



HEALTH AND SAFETY POLICY

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1 INTRODUCTION

Under the *Health and Safety at Work etc. Act 1974* there is a requirement on all companies or organisations employing more than five (5) persons to have a written statement of general Health and Safety Policy.

This Health and Safety Policy must cover all Employees and Contractors, explain the arrangements for carrying out the Policy, be revised as appropriate and explain how the statement and any revisions are brought to the attention of all Employees and Contractors of the Company.

The *Management of Health and Safety at Work Regulations 1999* also require that Risk Assessments be undertaken.

The Risk Assessments are an integral part of the basis of the Policy as they form the basis of Health and Safety arrangements within an organisation.

This document is the general Health and Safety Policy of Petrocom Ltd (the Company) and meets the statutory requirements outlined above.

It is the policy of the Company to ensure that, as far as reasonably practicable, Employees and Contractors are provided with safe and healthy working conditions.

The Company regards Health and Safety as being an important function of management at every level, with responsibility for the observance of safe working practices and good housekeeping standards resting firmly with the Director with Responsibility for Health and Safety, supported by Management and Staff alike.

In co-operation with Management, it should be remembered that every Employee and Contractor also has a legal duty under other Health and Safety Regulations to observe safe standards and practices.

Therefore a safe and healthy working environment can only be maintained with the co-operation of all those who work in it.

For clarification, this Policy is divided into the following sections:

- Statement of Intent.
- Organisation within Petrocom Ltd for carrying out this Policy.
- Arrangements for implementing Health and Safety.
- Arrangements for monitoring and reviewing this Policy.
- Arrangements for specific Health and Safety issues.

2 STATEMENT OF INTENT

From the viewpoint of safety at work, and in fulfilment of the *Health and Safety at Work etc. Act 1974*, the policy of the Company is to safeguard, so far as is reasonably practicable, the Health, Safety and Welfare of all Employees.

This applies in particular to the provision and maintenance of Safe Systems of Work (SSoW) and covers all machinery, equipment and appliances used by Employees.

The Company takes as much care as is reasonably possible to ensure the Health and Safety of other people who may be affected by our activities.

The Company considers that it is essential for this policy to operate satisfactorily and to fulfil this aim it is very important to have the full co-operation of all the Employees of the Company.

Therefore the Company gives every encouragement to its Employees and Contractors to make suggestions and have discussions on any aspect of Health and Safety with the Director with Responsibility for Health and Safety.


It is the firm belief of the Company that, by having a sound attitude to Health and Safety requirements, not only will the well being of the Employees and Contractors be assured but also the Company will ultimately be more efficient and thus more profitable.

The allocation of duties for safety matters and particular arrangements, which are made to implement the Policy, are included in this Policy.

Competent Health and Safety advice is provided by TGF Consultants Ltd.

The Policy will be kept up to date, particularly if the business of the Company changes in nature and size.

To ensure this, the Policy, and the way in which it has operated, will be reviewed as appropriate and at least every year.

DECLARATION	
I acknowledge responsibility for the production and implementation of this General Policy on Health and Safety.	
Signed:	
Name:	LOUISE MORGAN
Position:	DIRECTOR WITH RESPONSIBILITY FOR HEALTH AND SAFETY
Date:	10th September 2008

3 ORGANISATION

Petrocom Ltd is based in The Malthouse, Ormskirk in Lancashire.

The Company is an independent forecourt contractor offering a wide range of services to the petrol forecourt industry. However, the Company specialises in the construction and redevelopment of Petrol Filling Stations (PFS), with services ranging from:

- Tank, pump and pipework removal and installation.
- Gauge installation and repairs.
- Stage II vapour recovery retrofit.
- Grade changes.
- Site decommissioning.
- Civil works including deep excavations.
- Project management.

Petrocom Ltd is controlled by its Director; Louise Morgan.

Louise Morgan is identified as having overall responsibility for Health and Safety and is thus identified as the Director with Responsibility for Health and Safety. Louise Morgan is also identified as the Health and Safety Coordinator.

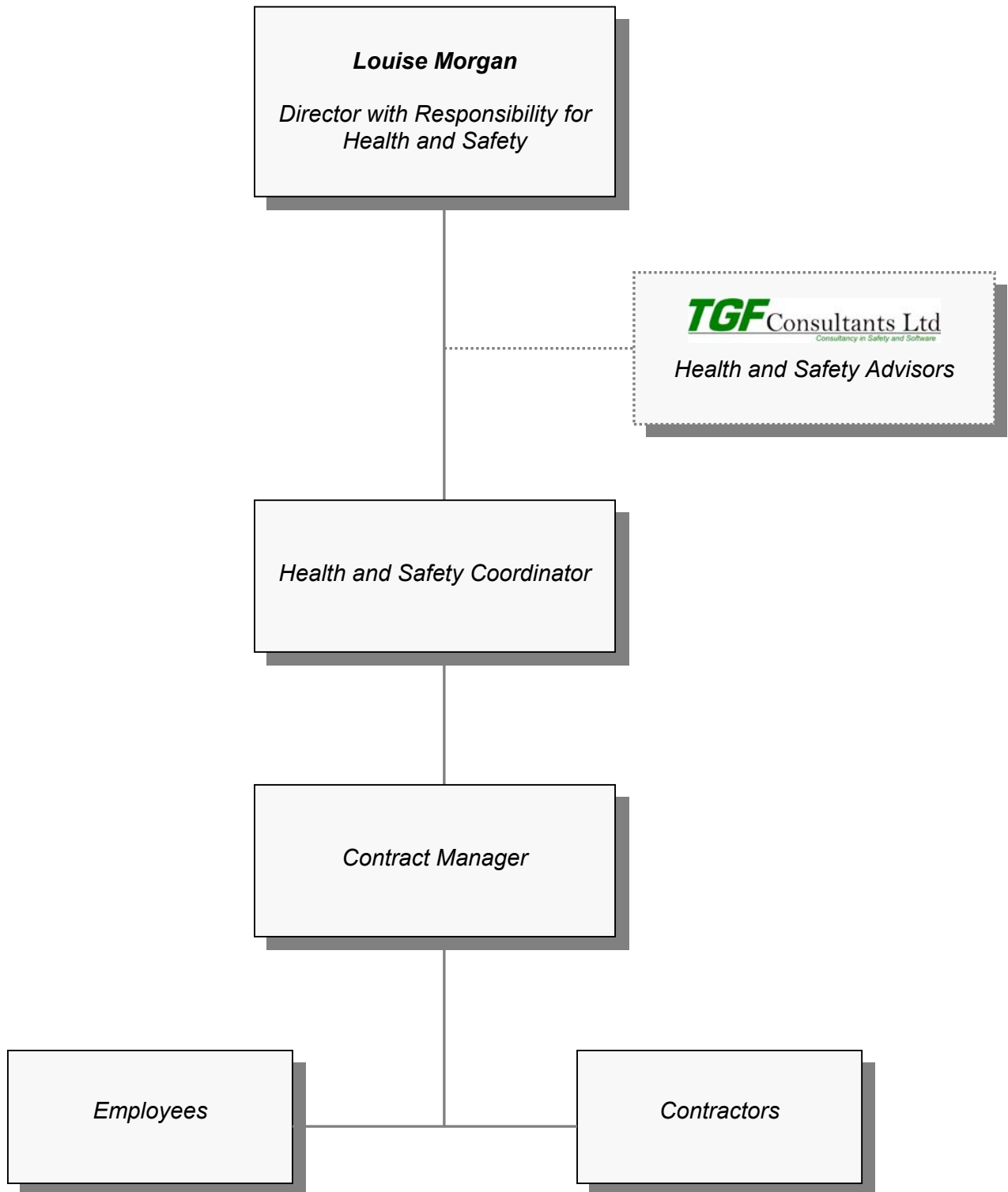
Louise Morgan may delegate some of her Health and Safety duties to the Contract Manager, on a daily basis.

Where and when appropriate, the Contract Manager may delegate some of his Health and Safety duties to a specifically nominated Employee, on a daily basis, as required.

Any other Staff, who do not have specific duties in respect of this Policy, have duties as Employees as laid out in the *Health and Safety at Work etc. Act 1974* and other subordinate Statutory Instruments.

Some of the work undertaken by the Company may be contracted to other firms with which the Company has established and satisfactory relationships.

Contractors to the Company have specific duties as defined in this Health and Safety Policy.



3.1 DUTIES OF THE DIRECTOR WITH RESPONSIBILITY FOR HEALTH AND SAFETY

The Director with Responsibility for Health and Safety will:

- 1) be ultimately responsible for all safety arrangements and ensuring that they are effectively implemented.
- 2) ensure that sufficient resources are made available for duty holders to suitably undertake their Health and Safety duties to comply with legal requirements.
- 3) ensure that arrangements for the Policy are reviewed as often as appropriate, and as a minimum at least once a year.
- 4) ensure that monitoring of the Policy is undertaken as necessary.
- 5) ensure that when amendments are made to the Policy these amendments are circulated to, and signed off by, all Employees.
- 6) ensure that Health and Safety is an agenda that will be suitably discussed at regular Management Meetings.
- 7) ensure that Health and Safety Consultants employed by the Company are given sufficient advice regarding the Company operations and ensure that suitably knowledgeable Employees are allocated to assist in them supplying Health and Safety Services, as required.
- 8) establish a system of Employee Induction into Petrocom Ltd. This will be a process whereby all new Employees will be required to attend an Induction where all relevant Company information and Management Systems will be explained.
- 9) ensure that Employee Contracts of Employment contain information regarding failure to abide by Health and Safety Rules and Regulations, give examples of poor practice and Gross Misconduct and outline the system for discipline where Rules are contravened.
- 10) ensure the arrangement and implementation of a system of discipline for cases where a breach of this Policy occurs or where duties are not undertaken.
- 11) ensure the arrangement of an adequate system of accident reporting and investigation in accordance with the requirements of the *Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995* (RIDDOR '95).

It is also the duty of the Director with Responsibility for Health and Safety to ensure that the Accident Book is fully completed where necessary, including such details as name, date, nature and any additional information that is required.

- 12) ensure that information is given to Employees on general safety topics and any necessary specific information concerned with day-to-day operations.
- 13) ensure that in furtherance of its common law and statutory duties such as the *Employers' Liability (Compulsory Insurance) Act 1969* Company Insurances are kept up to date and prominently displayed so as to be available for inspection at all reasonable times by both Employees and a Health and Safety Inspector.

The Director with Responsibility for Health and Safety will also ensure that, in accordance with the *Employers Liability (Compulsory Insurance) Regulations 1998*, that the level of cover shall in aggregate not be less than £5 million.

- 14) ensure that, when the Company employs Contractors, so far as is reasonably practicable, these Contractors are made aware of, and are subject to, the Health and Safety Policy of the Company.
- 15) ensure the suitability of Contractors by assessing their submitted Health and Safety Policies, Risk Assessments and other Safety Arrangements (such as Method Statements), where relevant.
- 16) ensure that any necessary information, instruction and training for the requirements of Safe Systems of Work (SSoW) are provided.

For example, this includes, where appropriate, any processes concerned with special hazards related to Safe Systems of Work (SSoW), the operation of Work Equipment (WE) or other methods of working.

- 17) be responsible for setting a good personal example and to ensure that when others fail to consider their own well-being and that of others around them that they are counselled and/or disciplined as necessary.
- 18) ensure that suitable and sufficient Risk Assessments are undertaken in compliance with the *Management of Health and Safety at Work Regulations 1999*.

The Director with Responsibility for Health and Safety is also ultimately responsible for ensuring that the results of these are communicated to all Employees.

- 19) when thought appropriate, delegate certain Health and Safety duties to the Health and Safety Coordinator, the Contract Manager or to a specifically identified Employee.

It is also the responsibility of the Director with Responsibility for Health and Safety to ensure that this information is communicated to all relevant persons to ensure that all relevant persons are aware of the duty changes.

- 20) ensure that suitable and sufficient information is given to Employees on general Health and Safety topics.
- 21) ensure that "Suitable" persons, who have received appropriate training and acquired the relevant qualifications, are made available to administer First-Aid.

The Director with Responsibility for Health and Safety will also ensure the provision of 'Appointed Persons' to take charge in an emergency situation (for example summon assistance) if a serious injury or emergency situation develops.

- 22) ensure the provision of suitable and sufficient arrangements for Fire prevention and control during the Company's undertakings.
- 23) ensure that all Emergency arrangements, including First-Aid and Fire, are communicated to all Company Employees.

The Director with Responsibility for Health and Safety will also ensure that all Emergency facilities, such as First-Aid Kits are regularly inspected and maintained.

- 24) ensure that new Employees are asked if they have any particular health needs (in terms of disability or recurring illness) and appropriate arrangements are implemented for this health need if required.

- 25) ensure that Employees do not engage in "horse-play" or dangerous practical jokes.
- 26) ensure the arrangement of a suitable traffic control system during the Company's undertakings to ensure Employee and Public safety.
- 27) ensure that adequate instruction is given for the operation and use of Work Equipment (WE), including any relevant safety apparatus and Personal Protective Equipment (PPE).
- 28) ensure that all Work Equipment (WE), including any relevant safety apparatus and Personal Protective Equipment (PPE) provided is regularly inspected and maintained to ensure that it remains suitable for the purposes for which it was intended.
- 29) ensure that arrangements are implemented to address the requirements of the *Working Time Regulations 1999*.
- 30) comply with the Company "No Smoking" policy.
- 31) observe all Company Health and Safety Rules.

3.2 DUTIES OF EXTERNAL HEALTH AND SAFETY CONSULTANTS

Health and Safety Consultants are employed by the Company on a demand basis to advise on specific Health, Safety and Welfare issues.

When Consultants are used they shall carry appropriate Professional Indemnity (PI) Insurance.

Consultants will liaise with the Director with Responsibility for Health and Safety and upon request will advise to an agreed level.

As part of the consultancy services TGF will remind Petrocom Ltd in good time when issued documentation should be reviewed and updated.

The Consultant services can include:

- 1) advice regarding current UK Health and Safety Legislation.
- 2) assistance in producing, reviewing or updating Company Health and Safety documentation.
- 3) assistance in advising on the legally required notification to the Enforcing Authority following accident or injury, incident or dangerous occurrence.
- 4) assistance in undertaking Health and Safety Inspections and Audits.
- 5) assistance in accident or dangerous occurrence investigation to determine root causes and to prevent recurrence.
- 6) assistance in providing information on request to the Company regarding best practice for Health and Safety Management.

3.3 DUTIES OF THE HEALTH AND SAFETY COORDINATOR

The Health and Safety Coordinator will:

- 1) read and understand the Company's Health and Safety Policy and ensure that its duties and arrangements are being effectively carried out.
- 2) work closely with the Director with Responsibility for Health and Safety in the supervision of safety arrangements during the Company's undertakings.
- 3) ensure that monitoring of this Policy is undertaken and that the Policy is reviewed and updated as often as appropriate (at least annually).
- 4) ensure that Health and Safety Consultants retained by the Company are provided with sufficient advice regarding the Company's operations.
- 5) ensure that all new Employees are inducted into the Company operations and that all relevant Management Systems are explained.
- 6) ensure that Employees are disciplined as appropriate where a breach of this Policy occurs or where recognised duties are not carried out.
- 7) ensure the provision of suitable and sufficient arrangements for First-Aid during the Company's undertakings.
- 8) ensure that suitably trained and qualified First-Aiders are available at all times during Company operations.

The Health and Safety Coordinator will also arrange for appropriate First-Aid cover during holidays, absenteeism, etc.

- 9) ensure 'Appointed Persons' are provided to take charge in an emergency situation (for example summon assistance) if a serious injury or emergency situation develops.

The Health and Safety Coordinator will also arrange for the provision of appropriate cover for 'Appointed Persons' during holidays, absenteeism, etc.

- 10) ensure the provision of suitable and sufficient arrangements for Fire prevention and control during the Company's undertakings.
- 11) ensure that suitably trained and qualified Fire Marshals are available at all times during Company operations.

The Health and Safety Coordinator will also arrange for appropriate Fire Marshal cover during holidays, absenteeism, etc.

- 12) ensure that all Emergency arrangements, including First-Aid and Fire are communicated to all Company Employees.

The Health and Safety Coordinator will also ensure that all Emergency facilities, such as First-Aid Kits are regularly inspected and maintained.

- 13) ensure that relevant Health and Safety information is provided to Employees on general safety topics and any necessary specific information concerned with day-to-day operations.
- 14) ensure that injuries, incidents and any instance of work related disease involving Employees or Contractors, during Company operations is reported immediately to the Director with Responsibility for Health and Safety.

The Health and Safety Coordinator will also ensure that any incident, injury or instance of work related disease involving Employees or Contractors during Company operations is recorded and appropriate action taken where necessary, as required by the *Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995*.

- 15) ensure that all accidents and/or dangerous occurrences are fully investigated to determine their root cause and to prevent a recurrence, so far as is reasonably practicable.
- 16) ensure that the Accident Book is fully completed providing all the relevant details as appropriate.
- 17) ensure that any necessary information and training for the requirements of Safe Systems of Work (SSoW) are provided, as appropriate.

For example, this includes, where appropriate, any processes concerned with special hazards related to Safe Systems of Work (SSoW), the operation of Work Equipment (WE), the use of Hazardous Substances and other methods of working.

- 18) ensure that safety instructions are incorporated into routine orders and that they are obeyed by all Employees and Contractors working on behalf of the Company.
- 19) ensure the arrangement of a suitable traffic control system during the Company's undertakings to ensure Employee and Public safety.
- 20) be responsible for setting a good personal example and to ensure that when others fail to consider their own well being and that of others around them that they are counselled and/or disciplined as necessary.
- 21) ensure that Employees do not engage in "horse-play" or dangerous practical jokes.
- 22) ensure that, when the Company employs Contractors, so far as is reasonably practicable, these Contractors are made aware of, and subject to, the Health and Safety Policy of the Company.
- 23) ensure the suitability of Contractors (in cooperation with the Director with Responsibility for Health and Safety) by assessing their submitted Company information, such as Health and Safety Policies, Risk Assessments, Method Statements, Insurances, qualifications, training, etc.
- 24) delegate, where appropriate, some Health and Safety duties to the Contract Manager or to a specifically identified Employee.

It is also a duty of the Health and Safety Coordinator to ensure that this information is communicated to all relevant persons to ensure that all relevant persons are aware of the duty changes.

- 25) ensure that adequate instruction is given for the operation and use of Work Equipment (WE).
- 26) ensure that all Work Equipment (WE) provided is regularly inspected and maintained to ensure that it remains suitable for the purposes for which it was intended.

- 27) ensure the visual inspection of all Work Equipment (WE) before use to ensure its suitability for the purposes for which it is to be used.
- 28) report to the Director with Responsibility for Health and Safety if any safety equipment has been reported as missing, damaged or faulty as required under the *Personal Protective Equipment at Work Regulations 1992*.
- 29) ensure that new Employees are asked if they have any particular health needs (in terms of disability or recurring illness) and appropriate arrangements are implemented for this health need if required.
- 30) comply with the Company "No Smoking" policy.
- 31) observe all Company Health and Safety Rules.

3.4 DUTIES OF THE CONTRACT MANAGER

The Contract Manager will:

- 1) work closely with the Health and Safety Coordinator and the Director with Responsibility for Health and Safety in the supervision of safety arrangements during the Company's undertakings.
- 2) ensure that any incident, injury or damage involving Employees, Contractors, Client Staff, members of the General Public, etc. are reported immediately to the Health and Safety Coordinator or to the Director with Responsibility for Health and Safety.

Any near misses involving Employees, Contractors, Client Staff, members of the General Public, etc. must also be reported to the Health and Safety Coordinator or to the Director with Responsibility for Health and Safety.

- 3) ensure that all First-Aid arrangements are communicated to all relevant persons (eg: Employees and Contractors).
- 4) ensure that all Fire arrangements are communicated to all relevant persons (eg: Employees and Contractors).
- 5) ensure that safety instructions are incorporated into routine orders and that they are obeyed by all Company Employees and Contractors working on behalf of the Company.
- 6) be responsible for setting a good personal example and to ensure that when others fail to consider their own well being and that of others around them that they are counselled and/or disciplined as necessary.
- 7) ensure that Employees and Contractors do not engage in "horse-play" or dangerous practical jokes.
- 8) ensure that, when the Company employs Contractors, so far as is reasonably practicable, these Contractors are made aware of, and subject to, the Health and Safety Policy of the Company.
- 9) ensure the visual inspection of all Work Equipment (WE) prior to its use to ensure its suitability for the purpose for which it is to be used.
- 10) delegate Health and Safety duties, as required to a specifically identified Employee.

It is also a duty of the Contract Manager to ensure that this information is communicated to all relevant persons to ensure that they are aware of the duty changes.

- 11) ensure that adequate instruction is given for the operation of Work Equipment (WE), including any relevant safety apparatus and protective clothing.
- 12) report to the Health and Safety Coordinator or to the Director with Responsibility for Health and Safety, any safety equipment that has been reported as missing, damaged or faulty, as required under the *Personal Protective Equipment at Work Regulations 1992*.
- 13) comply with the Company "No Smoking" policy.
- 14) observe all Company Health and Safety Rules.

3.5 DUTIES OF EMPLOYEES

Employees of Petrocom Ltd include all personnel not specifically listed in this document.

The Company expects that each of its Employees observe the requirements given under the *Health and Safety at Work etc. Act 1974*.

The Company also understands that no financial charge is to be made on any Employee of the Company to meet any of the requirements of the Health and Safety Policy of the Company, in accordance with the *Health and Safety at Work etc. Act 1974*.

All Employees have a duty to:

- 1) read and understand the Health and Safety Policy and sign, as read and understood the Declarations Register contained in Appendix B of this Health and Safety Policy.
- 2) avoid injury to themselves, or to others, whilst undertaking their work activities.
- 3) cooperate with the Company policy in meeting any statutory safety requirements.
- 4) report immediately to the Contract Manager, the Health and Safety Coordinator or to the Director with Responsibility for Health and Safety, any injury or damage involving Employees or Contractors during Company operations.
- 5) make suggestions whereby the safety of current working arrangements could be improved and to suggest ways of eliminating hazards.
- 6) ensure that workplaces are kept tidy and any debris, waste materials, etc. is cleared as work proceeds.
- 7) not interfere with, or misuse or abuse anything provided to protect their Health, Safety and Welfare that is in compliance with the *Health and Safety at Work etc. Act 1974*.
- 8) comply with any mandatory or information signs/posters erected during the Company's undertakings.
- 9) ensure that all tools, materials and Work Equipment (WE) are used correctly and to keep such tools, materials and Work Equipment (WE) in good condition.
- 10) be aware that only suitably trained and, where relevant, certified Employees are allowed to operate Work Equipment (WE).
- 11) use all relevant safety apparatus and to wear any Personal Protective Equipment (PPE) provided for their use, when required by particular tasks.

The Company ensures that, when required, adequate instruction is given for the use of these items.

- 12) not engage in "horse-play" or dangerous practical jokes.
- 13) when using PPE, to report to the Contract Manager, the Health and Safety Coordinator or to the Director with Responsibility for Health and Safety, if any equipment is missing, damaged or faulty as required under the *Personal Protective Equipment at Work Regulations 1992*.

- 14) comply with the Company "No Smoking" policy.
- 15) observe all Company Health and Safety Rules.

3.6 DUTIES OF CONTRACTORS

Health and Safety Information is passed to, and received from, Contractors.

Contractors should note that the requirements given below form the basis of the Safety Rules for Petrocom Ltd Contractors.

All Contractors have a duty to:

- 1) comply with the Petrocom Ltd Policy on Health and Safety and, where appropriate, ensure their own Company Policy and Arrangements are made available.
- 2) provide Method Statements and relevant Risk Assessments when carrying out high-risk activities (eg: working at height).

Method Statements must be agreed with the Petrocom Ltd Health and Safety Coordinator or with the Director with Responsibility for Health and Safety before work begins and copies of Method Statements and Risk Assessments must be made available so that compliance with the agreed Method Statement can be monitored.

- 3) ensure that any Work Equipment (WE) used by Contractors Employees is competently inspected to ensure that it is maintained in accordance with the *Provision and Use of Work Equipment (WE) Regulations 1998*.
- 4) ensure that their Employees do not alter anything provided for their use or interfere with any Work Equipment (WE), unless authorised by the Contract Manager, the Health and Safety Coordinator or by the Director with Responsibility for Health and Safety.
- 5) ensure that all Work Equipment (WE) is safe and in good working condition, fitted with any necessary guards and safety devices and with any necessary certificates available for inspection.
- 6) ensure that power tools or electrical equipment, such as transformers, generators, extension leads, plugs and sockets, are suitable for their proposed use and are maintained in a good state of repair.
- 7) report immediately to the Petrocom Ltd Contract Manager, Health and Safety Coordinator or to the Director with Responsibility for Health and Safety, any injury or damage involving its Employees or other Contractors during its undertakings. Any near misses must also be reported in the same way.
- 8) ensure that their Employees obey any safety instructions given by Petrocom Ltd.
- 9) ensure that any material or substance, which has health, fire or explosion risks is used and stored in accordance with relevant Regulations and current recommendations.
- 10) ensure that relevant safety information is provided to any other persons who may be affected during the undertakings of Petrocom Ltd.
- 11) ensure assessment of risk associated with any substances or processes hazardous to health, which are to be used during the undertakings of Petrocom Ltd, is provided to the Petrocom Ltd Contract Manager, Health and Safety Coordinator or to the Director with Responsibility for Health and Safety.
- 12) ensure that workplaces are kept tidy and any debris, waste materials, etc. is cleared as work proceeds.

- 13) ensure that appropriate Personal Protective Equipment (PPE) is worn, when required by particular tasks.
- 14) comply with any mandatory or information signs/posters erected during the undertakings of Petrocom Ltd.
- 15) notify the Petrocom Ltd Contract Manager, Health and Safety Coordinator or the Director with Responsibility for Health and Safety of their presence prior to commencing work.
- 16) ensure that all work carried out is in accordance with current relevant statutory provisions, and also to take into account the safety of those persons present during Petrocom Ltd operations, including the General Public.
- 17) comply with the Petrocom Ltd "No Smoking" policy.
- 18) observe all Petrocom Ltd Health and Safety Rules.

4 ARRANGEMENTS

Detailed in this section are the general arrangements that have been put in place to control Health and Safety in the Company, based on the risks identified in the Risk Assessment and any other requirements from current Legislation.

The arrangements are communicated to all Employees (*Management of Health and Safety at Work Regulations 1999*) and any necessary additional information or training that has been identified is also provided.

4.1 ACCESS AND WORKING AT HEIGHT

In accordance with the requirements of the *Work at Height Regulations 2005*, when undertaking work that requires access to be undertaken at height, Petrocom Ltd will ensure that a Safe System of Work (SSoW) is established.

The Health and Safety Executive (HSE) defines work at height as:

"If measures required by these Regulations (Work at Height Regulations 2005) were not taken, a person could fall a distance liable to cause personal injury."

The risks associated with working at height will be assessed taking into consideration:

- The time and duration of the work.
- The height at which work is to be undertaken.
- Hazards associated with falling objects and fragile materials.
- Local restrictions (eg: display systems, adjacent buildings, etc.).
- Choice of access equipment (eg: Mobile Elevating Working Platforms (MEWPs), Scaffolding, etc.).
- Ground conditions, weather and other environmental considerations (as required).
- Training and experience.
- Requirements for additional safety equipment (as required).
- Other work being undertaken in the vicinity.
- Contracting out the work.

After access equipment choices have been substantiated and all those required to work at heights will be informed of their Health and Safety duties and requirements.

Where required, a specific Risk Assessment and Method Statement for the operations will be produced.

4.2 ACCIDENT & INCIDENT REPORTING

4.2.1 Recording Accidents

All accidents are recorded, including those requiring only local First-Aid treatment, in the Accident Book Form BI 510 (as required by the *Social Security (Claims and Payments) Regulations 1979*, the *Social Security Administration Act 1992* and the *Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995*).

The Accident Book requires the entry to be held confidentially so as to enable compliance with the *Data Protection Act 1998*.

Incidents (such as Near Misses) are investigated and the lessons to be learnt are fed back to the relevant persons.

4.2.2 Reporting Accidents, Incidents & Diseases

In the unlikely event of a Reportable Injury or Occurrence or a person contracting a reportable work-related disease, the Company will notify the "Enforcing Authority" without delay by the quickest practicable means (such as Phone, Fax, E-mail, Website) in accordance with the *Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995*.

In addition to the initial notification the Company will forward a report on the approved form F2508 (accidents/incidents) or F2508A (diseases) as appropriate within ten (10) days of the accident or incident occurring or of the person being diagnosed as suffering from a reportable work related disease to the "Enforcing Authority".

The records include the date and place of the accident, the time and the name of the injured person.

The Director with Responsibility for Health and Safety will ensure that all incidents are fully investigated and that detailed accounts of the incident and of the resulting investigation are prepared.

The procedure to be adopted in reporting a death, or injury resulting from an accident, an industrial disease or a dangerous occurrence is contained in the *Reporting of Injuries, Dangerous Diseases and Occurrences Regulations 1995*.

Information regarding Accident and Incident arrangements is given in "Appendix A - Specific Health and Safety Information".

4.3 ASBESTOS AND ASBESTOS CONTAINING MATERIAL (ACM)

During the Company's undertakings, Employees may come into contact with Asbestos and Asbestos Containing Material (ACM).

Petrocom Ltd takes all necessary precautions to ensure that exposure to Asbestos and ACM is reduced so far as is reasonably practicable.

This can include a request for Occupiers/Owners of premises to provide the details of the Asbestos Survey for the building (as required by the *Control of Asbestos Regulations 2006*).

If there is suspected material on the premises that may cause Employees and others to come into contact with Asbestos and/or ACM, the Company ensures that no Employees work in affected areas until a sufficient Asbestos Survey is arranged and undertaken in conjunction with the latest guidance provided by the Health and Safety Commission (HSC) and the HSE with respect to the *Control of Asbestos Regulations 2006*.

The Survey will then be used to formulate a Safe Working Procedure to allow the work to be undertaken.

This may be after a licensed Asbestos Waste Contractor is contracted to safely remove any identified Asbestos and/or ACM and also to ensure its safe disposal.

4.4 BIOLOGICAL HAZARDS

Petrocom Ltd will ensure that risks from identified Biological Hazards are assessed and effective control measures put in place. The risks include those from Leptospirosis (Weil's Disease), HIV/AIDS, Hepatitis (A, B, C), Legionella, Toxicara, etc.

Legionellosis (including Legionnaires' Disease) is a potential form of pneumonia that is caused by the bacterium *Legionella pneumophila* (and related bacteria). Infection usually occurs through inhalation of the bacteria through tiny droplets of contaminated water.

The Company recognises its duty to ensure the Health, Safety and Welfare of its Employees and others in accordance with the *Health and Safety at Work etc. Act 1974* and the *Control of Substances Hazardous to Health Regulations 2002 (COSHH)*.

The Company use the Approved Code of Practice (ACoP) and Guidance *Legionnaires' Disease - The Control of Legionella Bacteria in Water Systems* in order to control the risks from water systems (such as air-conditioning systems).

Risks presented from all biological hazards will be controlled via the implementation of Safe Systems of Work (SSoW) and the reporting of any suspected exposures and on-coming symptoms of ill health.

4.5 COMMUNICATION

It is a requirement of the *Health and Safety at Work etc. Act 1974* and the *Management of Health and Safety at Work Regulations 1999* that Employers undertake such communication with the workforce so as to enable the promotion and development of Health and Safety in the workplace and also to monitor its effectiveness.

In addition, the *Health and Safety Information for Employees Regulations 1989* requires Employers to provide Health, Safety and Welfare information in the form of an Approved Poster or an Approved Leaflet.

Also the *Health and Safety (Consultation with Employees) Regulations 1996* requires Employers in the situation where there are Employees, who are not already represented by Safety Representatives under the *Safety Representatives and Safety Committees Regulations 1977*, to consult with those Employees on matters of Health and Safety.

4.6 COMPANY INSURANCES

Petrocom Ltd will ensure that all necessary Insurances are provided and where required, displayed for appropriate examination by Employees and a Health and Safety Inspector.

In particular the Company will provide cover under the requirements of the *Employers' Liability (Compulsory Insurance) Act 1969* and the *Employers' Liability (Compulsory Insurance) Regulations 1998* to a value of not less than £5 Million.

Other Insurances provided can include, but may not be limited to:

- Contents.
- Employers Liability.
- Public Indemnity.
- Vehicles.

4.7 CONSTRUCTION DESIGN AND MANAGEMENT (CDM)

The *Construction (Design and Management) Regulations 2007* replace the *Construction (Design and Management) Regulations 1994* and the *Construction (Health, Safety and Welfare) Regulations 1996*.

The aim of the *Construction (Design and Management) Regulations 2007* is to integrate Health and Safety into the management of construction projects and to encourage **everyone** involved to work together.

The Health and Safety Executive (HSE) define "construction work" as:

"The installation, commissioning, maintenance, repair, or removal of mechanical, electrical, gas, compressed air, hydraulic, telecommunications, computer or similar services which are normally fixed within or to a structure".

4.7.1 Contractors Duties

The Company may undertake work on a project that attracts the requirements of the *Construction (Design and Management) Regulations 2007*.

The Company's involvement with CDM may result in them acting in the role of Contractor.

When this situation arises the Company shall plan, manage and monitor the Construction Phase in a way which ensures that, so far as is reasonably practicable, it is carried out without risk to Health and Safety.

The main points of the Contractor's role are as follows:

- Arrange for each worker carrying out work under his control to be provided with information and training to ensure, so far as is reasonably practicable that the work is carried out safely and without risk to health, including:
 - Site induction training (where this has not been provided by the Principal Contractor).

- Information on the risks to their Health and Safety identified in Risk Assessments.
- Measures identified in Risk Assessments to control risk.
- Appropriate Site Rules.
- Procedures to be followed in the event of serious and imminent danger and the names of those persons charged with implementing those procedures.
- Ensure reasonable steps have been taken to prevent access to site by unauthorised persons.
- Ensure, so far as is reasonably practicable, that suitable Welfare Facilities are provided, including, but not limited to:
 - Sanitary conveniences.
 - Washing facilities.
 - Drinking water.
 - Changing rooms and lockers.
 - Rest facilities.

Where a project is notifiable, as a Contractor the Company shall not carry out any work in relation to the project until the Company:

- Has been provided with the names of the CDM Coordinator and the Principal Contractor.
- Has been given access to such part of the Construction Phase Plan relevant to the work to be undertaken.
- Are satisfied that the Health and Safety Executive (HSE) has been notified of the project.

The Company shall also ensure that the Principal Contractor is promptly provided with any information which:

- Might affect the Health and Safety of any person working on the project or affected by it.
- Might justify a review of the Construction Phase Plan.
- Has been identified for inclusion in the Health and Safety File.

In addition to this the Company will promptly identify to the Principal Contractor any Contractor whom he appoints or engages.

The Company will comply with:

- Any reasonable directions issued to them by the Principal Contractor.
- Any Site Rules.

The Company will promptly provide the Principal Contractor with the information in relation to any death, injury, condition or dangerous occurrence.

Finally, all reasonable steps will be taken by the Company to ensure:

- Their operations are carried out in accordance with the Construction Phase Plan.
- Appropriate action is taken to ensure Health and Safety remains constant where it is not possible to fully comply with the Construction Phase Plan in any particular case.
- The Principal Contractor is notified of any significant finding which requires the Construction Phase Plan to be altered or added to.

4.7.2 Principal Contractors Duties

The Company may undertake work on a project that attracts the requirements of the *Construction (Design and Management) Regulations 2007*.

The Company's involvement with CDM may result in them acting in the role of Principal Contractor.

When this situation arises the Company shall plan, manage and monitor the Construction Phase in a way which ensures that, so far as is reasonably practicable, it is carried out without risk to Health and Safety.

In practice this entails ensuring co-operation and co-ordination of activities between those persons concerned with the project and the application of risk prevention.

The main points of the Principal Contractor's role are as follows:

- Prepare a Construction Phase Plan prior to the start of the Construction Phase of the project.

The Plan shall be sufficient so as to ensure the effective planning, management and monitoring of the project in a way which, so far as is reasonably practicable prevents the risk to Health or Safety.

- Ensure that the particulars required to be in the notice submitted by the CDM Coordinator to the Health and Safety Executive (HSE) are displayed in a readable condition in a position where it can be read.
- Liaise with the CDM Coordinator (*formerly the Planning Supervisor*) in relation to any design or change to any design.
- Ensure, so far as is reasonably practicable, that suitable Welfare Facilities are provided, including, but not limited to:
 - Sanitary conveniences.
 - Washing facilities.

- Drinking water.
- Changing rooms and lockers.
- Rest facilities.
- Establish and implement appropriate Site Rules.
- Ensure that every Contractor is presented with, before he begins work, sufficient information to enable him to properly plan for his work.
- Arrange for the provision of suitable Site Induction Training for all workers and for any further information and training as may be required.

4.8 CONTRACTOR SELECTION

Petrocom Ltd uses Contractors as part of normal operations.

Where this occurs, Contractors will be selected by assessing each Contractor's submitted items, including:

- Health and Safety Policy.
- Risk Assessments.
- Method Statements.
- Training and Experience.
- Insurances (Employer's Liability, Public Liability, etc.).
- Prosecutions/Accident Records.

This process helps to ensure that all Contractors working for the Company are competent and have made adequate provision for Health and Safety within their own discipline.

For any Contractors' Work Equipment (WE), safe procedures for use and maintenance will be followed to meet the requirements of the *Provision and Use of Work Equipment Regulations 1998*.

4.9 DISPLAY SCREEN EQUIPMENT (DSE)

The Company undertakes suitable assessments of workstations that are used at the Company's Malthouse premises.

Those Employees classed as "Users" are identified and the control measures required to reduce, so far as is reasonably practicable, the health and safety risks to those "Users" are also identified.

In the event of a change in workstation layout, or upgrading of equipment for example, reassessments or reviews are undertaken in accordance with the *Health and Safety (Display Screen Equipment) Regulations 1992*.

4.10 ELECTRICAL EQUIPMENT

All portable electrical equipment and wiring used during Petrocom Ltd undertakings is inspected on a regular basis and has relevant certification available for inspection where appropriate.

Should an Electrical Contractor be employed to work on behalf of Petrocom Ltd, they will be qualified, as a minimum to BS7671 (Institute of Electrical Engineers (IEE) Wiring Regulations).

Regular inspections are undertaken and recorded in accordance with the *Electricity at Work Regulations 1989*.

The Company ensures the effective isolation of electrical equipment, which means that equipment reconnection, is prevented. For example, this equipment can be a Residual Current Device (RCD) on the main electrical supply panel on site.

4.11 ELECTRICAL INSTALLATIONS

The Company will ensure that all Electrical Installations conform to the requirements of *BS 7671:2001 Requirements for Electrical Installations: IEE Wiring Regulations 17th Edition* and the *Electricity at Work Regulations 1989* as well as the *Building Regulations 2000* (Approved Document P).

Providing electrical installations and maintaining them in a safe condition will include the requirements for:

- Ring Circuits.
- Fused plugs and switched sockets.
- Wiring colours.
- Isolation and switching.
- Inspection and testing (formal and periodic inspections).
- Protection against fire.
- Protection against electric shock (eg: earthing, use of Residual Current devices, insulation).
- Protection against overcurrent (eg: fuses, Circuit Breakers, etc.).

4.12 ENVIRONMENTAL CONSIDERATIONS

Petrocom Ltd recognises its duty to the environment in that adverse impacts will be minimised as much as possible.

The Company recognises its duty to fully comply with current UK Environmental Legislation such as the *Environmental Protection Act 1990* and associated Statutory Instruments.

If the Company produces more than 200kg of hazardous waste per year then the Company will register with the Environment Agency (EA). The Company will then ensure that procedures are established to maintain a register of waste.

The Company will also ensure, as required by the *Hazardous Waste Regulations 2005*, pre-notification to the Environment Agency (EA) for individual consignments.

During the Company's undertakings every effort will be made by all concerned to prevent pollutants entering any recognised environmental media (ie: Air, Land and Water).

The Company will also make every reasonable attempt to ensure that Suppliers of tools and materials can demonstrate that resources can be sustainable, renewable and recyclable.

4.13 EMERGENCY ARRANGEMENTS

Petrocom Ltd will establish emergency procedures to prepare for incidents relating to serious and imminent danger, as required by the *Management of Health and Safety at Work Regulations 1999*.

Procedures will be established to ensure an efficient evacuation of the workplace in the event of an emergency.

The Company considers foreseeable workplace emergencies to include:

- Fire and explosion.
- High winds and other abnormal weather conditions such as flooding.
- Uncontrolled release of a Hazardous Substance.
- Structure collapse.
- Outbreak of disease.
- Terrorist or malicious attack or bomb threat.
- Civil disturbance or unrest.

4.14 EQUAL OPPORTUNITIES

Petrocom Ltd operates an Equal Opportunities Policy, meaning that all Staff are selected and treated on the basis of individual merit and will not be discriminated against in any way on the grounds of:

- Sex.
- Marital or parental status.
- Physical handicap.
- Colour.
- Race.
- Ethnic origin or nationality.
- Age.
- Any other reason than ability and attitude to their work.

This Equal Opportunities Policy complies with Legislation such as the *Race Relations Act 1976*, the *Sex Discrimination Act 1975* and the *Disability Discrimination Act 1995*.

It means that peoples' differences will be accepted but also not meaning that any minority group will be given unfair advantages.

Under the *Race Relations Act 1976*, it is unlawful to discriminate against any minority group in the workplace.

If there is evidence to suggest that an individual or a group of individuals is doing so those found to be at fault will face disciplinary action.

The Company will not, in turn, discriminate against any individuals who have pursued a complaint of racial (or other) harassment.

They will not be disciplined, dismissed, transferred (unless requested by the individual) or be subject to any other detriment such as being moved into a lower-status job.

Recruitment and promotion criteria are also reviewed to ensure that assessment is conducted solely on the basis of individual merit and ability appropriate to the position.

The Company ensures that all recruitment advertising is compatible with the spirit and intent of this Policy.

The Company will also ensure that the provisions of the *Disability Discrimination Act 1995* will be complied with.

The Company understands that impairments can be manifest in numerous ways where it may be physical, for instance where a person requires access to the premises in a wheelchair, or it may be where a person has a sight or hearing impairment.

The Company will also ensure that the provisions of the *Employment Equality (Age) Regulations 2006* will be complied with.

4.15 EXCAVATIONS

The Company may undertake excavations as part of the installation of services or footings for structures.

Excavation may be undertaken initially by trial digging and hand digging for smaller requirements or by excavators for larger requirements.

Prior to excavation all areas are investigated to assess the hazards presented. For example, this can include the use of Cable avoidance Tools (CAT) to identify buried underground services, to the consultation of ground surveys and other plans and diagrams to identify contaminating materials, etc.

Suitable control measures are also introduced to ensure that escape can be made from excavations in an emergency as well as protecting the works from pedestrian access and vehicular entry.

Specific measures are introduced to prevent the collapse of excavations and to prevent the ingress of water and procedures are established to inspect the ongoing suitability of excavations prior to entry. When left unattended, excavations are suitably protected to prevent unauthorised entry either by covering or by distance guarding.

4.16 FIRE ARRANGEMENTS

4.16.1 On-Site Operations

Fire risk prevention during the Petrocom on-site operations will follow the requirements of the *Regulatory Reform (Fire Safety) Order (RRO) 2005*, the *Dangerous Substances and Explosive Atmospheres Regulations 2002* and the *Construction (Design and Management) Regulations 2007*.

As appropriate, the Company will ensure (after careful liaison with the Principal Contractor/site controller), provision for:

- The identification of a 'Fire Marshal' (the person who will manage fire precautions and arrangements on-site).
- Prevention of fire, including appropriate flammable storage facilities, regular removal of combustibles, etc.
- Raising the alarm, such as manual bells, klaxons, automatic systems, etc. These must be able to be heard by everyone working on-site over normal background noise, etc.
- Means of Escape, providing persons on-site with at least two Escape Routes in different directions, clearly signed, free from obstruction, etc.
- Emergency Lighting to illuminate Emergency Escape Routes and Exits.
- Emergency Assembly Point(s) where everyone can gather and be accounted for.
- Fire Fighting Equipment (FFE), of the correct type, clearly identifiable, easily accessible, regularly maintained, etc.
- Emergency Plans to ensure that everyone on-site reaches a place of safety as quickly and efficiently as is reasonably practicable.
- Training to safeguard the safety of Employees, Contractors, etc. including the nomination of Fire Marshals, the correct operation of FFE, Fire Drill, etc.

4.16.2 Company Premises (The Malthouse)

Fire fighting, detection and the provision of emergency escape routes and exits are provided and maintained at The Malthouse.

A Fire Risk Assessment (FRA) will be undertaken for the premises and will be recorded and reviewed in accordance with the *Regulatory Reform (Fire Safety) Order (RRO) 2005*.

The Company will ensure the provision for:

- The identification of a 'Responsible Person' (the person who has control of or a degree of control of the premises).
- Prevention of fire, including appropriate flammable storage facilities, regular removal of combustibles, etc.

- Raising the alarm, such as manual bells, klaxons, automatic systems, etc.
- Means of Escape, providing those persons on the premises with an appropriate number of clearly signed Escape Routes which lead to a place of safety, are free from obstruction, are provided with emergency doors which operate in the direction of escape, etc.
- Emergency Lighting to illuminate Emergency Escape Routes and Exits.
- Emergency Assembly Point(s) where everyone can gather and be accounted for.
- Fire Fighting Equipment (FFE), of the correct type, clearly identifiable, easily accessible, regularly maintained, etc.
- Emergency Plans to ensure that everyone on the premises reaches a place of safety as quickly and efficiently as is reasonably practicable.
- Training to safeguard the safety of Employees, Visitors, etc. including the nomination of Fire Marshals, the correct operation of FFE, Fire Drill, etc.

Information regarding Fire Safety is given in "Appendix A - Specific Health and Safety Information".

4.17 FIRST-AID

4.17.1 On-Site Operations

All Employees and any Contractors working on behalf of Petrocom Ltd during the Company's on-site operations are inducted to site, this includes instruction relating to the provision of all on-site First-Aid Arrangements. Such arrangements will generally include the location of the First-Aid post and any persons who are proficient in First-Aid.

People will only be deemed to be proficient in First-Aid if they have received appropriate training and acquired suitable qualifications approved by the Health and Safety Executive (HSE).

The Company may also, in accordance with the *Health and Safety (First-Aid) Regulations 1981*, identify 'Appointed Persons' during on-site operations.

'Appointed Persons' are required to take charge of an emergency situation (for example summon assistance) if a serious injury or emergency situation develops.

It is understood that 'Appointed Persons' should not attempt to give First-Aid for which they have not been trained.

First-Aid kits are provided during the Company's on-site operations and it is a duty of First-Aiders to inspect the contents and replace any items that are missing.

Information regarding First-Aid provisions and responsibility is given in 'Appendix A - Specific Health and Safety Information'.

4.17.2 Company Premises (The Malthouse)

All Employees, Contractors and Visitors to the Company's Malthouse premises are instructed as to the location of the First-Aid post and any Employees who are proficient in First-Aid.

Petrocom Ltd as appointed 'suitable' persons to administer First-Aid should the need arise, as required by the *Health and Safety (First-Aid) Regulations 1981*.

'Suitable' persons are those who have received appropriate training and acquired qualifications approved by the Health and Safety Executive (HSE).

The Company will also ensure that any First-Aid Training required is undertaken by persons or organisations qualified to do so.

In accordance with the *Health and Safety (First-Aid) Regulations 1981*, for typical work undertaken by the Company, and the number of Employees involved, the Company may provide 'Appointed Persons' on the premises.

'Appointed Persons' are required to take charge of an emergency situation (for example summon assistance) if a serious injury or emergency situation develops.

It is understood that 'Appointed Persons' should not attempt to give First Aid for which they have not been trained.

First-Aid kits are provided at the Company's Malthouse premises and it is a duty of First-Aiders to inspect the contents and replace any items that are missing.

Information regarding First-Aid arrangements is given in "Appendix A - Specific Health and Safety Information".

4.18 FITNESS FOR WORK

Petrocom Ltd Employees must ensure that they are fit to undertake the work required of them by the Company. This will mean being not under the influence of illegal drugs or alcohol when expected to work.

If an Employee is receiving medical treatment then the Company must be confidentially informed of the nature of the treatment. This may include divulging information relating to the issue of prescription drugs by a General Medical Practitioner.

The Employee should inform the prescribing medical examiner of the nature of work undertaken for the Company such as operation of machinery and vehicles.

Employees must ensure that fitness is ensured through adequate breaks in between those times working for the Company.

This will involve tiredness incurred as a result of work undertaken outside of Company hours which can affect both quality and safety performance for the individual and hence the Company.

4.19 HAZARDOUS SUBSTANCES (COSHH)

Employees and Contractors may be exposed to Hazardous Substances during operations undertaken by the Company, such as general maintenance operations.

The Company recognises that these substances may present some considerable risks to the Health and Safety of Employees and Contractors.

Materials Safety Data Sheets (MSDS) will be obtained from Suppliers and Contractors carrying out work on behalf of Petrocom Ltd.

The Company will ensure that COSHH Assessments are undertaken in accordance with the *Control of Substances Hazardous to Health Regulations 2002 (COSHH)*.

The Company will ensure that exposure to Hazardous Substances is either prevented or adequately controlled and that suitable Personal Protective Equipment (PPE) is supplied when required where other control measures are not reasonably practicable.

The Company will also ensure that all reasonable steps to reduce the incidence of dust and fumes in the workplace are undertaken.

4.20 HEALTH SURVEILLANCE

Petrocom Ltd will arrange Health Surveillance for Employees where the Company Risk Assessments show that:

- There is an identifiable disease or adverse health condition related to the work being undertaken.
- Valid techniques are available to detect indications of the disease or condition.
- There is a reasonable likelihood that the disease or condition may occur in the particular conditions of work.
- Health Surveillance is likely to further the protection of the Employee's health.

The main aim of Health Surveillance is to detect early indications of a disease or condition to allow the Employer to introduce measures to prevent further harm to the Employee.

4.21 HOT WORK

Petrocom Ltd utilise a Permit To Work (PTW) system to control Hot Work operations on-site such as welding and burning.

Criteria established within the system addresses:

- The measures adopted for housekeeping and combustibles removal.
- The availability of water for cooling surfaces.
- The availability of Fire Fighting Equipment (FFE).
- The measures adopted for personal protection (eg: Welders Mask, Gauntlets, etc.).

- The measures to protect others not directly involved (eg: use of Welding Screens, isolation of areas, etc.).
- The measures to isolate local area fire detection and stopping systems (eg: Heat Detectors, sprinklers, etc.).
- The measures taken to prevent heat conduction and containment of hot material (eg: fire stopping systems, welding blankets, etc.).
- The measures taken to isolate building services (eg: gas and electricity supplies, etc.).
- The measures taken to ensure other activities in adjacent working areas do not create additional hazards (eg: use of flammable substances, etc.).
- The measures taken to ensure area ventilation and respiration protection (eg: natural dilution ventilation, air movers, air-fed respirators, etc.).
- The measures taken to ensure that Gas Cylinders are suitable (eg: have flash-back arrestors, are stored correctly away from working area).
- The measures taken to prevent smoking in working areas.
- The measures taken to ensure area monitoring after Hot Work has been undertaken.

4.22 LANDLORD AND TENANT ARRANGEMENTS

It is important to ascertain the responsibilities for Landlords and Tenants with respect to the requirements for Health and Safety Legislation.

Commercial Tenancy Leases may put the onus for Health and Safety Management on the Tenant. This should be identified in the Terms of the Agreement.

Tenants are typically responsible for internal repairs and maintenance of commercial properties. In some cases this may include external maintenance.

However, full consultation of Agreements and liaison should be undertaken so that all parties are aware of the responsibilities.

4.23 LIFTING EQUIPMENT (LE)

Petrocom Ltd may use lifting Equipment (LE) during normal operations, including:

- Fork Lift Trucks (FLT).
- Excavators.
- Dumper Trucks.
- Mobile Elevating Work Platforms (MEWP).

The Company will ensure that Lifting Equipment (LE) is 'thoroughly examined' by a competent person, at least every twelve (12) months to ensure that it remains safe to use. In the case of LE designed to lift people, such as a MEWP, the Company will ensure that it is 'thoroughly examined' by a competent person, at least every six (6) months.

A 'thorough examination' is a systematic and detailed examination of the LE. Its aim is to detect any defects that are, or might become dangerous.

The Company will also ensure that LE is regularly inspected between 'thorough examinations' and is properly maintained by a competent person and such inspections and maintenance operations are recorded in accordance with the *Lifting Operations and Lifting Equipment Regulations 1998*.

Any training that is required for the operation of such equipment is arranged by the Company.

4.24 LONE WORKING

Petrocom Ltd understands that risks can be exacerbated when Employees are required to work alone as part of their job requirements.

The risks from lone working are identified in the Company Risk Assessments together with the current control measures employed.

The main hazards relate to communication and assistance in case of an emergency. The Company ensures that appropriate measures are taken to facilitate communication, such as use of mobile phones, regular checking-in procedures, etc.

Where high-risk activities are required to be undertaken it may be determined that lone working is unacceptable.

4.25 MANUAL HANDLING

Petrocom Ltd is aware that tasks involving Manual Handling have the potential to cause Musculoskeletal Disorders (MSDs).

In accordance with the *Manual Handling Operations Regulations 1992*, and so far as is reasonably practicable, the Company:

- Avoids the need for any hazardous Manual Handling.
- Assesses the risk of injury from hazardous Manual Handling.
- Reduces the risk of injury from hazardous Manual Handling.

Team lifting or mechanical lifting aids are used where possible to reduce or eliminate Manual Handling hazards.

The Company expects that Employees make proper use of any equipment provided to assist in Manual Handling tasks and to report any Manual Handling issues to the Director with Responsibility for Health and Safety.

The Company will ensure that all Employees are provided with suitable and sufficient information relating to the hazards associated with Manual Handling and the results of any assessments undertaken.

If identified as a requirement during the Risk Assessment process, appropriate Employees will be provided with the necessary training to promote safe handling and lifting techniques.

4.26 NEW/EXPECTANT MOTHERS

Petrocom Ltd will arrange to undertake a Risk Assessment for new or expectant mothers should the situation arise, as required by the *Management of Health and Safety at Work Regulations 1999*.

The definition of a new/expecting mother is someone who is pregnant, has given birth within the previous six (6) months or is breastfeeding.

Therefore, the Company will identify hazards and evaluate the risks in the workplace for new and expectant Mothers. The Company will also provide relevant known risk information to female Employees of childbearing age, as required.

The Company understands that if an identified risk cannot be designed out then the new/expectant mother will be entitled to a change in work conditions or be offered suitable alternative work. If a change of duties cannot be arranged then the new/expectant mother may be suspended from work on full paid leave for as long as is necessary.

This action may be taken once an Employee has given the Company notice in writing that she is pregnant, has given birth within the last six (6) months or is breastfeeding. If the Employee continues to breastfeed for more than six (6) months after the birth then additional arrangements can be made with the Employee.

4.27 NOISE

Certain tasks undertaken during the Company's undertakings will involve the generation of excessive noise at or above the Lower Exposure Action Value (80dB(A)).

When this situation occurs, as necessary, suitable assessments will be undertaken under the *Control of Noise at Work Regulations 2005*.

Petrocom Ltd will provide suitable ear protection, upon request, if any Employee is likely to be exposed to noise at or above the Lower Exposure Action Value (80dB(A)).

The Company will also provide Employees with suitable ear protection if the Company are unable by any other means to reduce the levels of noise to which an Employee is likely to be exposed to below the Upper Exposure Action Value (85dB(A)).

Where an Employee is regularly exposed to the Upper Exposure Action Value (85dB(A)), as identified in the *Control of Noise at Work Regulations 2005*, the Company will arrange regular health checks (Health Surveillance).

The main aim of Health Surveillance is to detect early indications of noise induced hearing loss to allow the Employer to introduce measures to prevent further harm to the Employee.

The Company will also ensure that none of its Employees are exposed to the Limit Value of 87dB(A), in accordance with the *Control of Noise at Work Regulations 2005*.

Noisy Work Equipment (WE), before purchase or supply, is assessed as regards its noise output and alternative items selected where possible, if this is necessary.

Regular maintenance is undertaken so as to ensure that tools and equipment do not produce more noise over their lifetime.

Such maintenance may include ensuring that holding down bolts and housings are secure to reduce additional noise from reverberation and vibration.

The Company will ensure that its operations are properly planned so as to limit the number of noisy items of Work Equipment (WE) in use at any one time.

4.28 ON-SITE PREMISES

For the majority of work carried out by the Company, Employees work on-site for Clients.

Therefore, it is essential that all Employees who are on the premises of a Client comply with, where necessary, all the health and safety practices and working procedures for that Client.

The Company endeavours to be aware of any requirement or any local site rules that may be relevant to the Company when the Company is working on the site.

The Company then ensures that all Employees are instructed to comply with them when working on-site.

The Company makes certain that any alterations and additions to the on-site safety rules are received and that these alterations or additions are passed on to all relevant Company Employees working on the project.

4.29 OUTDOOR WORKING

As part of normal operations the Company regularly works in external areas. This can result in exposure to a number of hazards associated with the environment, including:

- **Sunlight (Skin)** - Exposure to this can be apparent when working in external areas without any appropriate skin covering or protection. The Ultraviolet (UV) radiation effects on the skin range from redness, burning and accelerated ageing through to various types of skin cancer (such as Melanoma).

The Company avoids working in direct sunlight without suitable protection such as skin protection creams or skin coverings.

- **Sunlight (Eyes)** - Exposure to this can be apparent when working in external areas without any appropriate eye protection. Exposure can damage the cornea and produce pain and symptoms similar to that of sand in the eye.

The Company avoids working in direct sunlight without suitable eye protection.

- **High winds** - Exposure to high winds can result in a number of hazards including working at height, undertaking lifting operations, carrying and moving large items, etc.

The Company schedules work to avoid work in high winds as far as is reasonably practicable.

- **Cold weather** - Working when external temperatures are low can cause workers to become distracted from their tasks and can also increase the risks associated with Manual Handling.

The Company ensures that suitable cold weather clothing (such as Jackets and Gloves) is provided for Employees and encourages Employees to undertake warm-up exercises prior to any Manual Handling operations that involve a significant risk of incurring a Musculoskeletal Disorder (MSD).

- **Hot weather** - Working in external areas in high temperatures can increase the risks associated with exhaustion dehydration.

The Company encourages Employees to drink plenty of fluids to ensure that hydration levels remain suitable.

- **Snow and ice** - Where areas become icy during the Winter months numerous hazards are presented to Employees and others.

In such conditions the Company ensures that suitable precautions are taken to clear regular pedestrian routes to ensure safe passage.

4.30 PERSONAL PROTECTIVE EQUIPMENT (PPE)

Petrocom Ltd provide suitable Personal Protective Equipment (PPE) to each Employee who may be exposed to an identified risk during the course of Company operations, as required by the *Personal Protective Equipment at Work Regulations 1992*, unless the risk has been controlled by other, more effective methods.

All PPE will be maintained, repaired, cleaned and stored correctly and all necessary information, instruction and training given to those Employees required to use it.

All PPE, identified as being necessary for the task will be worn when required.

All Employees must take reasonable care of any PPE provided by the Company and report to the Contract Manager or to the Health and Safety Coordinator, if any PPE is missing, damaged or faulty.

The Company also recognises that Employees will not incur personal costs for the provision of PPE.

4.31 PRESSURE SYSTEMS

Petrocom Ltd may in the course of Company operations use pressurised Work Equipment (WE), such as compressors and pressure washers during its on-site operations. The Company also use pressure systems at its Malthouse premises to provide suitable heating for Employees.

The Company ensures, so far as is reasonably practicable, that such equipment is properly provided with suitable instructions for its safe operation and the action(s) to be taken in the event of an emergency, as required by the *Pressure Systems Safety Regulations 2000*.

All pressurised equipment will be regularly maintained, taking in to account the system and equipment age, its usage and its operating environment.

The Company will also arrange for a written scheme of examination to be drawn up by a competent person and that the scheme is adhered to, as far as is reasonably practicable, as required by the *Pressure Systems Safety Regulations 2000*.

4.32 RELATIONSHIPS WITH OCCUPIERS AND NEIGHBOURS

The nature of the business of the Company will require many Employees to come into contact with and provide information, help and assistance to occupiers and neighbours of sites where construction activities are being undertaken.

Problems can be experienced with occupiers and neighbours who are frustrated by congestion, noise and other disruptions or disturbances created by construction.

The Company makes every attempt to ensure that occupiers and neighbours are informed at every stage of any activities that will affect them. Compromise is essential to ensure that good relationships are maintained and safety issues identified and correctly communicated.

If any problems with regard to occupiers or neighbours are experienced or are anticipated, then these problems are reported to the Contract Manager or to the Health and Safety Coordinator.

This allows the Company to take appropriate action to reduce any risks presented or to investigate any incident that may have occurred.

4.33 RISK ASSESSMENT

4.33.1 Generic Risk Assessment

The *Management of Health and Safety at Work Regulations 1999* require that suitable and sufficient Risk Assessments be undertaken for the operations of the Company.

Companies having more than five (5) Employees are required to record the significant findings of the assessment. The Company must assess the risks to Employees and any other persons who may be affected by their undertakings.

Risk Assessments are performed for the operations of the Company. Risk Assessments are organised by the Director with Responsibility for Health and Safety. These Risk Assessments are also reviewed, as required.

The arrangements are communicated to all Employees (*Management of Health and Safety at Work Regulations 1999*) and any necessary additional information or training that has been identified is also provided.

4.33.2 Specific Risk Assessment

When persons are likely to be exposed to a high-risk hazard, a specific Risk Assessment is arranged by the Director with Responsibility for Health and Safety.

This is undertaken when the level of detail presented in the Risk Assessments is not great enough to cover a particular set of unique circumstances that may be encountered during the Company's on-site operations.

The Company will then arrange appropriate training and/or Safety Equipment to be made available to ensure that a high degree of safety is maintained during the work.

This is achieved in accordance with the requirements of the *Management of Health and Safety at Work Regulations 1999*, the *Workplace (Health, Safety and Welfare) Regulations 1992* and other associated Legislation.

4.34 SAFETY SIGNS

Petrocom Ltd will ensure that all Safety Signs displayed during the Company's undertakings comply with the requirements of the *Health and Safety (Safety Signs and Signals) Regulations 1996*.

A Safety Sign is a sign that uses a pictorial symbol to provide Health or Safety information or instruction. The sign may also include a written message.

The Regulations do not specify where or when a Safety Sign must be used, but if a sign is displayed it must be one of four (4) types:

- **Prohibition Sign** - this indicates that certain behaviour is prohibited (a red circle with a red stripe across it and a symbol in black).
- **Warning Sign** - this gives warning of a hazard (a yellow triangle with black edges and a symbol in black).
- **Mandatory Sign** - this indicates that a specific course of action must be taken (a blue disc with a white symbol).
- **Information Sign** - this provides Information about safe condition (a green square with a white symbol).

4.35 SAFE SYSTEMS OF WORK (SSoW)

Safe Systems of Work (SSoW) are produced for specific operations carried out during the Company's undertakings.

Special emphasis is given to any work practices that the Company infrequently undertakes, so as to ensure that any danger to Health and Safety is minimised.

All relevant Health and Safety information is communicated to all Company Employees.

4.36 SAFETY INSPECTIONS AND MONITORING

Petrocom Ltd will ensure that regular safety inspections are carried during its undertakings.

The Company will utilise the inspection process to identify unsafe acts and conditions to help prevent loss or injury.

The Company will seek the active involvement of all of its Employees during its undertakings and will provide adequate opportunities for them to raise any Health and Safety issues or concerns they may have.

Therefore, the Company will schedule regular toolbox talks, team briefs, etc. to ensure its Employees are actively involved in identifying and controlling risk.

4.37 SMOKING

The *Smoke-free (Premises and Enforcement) Regulations 2006* and the *Smoke-free (Signs) Regulations 2007* ban smoking in all enclosed public spaces, such as workplaces (including vehicles used for business purposes).

The Law bans smoking in all enclosed or "substantially enclosed" public space places and workplaces by:

- Making it an offence to smoke in "No Smoking" premises.
- Making it an offence to permit others to smoke in "No Smoking" premises.
- Making it an offence to fail to display warning notices in "No Smoking" premises.
- Giving enforcement officers the power to enter "No Smoking" premises.
- Making it an offence to fail, without reasonable cause, to give one's name and address to enforcement officers on request.

Petrocom Ltd will ensure, where appropriate:

- External stubbing out bins are provided at entrances to the workplace.
- "No Smoking" notices are erected so that they are clearly visible to all Employees, Contractors, etc.
- All reasonable measures are taken to ensure that Employees, Contractors, etc. do not smoke in the workplace.

4.38 STRESS

Petrocom Ltd has a general duty under the *Health and Safety at Work etc. Act 1974* to ensure, so far as is reasonably practicable, the health of their Employees at work. This includes taking steps to make sure they do not suffer stress-related illness as a result of their work.

The Company assesses the risks to Health and Safety from the hazards at work, including the risk of Employees developing stress-related illness because of their work. This is in accordance with the *Management of Health and Safety at Work Regulations 1999*.

4.39 TRAINING

Petrocom Ltd recognises the need for training, technical knowledge or experience for Employees to be met as this is seen to be a necessary requirement to reduce the risk of injury.

The Company identifies and implements training needs for Health and Safety requirements as well as proficiency on the job in the workplace.

All Employees are trained in the use of all relevant equipment and systems of work by a responsible person before use.

Special emphasis is given to any work, which the Company infrequently undertakes so as to ensure that any danger to health is minimised.

Records of both official and 'on-the-job' training will be kept by the Company and made available for inspection where and when necessary.

Information regarding hazardous operations that require additional training and the identification of responsible persons is given in 'Appendix A - Specific Health and Safety Information'.

4.40 UNDERGROUND/OVERHEAD SERVICES

Due to the potential hazards associated with underground or overhead services, the Company prevents, so far as is reasonably practicable, any risk of injury from contact with an underground cable/utility or overhead service in accordance with the requirements of the *Construction (Design and Management) Regulations 2007*.

Where required, Employees and Contractors are provided with relevant information or training required under the *Construction (Design and Management) Regulations 2007*.

Procedures to be followed in the event of serious and imminent danger will follow the requirements of the *Management of Health and Safety at Work Regulations 1999*.

As appropriate, competent persons are nominated to implement any evacuation procedures and to contact the necessary external agencies.

4.41 VEHICLES

4.41.1 Use of Vehicles

Petrocom Ltd possesses vehicles for the transportation of Employees.

It is important for the proper and safe functioning of this transport that proper maintenance and care is given to these vehicles so as to not only protect Employees but other workers and members of the General Public.

If any vehicles used by the Company are leased then suitable and regular maintenance and repair of them is arranged, if necessary, to ensure a high degree of protection for Employees and the General Public.

These vehicles are then checked for any defects (eg: worn tyres, defective brakes, etc.) and maintenance to be undertaken at the prescribed periods is also arranged.

All relevant Employees will hold a valid driving licence and will be requested on an annual basis to produce their licences to the Health and Safety Coordinator for inspection.

In addition to licences, relevant Employees will be requested to produce proof of appropriate insurance documents, including business use.

The Company expects that Employees will inform the Health and Safety Coordinator of any endorsements or disqualification periods imposed on them due to motoring offences.

All Employees will observe the Highway Code and traffic management rules imposed during the Company's undertakings.

4.41.2 Use of Mobile Phones

Under the *Road Vehicles (Construction and Use) (Amendment) (No. 4) Regulations 2003*, it is an offence whilst driving to use a handheld device to:

- Speak or listen to a phone call.
- Use a device interactively to access any sort of data - including Internet, text or other images.
- To hold a hands-free phone or other mobile device at any point whilst driving.

The use of a hand-held phone, even when stationary (eg: in a traffic jam, at the traffic lights, etc.) will remain an offence.

Therefore the Company will promote safe driving for Employees by insisting that the use of hand-held mobile phones when driving is not undertaken.

Where the use of mobile phones may be required whilst driving the Company insists that Employees do so only if:

- A hands-free kit is available and then only if the phone is being held in a "fixed" cradle.
- Calls are made or received whilst the phone is being held in a "fixed" cradle.

In addition to these requirements the Company also insists that Employees:

- Save any numbers you may need to a shortcut dial before starting your journey.
- Keep calls short - and not to argue or to enter into intense negotiations.
- Tell callers you are driving and may need to break off your conversation suddenly.

The Company accepts that under certain circumstances an Employer may need to make an emergency call to 999 on a hand-held phone whilst driving, but only if it would be unsafe for the driver to stop.

Drivers may continue to receive data on their phone when on the move, providing that the Driver does not hold the device whilst in operation.

It is also understood that there will be no requirement for the handset to be switched off when in the vehicle.

4.41.3 Use of Satellite Navigation Systems

Satellite Navigation Systems or Global Positioning Systems devices (GPS) should be used safely.

As many of the devices are retrofitted the safe use and positioning of such a device should also be considered:

- The device should be programmed when the vehicle is stationary in a safe location.

- Carefully follow any instructions for use for the device.
- The device should be positioned within the driver's field of vision whilst not obscuring the view of the road around the car, including the driver's peripheral vision.
- The device should not provide an unnecessary distraction and any settings should not be changed whilst the vehicle is moving.
- Drivers should understand what the device icons mean that it can be read quickly without taking concentration away from the road.
- The device should be placed away from any airbags to prevent it causing injury if an airbag were to deploy.
- The device should be secured firmly and should be kept out of the way of a vehicle's controls.

4.42 VENTILATION/EXTRACTION SYSTEMS

Petrocom Ltd will ensure that any required ventilation and extraction systems will be provided in compliance with the *Health and Safety at Work etc Act 1974*, the *Workplace (Health, Safety and Welfare) Regulations 1992* and the *Control of Substances Hazardous to health Regulations 2002*.

Any ventilation and extraction system used by the Company are satisfactorily and regularly inspected and maintained and an up-to-date maintenance log kept.

4.43 HAND ARM VIBRATION (HAV)

Petrocom Ltd uses Work Equipment (WE) that can expose Employees to hand transmitted vibration.

The Company will attempt to eliminate vibration risk totally during its undertakings, so far as is reasonably practicable. Where the risk can't be totally eradicated the Company will reduce vibration risk to as low a level as is reasonably practicable.

The Company will ensure that it's Employees are not exposed to levels of hand transmitted vibration above the 'Exposure Limit value' (ELV), as required under the *Control of Vibration at Work Regulations 2005*.

Where an Employee has been exposed to levels of hand-transmitted vibration that exceeds the 'Exposure Action Value' (EAV), as identified in the *Control of Vibration at Work Regulations 2005*, the Company will arrange regular health checks (Health Surveillance).

The main aim of Health Surveillance is to detect early indications of a disease or condition, such as Vibration White Finger (VWF), to allow the Employer to introduce measures to prevent further harm to the Employee.

All Employees are encouraged to report any early signs of HAVS, such as tingling sensations in the fingers, often referred to as "pins and needles", or other reactions to periods of exposure to hand transmitted vibration from the operation of Work Equipment (WE).

Tools and equipment are selected on the basis of the suitability for long-term use as many tasks are undertaken on an eight (8) hour basis.

Wherever possible, work rotations are employed by the Company so as to reduce exposure to hand transmitted vibration for Employees.

The Company encourages Employees to report any adverse effects from exposure to hand transmitted vibration, such as finger blanching, which would need to be investigated.

The Company is aware of the risks associated with exposure to hand transmitted vibration and encourages all Employees to discuss any issues with a Medical Practitioner.

4.44 VIOLENCE

Petrocom Ltd recognises that people who deal with members of the General Public at any time can be at risk from aggressive or violent behaviour.

Any violent encounter must be reported to the Health and Safety Coordinator, immediately.

The Health and Safety Executive (HSE) defines Work Related Violence (WRV) experienced by an Employee as:

"Any incident in which an Employee is abused, threatened or assaulted in circumstances arising out of the course of his or her employment."

4.45 WELFARE

4.45.1 Company Premises (The Malthouse)

In accordance with the *Workplace (Health, Safety and Welfare) Regulations 1992* special emphasis is given to ensure that Employees, Contractors and others are supplied with suitable welfare facilities, including:

- Washing facilities.
- Drinking water.
- Changing facilities.
- Rest rooms.
- Eating facilities.

The Company ensures that the Company premises are maintained in a clean and efficient state, with a sufficient and properly maintained ventilation system, a reasonable temperature and a suitable and sufficient lighting arrangement.

4.45.2 On-Site Operations

Arrangements for on-site facilities will be established in accordance with the *Construction (Design and Management) Regulations 2007*, including, but not limited to:

- Sanitary conveniences.
- Washing facilities.

- Drinking water.
- Changing rooms and lockers.
- Rest facilities.

4.46 WORK EQUIPMENT (WE)

All Work Equipment (WE) used during the Company's undertakings is regularly inspected and maintained, with an up-to-date maintenance log kept, as required by the *Provision and Use of Work Equipment Regulations 1998*.

Petrocom Ltd arranges any training that is required for the safe operation of WE, as appropriate.

Any safety equipment, including safety devices, guarding of dangerous parts, etc. are also regularly inspected and maintained.

4.47 WORKING TIME

Petrocom Ltd adheres to the requirements of the *Working Time Regulations 1999* by ensuring that there is a limit placed on individuals' working time of forty eight (48) hours per week, averaged out over a twenty six (26) week period (unless otherwise agreed by the individual).

The Company provide other items required by the Regulations such as minimum daily and weekly rest periods, rest breaks at work and also paid annual leave.

Any changes required to the number of working hours (ie: as part of the twenty six (26) week reference period) can be altered only by the agreement with the Company and the individual - the Company exert no undue pressure on an individual to accept other agreements.

4.48 YOUNG PERSONS

Petrocom Ltd may occasionally employ persons under eighteen (18) years old.

As a requirement of the *Management of Health and Safety at Work Regulations 1999*, the Company ensures that the risks to young people at work are assessed before they start work.

The Company lets the parents of school-age children know the key findings of the Risk Assessment and the control measures taken, if required.

Young workers (over minimum school leaving age and under eighteen (18)) may not ordinarily work more than eight (8) hours a day, or forty (40) hours a week, nor work at night between 22:00 - 06:00 or 23:00 - 07:00.

Suitable training is provided for apprentice workers. Apprentices are always supervised by a senior Employee and are excluded from work activities that are regarded as too hazardous.

This may be due to a combination of factors including skill, experience and maturity when using machinery with exposed dangerous parts for example.

The Company also makes reasonable enquiries to ensure that the above requirements will also apply to all Contractors.

5 MONITORING AND REVIEW

The Policy will be reviewed as often as appropriate and as a minimum at least once a year. Circumstances, which may cause the Policy to be reviewed, could include:

- New work practices, which can cause a change in the nature of Company operations and can, lead to changes in training requirements.
- New hazards in the workplace, which require addition to the Risk Assessment and control measures, identified. This in turn, may lead to additional responsibilities and duties of Employees being identified.
- Working experience, which requires addition to the old Policy.
- New Legislation requirements, which require addition to the Policy and may require the identification of further duties within the Company.
- Company re-organisation, which can lead to the redefinition of duties and responsibilities.

Monitoring of the Policy is the responsibility of the Director with Responsibility for Health and Safety.

Observation of the workplace, feedback from the Employees, noting any increases in accidents, sickness, etc. are used as important indicators to monitor the success of the Health and Safety Policy Document.

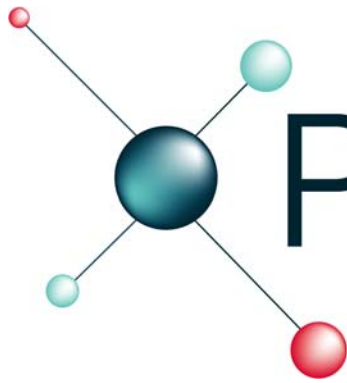
Each Employee is aware of the contents of the Health and Safety Policy of the Company. Therefore, the Health and Safety Policy is made available to each Employee to read.

After reading the Policy and ensuring that he, or she, is satisfied that they understand the contents, Employees sign and date a statement/list to that effect and this is kept in Company files.

When amendments are made to the Policy these amendments will be circulated to all Employees and signed off by each.

FIRE SAFETY		
	<i>Checked by</i>	<i>Frequency</i>
Escape Routes:		
Fire Extinguishers (FFE) (Locations):		
Emergency Procedures:		
Emergency Notices/Signs:		
FFE Maintenance Company:		
Fire Alarm Maintenance Company:		

ADVICE	
Health and Safety Executive (HSE):	Grove House, Skerton Road, Manchester M16 0RB
HSE Telephone Number:	(0161) 952 8200
HSE Information Line:	(0845) 345 0055
HSE Website:	<u>www.hse.gov.uk/hsehome.htm</u>
RIDDOR Reporting Website:	<u>www.riddor.gov.uk</u>
RIDDOR Fax:	(0845) 300 9924
RIDDOR E-mail:	<u>riddor@natbrit.com</u>
TGF Consultants Ltd	Asher House, Barsbank Lane, Lymm, WA13 0ED
TGF Telephone Number:	(01925) 758 900
TGF Fax Number:	(01925) 758 900
TGF E-Mail:	<u>safety@tgfconsultants.co.uk</u>
TGF Website:	<u>www.tgfconsultants.co.uk</u>



Petrocom

working in partnership with


TGF Consultants Ltd
Consultancy in Safety and Software


TGF Consultants Ltd is a Health and Safety Consultancy based in Lymm in Cheshire.

With over 15 years experience in Nuclear, Chemical, Construction, Retail, Leisure and Environmental Sectors we provide tailored and cost-effective services to our varied Client-base.

*TGF Consultants Ltd is working with **Petrocom Ltd** in order to implement a Safety Management System and ensure that this is monitored and updated to comply with the increasing volume of Health and Safety and associated Legislation.*

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