out by the nominated H&S adviser in conjunction with the individual and their manager.

See "Form 8 " for an example of the form used to record pregnancy risk assessments.

27. RISK ASSESSMENT

The term risk assessment appears in many different sets of Regulations; Control of Substances Hazardous to Health, Management of Health & Safety at Work, Manual Handling, Display Screen Equipment Regs etc. The process referred to in all of these pieces of legislation is identical.

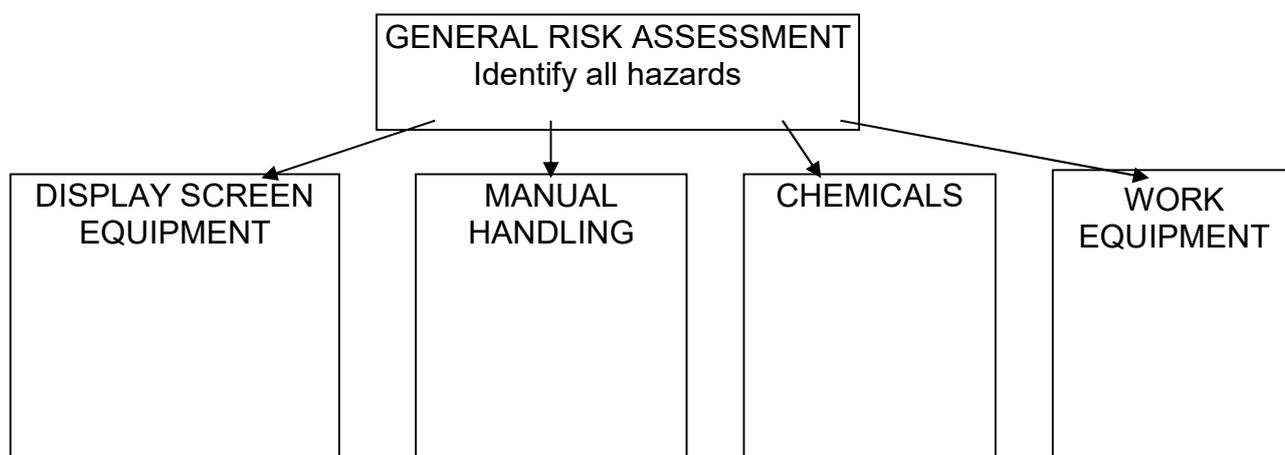
The aim of any risk assessment is **to prevent** accidents and injury. It requires all employers to examine their processes, equipment, workplaces and work practices to highlight where the potential for accidents exists. Once the hazards (anything which has the potential to cause harm) are identified, the risk assessment requires the employer to evaluate the risk. This involves looking at the hazard and considering how likely it is that it will cause injury as well as the possible severity of the injuries which could be caused. This is by no means an exact science but by doing an assessment risks can be identified as high, medium and low which will allow priorities to be set for improvements.

General risk assessments have been completed for typical factory and engineering activities, but individual task assessments are also completed for one off and unique situations which may arise to ensure all the hazards and risks are considered and specific control measures taken to reduce the risks involved.

The Basic Process:

1. Identify the hazards - in relation to processes or the workplace.
2. Identify who is at risk - consider employees and others.
3. Identify any existing controls - have people been trained?
4. Evaluate the risk - consider possible likelihood and severity.
5. Take action to reduce the risk of accidents - consider long and short term action.
6. Review - if there are any changes.
7. Monitor - have improvements been implemented? If yes, have they worked?

The process is always the same. However, the actual specific items examined will differ depending on the type of risk assessment being completed. The Management of Health & Safety at Work Regs require a general risk assessment of all work operations. From these more specialist risk assessments will flow.



THE RISK ASSESSMENT PROCESS GUIDANCE

a) Identifying Hazards

When seeking out and identifying hazards, adequate information is necessary and reference should be made to relevant sources such as:

- Legislation and approved codes of practice
- Health and Safety Executive Guidance
- Product information - manufacturer guidance
- Personal knowledge of managers, colleagues and safety reps
- Accident records
- Expert advice

In the simplest cases hazards can be spotted by observation and questioning. They may be identified by individual activities, people or work areas depending on the nature of the area(s) being assessed. Some tasks may be undertaken by several people in the same department so an assessment covering the task or activities would be more appropriate than one covering each individual. Individual aspects about the people will need to be taken into account i.e. one person may be 5 feet tall the other 6 feet 2 inches, therefore further risks may be applicable to one employee rather than the other.

b) Identify Those at Risk

In most cases the person at risk will be the person actually involved in the work. It is however important to remember third parties including members of the public, visitors, contractors etc who could be affected by the hazard.

c) Are There Any Existing Controls?

Are there any existing controls which are already helping to reduce the risk of injury?

- i.e.:
- Have employees been trained?
 - Is PPE worn?
 - Are warning signs displayed?

Remember to include only those existing controls which are working effectively. If you know that face masks are available but they are not worn or are not suitable then this is not an existing control measure.

d) Evaluating The Risk

Evaluating the risk involves judging the likelihood and the severity of the harm that may arise as a result of the hazard.

Some risks will be insignificant either because the likelihood is very low or because the severity of injury is very low or both.

If we have difficulty in deciding the risk level (High, Medium, Low) it may be helpful to consider some form of quantifiable risk assessment. In its simplest mathematical form:

Risk = Hazard Severity X Likelihood of Occurrence

A scoring system can be used to help in this process but is not an essential part of a risk assessment.

	5	M	H	H	E	E
Severity	4	L	M	H	H	E
	3	L	M	M	H	H
	2	L	L	M	M	H
	1	L	L	L	L	M
		1	2	3	4	5
		Likelihood				

Severity

- 1 No injury but damage or loss
- 2 Trivial injury
- 3 First aid injury
- 4 Major Injury
- 5 Fatality

Likelihood

- 1 Unlikely
- 2 Possible
- 3 Could occur or I've heard of it before
- 4 Frequent or "it has before"
- 5 Common or occurs frequently

- L** Monitor and manage **M** Monitor and maintain strict measures **H** Review and introduce additional controls to lower the level of risk
E Do Not Proceed - Immediately introduce further control measures to lower the risk. Re assess before proceeding.

e) Decide On Measures

The measures which will be required to minimise or remove risk need to be considered by applying a hierarchy of risk control. This is the important part of every risk assessment as it is here where we are required to take action to reduce the risk of injury.

- 1 **Eliminate the Risk** e.g. Is it possible to stop using the chemical or piece of equipment?
- 2 **Substitute** e.g. Can we use a less hazardous substance?
- 3 **Engineering Controls at Source** e.g. Guards and safety devices
- 4 **Re-design** workplace of task
- 5 **Safe Systems of Work** e.g. Standard Operating Procedures which are communicated
- 6 **Training & Supervision** - If employees are trained supervision will be needed to ensure the training is followed
- 7 **Warning Signs** - these do not eliminate the risk but do raise awareness
- 8 **Maintenance of equipment** - to prevent accidents from using defective equipment
- 9 **Good Housekeeping** - having clear routes, safe storage
- 10 **Personal Hygiene**
- 11 **Personal Protective Equipment** - As a last resort because the hazard is still present

This is by no means an exhaustive list as certain specific controls will be needed to suit certain work areas.

f) Record The Assessment

It is a legal requirement under the Management Regulations for all employers with over five employees to record their assessments. Blank forms can be found in the Useful forms section of this manual.

The information to be recorded must include:

- The significant hazards i.e. the hazards which pose serious risk to workers or others if not adequately controlled.
- The existing controls in place, this section can refer to other documents e.g. COSHH assessments
- The people who are at risk

g) Monitor / Review

The risk assessments will need to be monitored regularly to ensure action has been taken. This is will be completed by the hire manager or external contractor on at least an annual basis.

See form 5 for a template general risk assessment form and the task specific RA form which is used to supplement the general assessment.

28. SAFETY MONITORING AND MEASURING

It is important that we are able to maintain and, importantly, to further develop our health and safety management systems and procedures. Monitoring of health and safety standards will be done to ensure the company is meeting the standards required and will be done in a range of ways.

The following key elements will be monitored to ensure they are effective:

- The H&S policy.
- Arrangements for Planning for H&S issues.
- Implementing and Operating including risk assessments, safe systems and training provision.
- Measuring systems via work place inspections and accident trends.

This includes monitoring:

- Progress against objectives and targets
- Training on H&S issues
- The completion of risk assessments
- The number of actions completed as a result of a risk assessment
- The results of accident investigations
- Accident trends
- The findings of any investigations into RIDDOR accidents
- Time lost due to work related accidents and ill health

In addition the H&S inspections of the Phoenix Foods site will be completed at least every six months to ensure that the standards set are being adhered to and to identify any weaknesses where the unit may need to complete improvements in the standards required. A template workplace inspection check list can be found in section 16 of this H&S policy. Inspections will cover the key issues that need to be monitored for any particular part of the business. The inspection should cover the following main items:

- Premises
- Plant & Substances
- Procedures
- People

See the form on the section on “Inspections” these will be used to complete Health and Safety inspections of the site.

Auditing will be used to ensure that the company implements this policy and has the correct health & safety organisation, systems and practices to achieve the correct results. Internal auditing of the safety management system will be conducted at least annually. The auditing process will be supported by a series of planned inspections.

An audit is far more detailed than an inspection, instead of looking at work area based hazards, the audit looks at policies, paperwork and procedures. The audit usually involves examining records to see they are up to date and valid. Records examined may include

accident reports, training records, fire policy and safety policy. These will normally be completed by the Engineering Manager using a template form but more detailed audits may also be completed by external.

An approved occupational health services is used to ensure that employees are fit to work in a food environment they will be provided with health surveillance, this includes the completion of a health questionnaire, respiratory questionnaires, lung function tests and skin tests.

In some cases audits by clients or by external auditors for BRC accreditation or ethical audits may also assess some aspects of health and safety management, in particular those which may impact on food safety and hygiene standards.

Information Sources

OHSAS 18001 Checking and corrective action
HSG65 Successful Health and Safety Management

29. SAFETY SIGNS - Health & Safety (Safety Signs & Signals) Regulations 1996

These regulations have been re-drafted to ensure consistency throughout Europe. They cover a whole range of signs: illuminated, acoustic signals, marking of pipe work, as well as the more traditional safety signs.

Employees will be informed of the meanings of the various signage they may encounter in the workplace.

Wherever there is a risk that cannot be avoided or controlled, a safety sign should be displayed. There are four main categories of signs: warning, prohibitive, mandatory and safe condition.

All signs should be clear and unambiguous with the emphasis being on the use of pictograms instead of words.

Prohibition Signs - Do not

- a. Round shape
- b. Black pictogram on white background, red edging and diagonal line.
e.g. No Smoking, No Naked Flames



Warning Signs - Hazard Present

- a. Triangular shape
- b. Black pictogram on yellow background
e.g. Toxic Material, Flammable



Mandatory - Must be obeyed

- a. Round shape
- b. White pictogram on blue background
e.g. Eye Protection Must Be Worn



Safe Condition

- a. Rectangular or square
- b. White pictogram on green background
e.g. Fire exit, First Aid



New Chemical Symbols (As from 2010 both chemical symbols will be in use until 2015)

GHS Pictograms and Hazard Classes		
<p>pic 1803</p>  <p>Oxidizers</p>	<p>pic 1802</p>  <p>Flammables Self Reactives Pyrophorics Self-Heating Emits Flammable Gas Organic Peroxides</p>	<p>pic 1801</p>  <p>Explosives Self Reactives Organic Peroxides</p>
<p>pic 1809</p>  <p>Acute Toxicity (severe)</p>	<p>pic 1808</p>  <p>Corrosives</p>	<p>pic 1804</p>  <p>Gases Under Pressure</p>
<p>pic 1807</p>  <p>Carcinogen Respiratory Sensitizer Reproductive Toxicity Target Organ Toxicity Mutagenicity Aspiration Toxicity</p>	<p>pic 1806</p>  <p>Environmental Toxicity</p>	<p>pic 1805</p>  <p>Irritant Dermal Sensitizer Acute Toxicity (harmful) Narcotic Effects Respiratory Tract Irritation</p>

30. STRESS

Phoenix Foods Ltd recognise that we have a duty of care to prevent, as far as reasonably practical, ill health due to physical and psychological causes present in the work place. Stress is the adverse reaction people have to excessive pressure or other types of demands placed on them. A controllable level of pressure is healthy and leads to improved motivation, job satisfaction and performance. In contrast excessive pressure can lead over a period of time to ill health such as heart disease, anxiety and depression.

Our aim is to provide a working environment in which no individual suffers unduly from stress.

The Health & Safety Executive definition of stress is:

"The adverse reaction people have to excessive pressure or other types of demand placed on them"

The company will monitor sickness and absence records for indications of excessive stress. Back to work interviews may be used as part of the assessment process

The company will use Risk Assessment in order to monitor for work related stress the following factors will be considered:

- **Demands** – such as workload, work patterns and the work environment.
- **Control** – such as how much say the person has in the way they do their work.
- **Support** – such as the encouragement, sponsorship and resources provided by the organisation, line management and colleagues.
- **Relationships** – such as promoting positive working to avoid conflict and dealing with unacceptable behaviour.
- **Role** – such as whether people understand their role within the organisation and whether the organization ensures that they do not have conflicting roles.
- **Change** – such as how organisational change (large or small) is managed and communicated in the organisation.

If employees report that work demands are effecting their health report this issue to their line manager or the Engineering Manager.

31. TRAINING AND INDUCTION

All new employees will be given training and information to enable them to carry out their duties safely. This will include:-

- Fire procedures
- First aid arrangements
- Wet floor safety
- Their safety responsibilities
- How to report safety issues and hazards along with emergency and normal contact telephone numbers
- Basic manual handling techniques
- Safe use and disposal of chemicals
- Safe use of each production machine, including setting up and cleaning
- Accident reporting – including the location of the accident forms
- An overview of the Health & Safety Policy

They will also be given a copy of the staff handbook.

The induction programme will be completed as part of their induction training. Additionally information on fault reporting and basic safety standards will be provided.

Where required additional training will be provided to employees to ensure they are competent to complete the range of tasks required. This may include training for fire marshalls, use of the pressure maser, manual handling, driving fork lift trucks, pallet loaders or work at height.

32. TRAFFIC MANAGEMENT

Accidents can occur when two vehicles collide but the main concern is avoiding contact between pedestrians and vehicles, these account for hundreds of fatalities every year. All persons who operate vehicles in the workplace must be medically fit and trained in the safe operation of the vehicles they will be using. The vehicles must also be maintained in a safe condition with regular checks being carried out by the operator and a competent service engineer. In addition, there may also be a statutory requirement for the vehicle to be examined by a competent person to certify that it is free from defects.

- Vehicular traffic routes will be clearly defined (marked out)
- All vehicle and pedestrian routes will be kept in good condition and well lit.
- Speed restrictions will be in place – shown by signs
- Direction and instruction signs will be placed at the site entrance
- Risk assessments will be undertaken to cover all transport activities on site.

The premature departure of vehicles from loading areas can cause serious accidents if the vehicle is still being loaded. To reduce the likelihood of this occurring action should be taken such as:

- removing the keys from the driver and keeping them in a secure place until a supervisor has checked that unloading or loading has finished;
- the use of marshalling personnel.
- drivers will be informed of the procedures in place and instructed to ensure that both the vehicle and trailer brakes are applied.

Falls from vehicles

Working from vehicles should be treated as though people are working at height and so appropriate precautions will include:

- devising safe systems of work to avoid the need to climb onto vehicles;
- providing suitable footwear;
- training and instructing employees;
- providing suitable access arrangements to the vehicle;

Further information: HSE HSG136 Workplace Transport

33. VISITORS AND CONTRACTORS

Phoenix Foods policy is to ensure that our activities do not have an adverse effect on those not in our employment, this includes visitors, contractors and our neighbours.

Occasional contractors and visitors will be made aware of emergency procedures and any necessary safety rules whilst they visit our premises.

All visitors to the site must have a named contact within the company. They are required to sign in at reception and be accompanied into the operational areas.

It is the responsibility of the named contact to supervise and pass on any relevant emergency and safety information to their visitor. In particular, the emergency escape routes, evacuation procedure and first aid provision must be explained.

Relevant information is displayed in the reception area and will be brought to the attention of visitors as they sign in.

In the case of contractors carrying out identified significantly hazardous activities, the permit to work process shall be used.

34. WORK AT HEIGHT - HIGH LEVEL WORK

Work at height should never be considered as being incidental to the actual job to be undertaken. Thus for all activities involving work at height a risk assessment will be conducted and the findings recorded. This assessment will consider both the work to be done and the most appropriate access equipment to be used (not just what is available on site) to achieve a safe system of work. In addition a checklist is included in this policy to ensure employees consider all the risk and select appropriate safest option when it is essential that they work at height.

The company has a platform which is designed to be used with one of the fork lift trucks to provide a safe working platform. Only trained employees will drive the fork lift truck when the platform is used. The platform may be used to raise employees or contractors but whichever the driver will always be a member of Phoenix Foods.

There is a scissor lift/mobile elevated working platform on site but currently no employee has been trained to use it so it is only used by external contractors who have received the appropriate training and can demonstrate they have an up to date relevant license to use this piece of equipment.

There is a simple hierarchy of controls for work at height as follows:

- a) avoid the risk by not working at height, for example by working from existing platforms, using long reach equipment etc. If it is not practicable to do the work safely in some other way then:
- b) use work equipment or other measures to prevent falls; and
- c) where the risk of a fall cannot be eliminated further controls to minimise the distance and consequences of a fall should one occur.

SELECTING EQUIPMENT

In selecting appropriate equipment for working at height priority should always be given to collective protective measures to prevent falls (e.g. guardrails and working platforms) before other personal measures. (e.g. fall arrest equipment)

Access equipment should be selected appropriate to the nature of the work being undertaken, taking account of such factors as:

- working conditions;
- duration and frequency of use;
- complexity of work;
- distance and consequences of a fall.

Ladders and stepladders should be used only for light duty, short duration work which has been approved by the establishments nominated person.

For example whilst a ladder may reach the workplace, if the task requires strenuous work, carrying bulky / heavy equipment or likely to take > 30 mins then an alternative means of access such as a tower scaffold or podium steps would be more appropriate.

Equipment for work at height, should be inspected prior to use and by a competent person regularly.

Where work equipment is hired to the user, it is important that both parties agree, in writing, exactly what inspection has been carried out and that this information is passed to those working at height.

In the case of tower scaffolds a competent person must inspect these prior to its first use and thereafter every 7 days that it remains in place.

Ladders

Ladders should be avoided where possible. Ensure that no work is carried out at height if it is safe and reasonably practicable to carry out the work, using an alternative method other than at height.

- The ladder needs to be strong enough for the job and in good condition.
- Do not carry out external work if the weather conditions endanger health or safety.
- Never step up onto a structure or down onto a ladder. Always have the ladder at least three rungs above the height of a structure so as to step down from the ladder onto a structure and step onto a ladder from of a structure.
- Do not carry out make shift repairs to a damaged ladder, remove it from used and label ladder unfit.
- Do not paint or use painted ladders as paint can hide faults.
- Angle the ladder so as to minimise the risk of slipping outwards.
- The top of the ladder should rest against a solid surface and the feet on a firm footing.
- If the ladder is more than three metres long, or used as a way to and from a workplace, it must be suitably fixed at the top to the building structure or erection. If the ladder cannot be fixed, a second person is required to stabilise (foot) the ladder while it is being used. This person must not stand with both feet on the ladder. This will also apply whilst the ladder is being fixed and unfixd.
- Make sure that work can be reached without stretching and that a good hand hold is available.
- Light tools must be carried in a shoulder bag or holster attached to a belt so that both hands are always free when climbing.
- For heavier equipment use lifting gear.
- Always secure the immediate working area from other persons.
- Ladders must be kept in good condition. They should be replaced if the stiles are split or if any rungs are missing or damaged.
- Ladders should be used at an angle of 75° or 1 in 4 angle on a firm, level base.
- The ladder should be secured to a firm surface.
- All ladders will checked prior to use and have a formal six monthly inspection.
- We all need to use ladders or steps at sometime or another. Using ladders or steps could lead to serious accidents if simple safety precautions are not taken.

To minimise the risk, the following precautions should be taken:

- Inspect ladders and steps for any damage and defects before use.
- Do not paint wooden ladders.
- Ensure rungs of ladders and steps are in good condition, clean and free from dirt.
- Ensure the base is firm and level.

- Ensure that ladders are at a safe angle 1 in 4 or 70° (1' horizontal for every 4' vertical).
- Never overreach. Move the ladder or steps instead!
- Never overload the equipment.

Step Ladders

- Avoid any side load on step-ladders as they are easily overturned and avoid over reaching.
- Do not use the top step to work from unless it has specially designed hand holds.
- Never place a step ladder on a platform e.g. workbench or desk to gain extra height.
- Always secure the immediate working area from other persons.

Lifting Plant and Equipment

Most hoists, winches, pulley blocks, chains, ropes and lifting equipment, etc. require periodic test and examination, records of the inspections need to be kept so as to comply with the Lifting Operations and Lifting Equipment Regulations (records of test and examinations).

Consider

- What is to be lifted?
- The weight to be lifted.
- Its centre of gravity.
- How to attach it to the lifting equipment.
- Who is in control of the lift?
- The safe limits of the equipment.
- Practice lifts if necessary.
- Always secure the immediate working area from other persons.

Also

- Never use unsuitable or damaged equipment, badly worn chains shortened with knots, chinked or twisted wire ropes, frayed or rotted fibre ropes.
- Never exceed the safe working load of equipment. Remember that the load in the legs of a sling increases as the angle between the leg increases.
- Do not lift a load if you doubt its weight or adequacy of the equipment.
- Before lifting an unbalanced load, find out its centre of gravity, raise it a few inches off the ground and pause – there will be limited harm if it drops.
- Use packing to prevent sharp edges of the load from damaging slings, do not allow tackle to be damaged by being dropped, dragged from under loads or subjected to sudden loads.
- When using jib cranes, make sure the load radius indicator and or automatic safe load indicator is correctly set, both for the job to be carried out and the set up of the crane.
- Outriggers should be used where necessary.
- When using multi slings make sure the sling angle is taken into account.
- Nominate a responsible slingman or banksman and use a recognised signalling system. Do not rely on vocal contact or assumption.

Information:

See “Form 13” Work at Height checklist

35. WORK EQUIPMENT

Work equipment is defined as any tool, device or apparatus which functions as a whole and is used by employees at work. It covers a wide range of equipment literally from chairs and tables to mechanical and electrical equipment. The requirements of the work equipment regulations overlap with several other sets of regulations, as each set is looking at a different aspect of safety.

E.G: PUWE Regs (all equipment)
 Electricity At Work Regs (electrical aspects)
 Pressure Systems Regs (pressure, heat and steam issues)
 COSHH Regs (chemical and biological aspects)

PUWER set basic minimum standards for all equipment but there scope is wide and not all requirements will apply to every piece of equipment.

To ensure equipment standards are met, any risks associated with the use of equipment will be considered in the general risk assessment completed for activities. This will consider not only the equipment but where it is used and by whom. It should establish the action required to meet the legal requirements and prevent accidents.

The company will:-

- Determine the characteristics that are required to do the job.
- Select the right equipment that is needed for the job
- Ensure the selected equipment meets all current safety regulation
- Select a safe area in which to site and operate the equipment
- Carry out a Risk Assessment to determine any other safety requirements.
- Determine the safe operating procedure for the equipment
- Train the operators and supervisors in the use of the Equipment
- Train the maintainers in the equipment
- Determine Maintenance, Calibration and Inspection criteria for the equipment, implement this and keep records
- Determine and implement changes when safely when modifying operating parameters or task, or following changes in legislation or legal judgements.

Anyone using any equipment must be trained in its use - what to do and, just as importantly, what not to do. The most basic piece of equipment can cause injury if misused.

There are a variety of different types of work equipment used within Phoenix Foods Ltd, this includes basic tools and equipment used in cleaning processes such as mops, buckets, clothes, and brushes. Equally powered equipment such as grinders, drills, abrasive wheels etc are also used along with a range of production plant. Office related equipment includes computer workstations, photocopiers, printers and shredders.

Employees will be trained and informed of the risks associated with equipment and shown the correct methods of use. Care must be taken particularly where the equipment uses either electricity, gas or air as its power source.

Electrical equipment will be part of a formal maintenance programme but employees MUST check these appliances each time they are used to ensure they are showing no signs of visual defect.

Employees will be informed of the local arrangements for fault reporting and maintenance and must not use any equipment which they feel is in a defective condition.

Employees are not permitted to carry out impromptu repairs to any equipment. All electrical repairs must be carried out by a qualified electrician. All defective or worn hand tools or equipment will be refurbished or replaced.

Equipment must be inspected by the user prior to use, if it shown any sign of defects then it should not be used but reported. Common faults and problems to look out for will be identified during their induction or ad hoc training.

- Employees will be shown how to stop and start equipment correctly and how to stop it in the case of an emergency.
- Employees must never interfere with guards or safety devices.
- Equipment fitted with guards and covers must not be used without those in place.
- Powered equipment must be isolated from its power sources prior to carrying out adjustment, setting or cleaning.

Formal inspections of certain high risk equipment will be completed and recorded this includes:

- Ladders
- Fork lift trucks
- Local exhaust ventilation system
- Ventilated Air Booth
- Production lines
- Compressors

Employees must always keep the work area around any equipment free from clutter and ensure that the PPE provided and suitable work clothing are worn to avoid entanglement.

The Engineering Manager will ensure that any plant/machinery delivered to site is in good order and fitted with any necessary safety devices and guards. Any defects found will be notified immediately to the respective party.

The Engineering Manager will ensure that only authorised and, where appropriate, certificated engineers are permitted to maintain items of plant/machinery. Arrangements are in place to ensure all operators are trained and assessed before using any site production machinery, additional training will be provided on cleaning, hygiene and setting machinery. Records of any training given are kept.

Where any doubt of the competency of an operator exists, their training will be reviewed with the onsite trainer.

Site supervision will not require the operators of any plant/machinery to undertake work for which machines are not intended or designed until specific advice has been obtained from the manufacturer.

Managers and Supervisors are responsible for ensuring that:

- Correct maintenance, inspection and calibration are carried out and recorded.
- Only trained operators use the machine, training and competence evaluation are recorded.
- The machine is correctly used in accordance with the approved operating process.

- Where a risk cannot be eliminated by other means, correct PPE is issued and used.
- Where a machine becomes unserviceable it is precluded from use until returned to a safe operational condition.
- Ensuring any changes in the vicinity of an equipment do not compromise the safety of that equipment.

Operators responsibility

- Operator only uses equipment or equipment type that they have been trained on.
- They have access to and work correctly to the approved safe operating procedures.
- All visible guarding and safety devices are correctly fitted and not overridden, or if adjustable, is set to the correct position for the job in hand.
- PPE issued to protect the operator is correctly worn.
- No unauthorised modifications are carried out to the equipment.
- Reporting any unserviceabilities with the equipment immediately
- No using any unserviceable equipment until put back in service after repair, servicing.
- Daily & weekly pre-use checks where these are in use and he is trained to do them.

Engineers responsibilities

- Where maintenance or repair is required maintainer is trained on the equipment.
- Any available Maintenance documents are complied with.
- Work is only carried out under safe condition; i.e. Lock-Outs, Trip Breaker, fit safety pin, disconnect from power source.
- Where guards or safety devices are removed or overridden for maintenance reasons, a safe process is followed; i.e. by safe distance, temporary guard, etc.
- Where it is not possible to repair an equipment immediately, it is preclude from use, by disablement if possible.
- The record of any equipment is kept up to date with any actions taken and its current status.

36. YOUNG PEOPLE

The new Health & Safety (Young Persons) Regulations cover not only employees under the age of 18 but also those of factory age who may do work experience.

What does the employer need to do to comply?

- Assess the risks to young people before they start work.
- Take into account their inexperience and lack of training.
- Address the issues raised in the risk assessment.
- Provide information to parents of factory age children about the risks and control measures introduced.
- Take into account the risk assessment in deciding if there are any areas where the young person should be prohibited from.

Risk Assessment

This individual assessment will look at the risks to the young persons including:

- the layout of the workplace
- the nature and duration of exposure
- the range of work undertaken
- the range of equipment used
- the extent of health & safety training provided

This assessment should be carried out before the young person starts work.

Restrictions on Young People

The outcome of the risk assessment will determine what action needs to be taken. In most cases, the measures we have in place to protect everyone e.g. no young people in the workshop, will be sufficient.

If a significant risk remains, we must do what is reasonably practicable to control harmful exposure or prevent young people from doing this type of work.

Information

See “Form 7” Young Person’s risk assessment form