



HEALTH AND SAFETY POLICY

**TITON HARDWARE LIMITED (MANUFACTURING DIVISION)
Falconer Road, Haverhill, Suffolk, CB9 7XU**

**TITON HARDWARE LIMITED (MAIN OFFICE)
894 The Crescent, Business Park, Colchester, Essex, CO4 9YQ**



Contents

Safety Policy Statement of Intent

1.0 Management Organisation

- The Board of Directors
- Chief Executive Responsibilities
- Health and Safety Management Committee
- Directors
- Health and Safety Officer
- External Health and Safety Consultant
- Occupational Health
- Managers and Supervisors
- Responsibility of All Employees, Temporary Employees, and Sub-Contracted Employees

2.0 The Workplace (Health, Safety & Welfare) Regulations 1992

3.0 The Management of Health and Safety at Work Regulations 1999

- 3.1 Risk Assessments
- 3.2 Training
- 3.3 Competence
- 3.4 Visitors
- 3.5 Lone Working
- 3.6 Workplace Safety
- 3.7 Fork Lift Truck Operations
- 3.8 Working at Heights
- 3.9 Personal Protective Equipment (PPE)
- 3.10 Control of Substance Hazardous to Health (COSHH)
- 3.11 Manual Handling
- 3.12 Portable Electrical Equipment
- 3.13 Young Persons
- 3.14 Health and Safety Consultation with Employees
- 3.15 Pwuer
- 3.16 Loler
- 3.17 Use of Display Equipment
- 3.18 Fire
- 3.19 Abrasive Wheels
- 3.20 RIDDOR
- 3.21 First Aid
- 3.22 Control of Working Time
- 3.23 Electricity
- 3.24 Audit
- 3.25 Emergency Response
- 3.26 Noise
- 3.27 External Authorities
- 3.28 New and Expectant Mothers
- 3.29 Health and Safety Information
- 3.30 Construction, Design, and Management (CDM)
- 3.31 Power Press

Health and Safety		Issue No: 8
		Amendment : 8
	Health and Safety Policy	Date: 1 November 2019
		Page: 1 of 31

Health and Safety Policy Statement

The Health and Safety at Work of all employees is of prime importance to Titon, (the "Company or Titon") and it is recognized that in order to maintain the high standards required both management and all employees must be aware of and accept their respective responsibilities.

It is the Company's policy to take all reasonable practicable steps to ensure the Health and Safety and Welfare of its employees when they are at work.

Titon will fully comply with the duties placed upon it under Statutory Legislation, whilst at all times complying with, as a matter of best practice, the requirements and duties set out within Approved Codes of Practice and Guidance as issued by the Health and Safety Executive.

All employees and subcontractors are expected to co-operate and assist the implementation of this policy whilst ensuring that their own works, so far as is reasonably practicable are carried out with no risks to themselves, others, or the environment.

The Company will take all reasonable practicable steps to ensure the Health and Safety at Work of its employees, all visitors, and contractors, and in particular:

- Provide and maintain a safe and healthy working environment and working conditions with adequate facilities and arrangements for Welfare at Work
- Provide equipment, safe systems of working, and safe systems of storage, handling, and transportation that are safe and without risk to health
- Provide the instruction, training, information, and supervision necessary to ensure the health and safety of all employees, contractors and visitors
- Carry out risk assessments of all work activities
- Provide effective procedures for the evacuation of its premises in the event of any emergency.

Employees are to:

- Take reasonable care for their own health and safety and the health and safety of others who may be affected by their actions
- Co-operate fully in ensuring that the Company is able to carry out its health and safety obligations and to obey any health and safety instructions
- To use the correct safety equipment or personal protective equipment the Company provides.

The operation of this policy and procedures will be monitored and reviewed on a regular basis to ensure that they remain current and applicable to the Company's activities.

Titon Hardware Ltd.

SIGNED:  DATED: 01 November 2019

David Ruffell
Chief Executive Officer

1.0 Management Organisation

The Board of Directors

The Board of Directors recognise that it has ultimate responsibility for all matters relating to the Company's legal obligation to protect the Health, Safety and Welfare of the Company's employees and others who may be affected by the Company's business activities.

Chief Executive Responsibilities

The Chief Executive Officer (CEO) is responsible for the overall arrangements within the Company and for ensuring that the Company's operations are executed at all times in such a manner as to ensure, so far as is reasonably practicable, the health, safety and welfare of all employees and others who may be affected by its operations.

Health and Safety Management Committee

The Health and Safety Management Committee is accountable to the Board of Directors for the implementation and monitoring of the policy within the area of their specified responsibility.

- The Health and Safety Management Committee will meet every 3 months.
- All Health and Safety Management meetings including Accidents, Incidents, Near Misses, new business are discussed and recorded at all meetings.

Directors

In order to discharge their responsibilities the Directors will allocate such resources as are required to ensure that the strategy described in the Company's Health and Safety Policy Statement together with the supporting procedures contained in this document are applied at all times.

In the event of a Director identifying a situation that could represent imminent danger of a serious injury he will instruct that work ceases forthwith until the matter is resolved.

Health & Safety Officer

The Health and Safety Officer (HSO) will support the Directors by ensuring that all hazards identified within the Company are subject to risk assessment. He/she will communicate the risk assessment findings and necessary control measures to reduce the risk to all employees under their control and others who may be at risk.

The Health and Safety Officer must contact a Director immediately:

- if situations are found that require immediate rectification or stopping of any operation and will:
- Carry out investigations in all accidents and near miss incidents and to record the findings on the relevant forms
- Advise and report all incidents reportable under R.I.D.D.O.R to the Health and Safety Executive ("HSE") authorities
- Highlight areas where training is required to meet the standards imposed by Legislation, Approved Codes of Practice (ACOPS) and HSE guidance

External Health & Safety Consultant

Where appropriate the Directors will appoint an external consultant to advise them on health and safety matters.

The Health and Safety Consultant will provide advice and support to the Company and visit the Company twice a year.

Titon has currently appointed MAKE UK as its external advisor under Regulation 7 of the Management of Health and Safety at Work Regulations (MHSWR) 1999.

Their contact details are

Mike Prince
HSS Consultant
MAKE UK
Regus
Atlantic House
Imperial Way
Reading, Berkshire
RG2 0TD

☎ **07764 246060 (Mobile)**

✉ **mprince@eef.org.uk**

@ **www.eef.org.uk**

Occupational Health

Where appropriate the Directors will appoint an external occupational health service to look after the workplace health of their employees.

Occupational Health will provide a service to health screen all Titon employees to ensure that their health is not affected by their work.

This will include hearing tests, respiratory tests, skin questionnaire, and forklift truck, confined space, working at height, and Stress management assessments. All employee records will be data protected.

Occupational Health will provide the service to medically assess all Titon employees and visit the Company every month.

Titon has currently appointed WorkFit as its external Occupational Health provider.

Their contact details are

WorkFit UK Limited
Unit 9 Hall Farm
Fornham Business Court
Fornham St. Martin
Bury St Edmunds
Suffolk
IP31 1SL

☎ **01284 330212**

✉ **OHADminBury@workfit-uk.com**

Managers and Supervisors

Managers and Supervisors led by the Operations Manager (OM) at Haverhill will support Titon by ensuring that the Health and Safety Policy is implemented throughout the Company's operations. This will include the wearing of appropriately suitable Personal Protective Equipment (PPE) and correct operation of Fork Lift Trucks etc.

They will ensure that operators are sufficiently trained and competent to be able to operate machinery safely.

Responsibility of All Employees, Temporary Employees and Sub Contracted Employees

All employees including part time and casual workers have their responsibilities under the Health and Safety at Work Act 1974, in particular the following:

- It shall be the duty of every employee, while at work to take reasonable care of the health and safety of themselves and of other persons who may be affected by their acts or omissions at work
- No persons shall intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety and welfare in pursuance of any of the relevant statutory provisions.

Employees that are in breach of health and safety procedures may be subject to disciplinary action being taken against them.

In simple terms, this means all employees shall:

- Read and understand the Company Health and Safety Policy and Procedures and carry out their work in accordance with its requirements
- Use the correct tools and equipment for the job
- Keep tools and equipment in good condition
- Where necessary, wear the appropriate PPE, Hearing Protection, Safety Shoes, protective clothing etc.
- Work in a safe manner at all times without taking unnecessary risks which could endanger themselves and others
- Warn other employees, particularly new employees and young people of particular known hazards
- Do not use any plant or equipment at work for a task for which it was not intended or if they are not trained or experienced to use it
- Report to a Manager/Supervisor any damage to equipment, any hazards and near misses
- Not play dangerous practical jokes or horseplay whilst at work
- Report any injury resulting from an accident at work

The Workplace (Health, Safety & Welfare) Regulations 1992

The Workplace (Health, Safety, and Welfare) Regulations 1992 replace the main requirements of Factories Act 1961 and the Offices, Shops and Railway Act 1963.

The regulations cover the working environment, general safety, facilities for washing, eating, changing, and good housekeeping.

The Company will provide working conditions in compliance with the regulations, in particular:

Temperature

During working hours, the temperature in all work places inside buildings shall be reasonable.

Ventilation

All workplaces and offices will be suitably ventilated with sufficient fresh air.

Lighting

All workplaces shall have suitable and sufficient lighting.

Working Areas

All workstations in the workplace shall have sufficient space taking in to account furniture, fittings, equipment, and machinery so far as is reasonably practicable.

Seating provided should give adequate support to the lower back and a footrest provided for workers who cannot place their feet flat on the floor.

All floors and traffic routes shall be kept free from obstruction at all times.

Allow people and vehicles to move safely, keeping vehicles and pedestrians apart by ensuring that they use separate routes. If people and vehicles have to share a traffic route, use barriers or clear markings to designate a safe walkway.

All windows and transparent areas in doors, gates, walls, and partitions will be made of safety material and suitably protected.

Welfare

Sanitary conveniences and washing facilities

Sufficient sanitary conveniences will be provided at readily accessible places in the workplace. Provide arrangements to ensure that the rooms containing toilets or washing facilities are will lit and kept clean. Washing facilities should have hot and cold or warm water, soap or other means of cleaning and drying.

Drinking water

Adequate supply of wholesome drinking water for the workplace and that it be readily available at suitable and clearly marked places.

Accommodation for clothing and facilities for changing

An adequate, suitable space should be provide to store workers own clothing. Provide changing facilities for workers who change into special work clothing and should ensure the privacy of the user.

Rest facilities and eating meals

Suitable and sufficient, readily accessible rest facilities should be provided.

Provide seats for workers to use during breaks. Rest rooms should be large enough and have sufficient seats with backrests and tables for the number of workers likely to use them at any one time.

Provide suitable and sufficient facilities for workers to eat meals at work.

Where provided, eating facilities should include a facility for preparing or obtaining a hot drink.

Provide suitable rest facilities for pregnant women and nursing mothers.

Smoke free workplace policy

Under the Health Act 2006, legislation makes provision for the prohibition of smoking in certain premises and vehicles.

This policy aims to provide a healthy working environment to protect the current and future of employees and members of the public.

Therefore, smoking which includes e-cigarettes are not permitted in any part of the premises leased or owned by Titon except for designated smoking areas during unpaid lunchbreaks.

3.0 The Management of Health and Safety at Work Regulation 1999 (MHSWR 1999)

MHSWR 1999 covers the management of health and safety and the Health and Safety at Work Act 1974. Further information is contained in the appropriate Approved Code of Practice (ACOP).

The Company will, in accordance with MHSWR 1999 carry out the following activities to provide health and safety for their employees:

- Identify all foreseeable hazards and risks to enable the necessary preventative and protective control measures to be identified
- Record the risk assessment and issue copies to all those affected
- Ensure that effective arrangements are put in place for planning, organisation, control and monitoring and review of health and safety
- Develop plans and procedures for dealing with emergencies and for work in dangerous areas
- Provide adequate information, training and consultation with employees on health and safety matters.

The Company will bring to the attention of the workplace all the necessary precautions detailed within a risk assessment and will monitor the operations so that each operative is acting in accordance with the details outlined in the written assessment.

3.1 Risk Assessments

Titon recognises its legal obligations to assess the hazards contained within or created by its business activities and to reduce risk to an acceptable level.

Under existing Health and Safety legislation an employer has a duty to inform all their employees and anyone who may be affected by their operations of any hazards and associated risk that they may be exposed too.

Under MHSWR 1999 employers have a duty to carry out a risk assessment on any work activity which poses a health and safety risk. Under these regulations:

Every employer must make suitable and sufficient assessments of:

- (a) The risks to the health and safety of their employees to which they are exposed whilst they are at work; and**
- (b) The risks to the health and safety of persons not in their employment arising out of, or in connection with, the conduct of his undertaking**

A risk assessment is the identification of hazards associated with the work activity, the workplace, and the environment. Timescales for the risk control measures should be as short as reasonably practicable. All risk assessments will be recorded and easily accessible to all relevant persons.

The risk assessment is in line with the HSE's recommended five steps to Risk Assessment notably:

1. Identify ALL hazards and their associated risks
2. Identify who could be harmed and how
3. Evaluate the findings
4. Record all findings of the assessment
5. Review the assessment periodically.

Definitions

Hazard – Something with a potential to cause harm, injury or ill health, production losses, damage to equipment or the environment and increased insurance liabilities.

Risk – Likelihood that harm from particular hazard will be realised.

Suitable and Sufficient – An assessment carried out by a competent person that focuses on the risks likely to arise out of the work.

Chronic – Long-term health effect may be the result of repeated low-level exposure.

Reasonably – Allows the employer to balance the cost taking action against the risk considered.

Practicable – Must be feasible and considered current best practice.

Control Measures – The necessary precautions implemented to reduce the risk to the lowest possible level of exposure.

Once all hazards associated with risks have been clearly identified they will be evaluated using the Titon risk control matrix, which is shown below.

MHSWR 1999 require that significant findings resulting from the risk assessment recordings should include:

- The significant hazards identified in the assessment
- The existing control measures that are in place
- The population which may be affected by these significant risks and hazards, including any groups of employees who are especially at risk
- Where applicable a list of actions taken, with timescales to reduce risks as far as reasonably practicable.

Written records of these findings will be stored on file at all times.

Communication of Findings

Employees must be informed of the findings off the risk assessment together with the measures put in place which are designed to reduce the risk as soon as is reasonably practicable following the completion of assessments.

Review of Risk Assessment

Risk assessments will be reviewed periodically:

- If there has been a change in the task / activity
- Risks to young persons, new or expectant mothers, disabled persons
- In the event of a lost time accident, significant near miss
- On a regular basis – at a period no greater than two yearly.

Titon Risk Control Matrix:

Risk Rating Table						
 Titon [®]	SEVERITY					
	1	2	3	4	5	
LIKELIHOOD	1	1	2	3	4	5
	2	2	4	6	8	10
	3	3	6	9	12	15
	4	4	8	12	16	20
	5	5	10	15	20	25
Category						
		LOW - Acceptable				
		MED - Controls Required				
		HIGH - Controls Required				

Likelihood and Severity measured as 1: Low to 5: High.

Red – High Risk

High-risk activities will stop immediately and the situation discussed with Management. The discussion will determine the accuracy of the assessment and where necessary, identify the additional controls required to reduce the risks as far as reasonably practicable.

NOTE: Some activities however controlled may fall into a high risk.

Amber – Medium Risk

Medium activities falling into this category require action to reduce risks further. An introduction of any additional controls shall be as soon as is reasonably practicable.

Green – Low Risk

Low risk activities falling into this category are acceptable.

The ranges of work activities to be risk assessed are as follows:

- Manual Handling and ergonomics
- Lone Working
- Fire at work
- Personal Protective Equipment
- Slips / Trips / Falls
- Use of Machines
- Guarding
- New Machinery
- Noise
- Vibration
- Lighting
- Dust and Fumes
- First Aid
- Vehicles and Pedestrians
- Fork Lift Trucks
- Chemical Spill
- Confined spaces
- Ladders
- Working at height
- Mobile Elevated Working Platform (MEWP)
- Control of Substances Hazardous to Health (COSHH)
- Signs
- Environment
- Power Presses
- Young Persons
- Contractors
- Display Screen Work Stations
- Gas
- Use of hand held tools
- Mechanical Lifting aids and operations
- Compressed Air
- Access and egress
- Falling objects from height
- New or expectant mothers
- Light duty assessments
- Racking

This list is not conclusive and every employee needs to assess the situation and consider if a risk assessment should be performed.

Titon utilises the Safety Organiser management reporting software developed by EOA Systems as an external Health and Safety Organiser System and to store risk assessments.

Their contact details are

**Alastair Tholen
EO Associates Ltd.
Interchange Business Centre,
Howard Way,
Newport Pagnell,
Buckinghamshire
MK16 9PY**

**☎ 01908 299119
☎ 07801 987859 (mobile)
www.eoa.co.uk**

3.2 Training

Training and Supervision of Employees (including Temporary and sub-contracted employees)

Titon recognises its responsibilities with regard to ensuring all persons employed have full training to carry out their duties.

The persons most at risk are new starters when they first commence employment with the Company. In order to discharge its legal obligations towards the health and safety of new starters the Company will adopt the procedures described below.

Additionally, the Company will apply identical standards towards protecting the health and safety of temporary employees as to those employed by the company on a permanent basis.

Procedures

Only those persons who are able to demonstrate that they have the necessary skills, experience, and / or training to ensure their own health and safety and that of others, who may be affected by their work activities, will be allowed to work without direct supervision.

Other personnel will work under direct supervision of a competent person, until they have achieved the required level of experience and competence to carry out their duties without compromising their own health and safety or that of others and added to department training matrix.

All new starters will have a full induction with Human Resources and full induction training with Department Managers on the following topics:

- **Manual Handling** – All new starters to watch a manual handling DVD and answer Manual Handling questions
- **Personal Protective Equipment (PPE)** – All new starters will be given the correct PPE for their working area
- **Hazards** – All new starters will be informed of all safety rules and to report general hazards they may encounter together with the measures in place to reduce the risk
- **First Aid** – All new starters will be informed who the first aiders are and to report all accidents
- **Fire Arrangements** – All new starters will be informed of their nearest fire exits / routes and assembly point in an event of a fire
- **Safety Representatives** – All new starters will be informed who the safety representatives are
- **Sites Walkways** – All new starters will be shown the safe walkways inside and outside including pedestrian and vehicle areas
- **Risk Assessments** – All new starters will read and sign the risk assessments and COSHH risk assessments in their working area
- **Department Tour** – All new starters will be shown where the toilets, canteen, cloakroom, car park and clocking in and out areas are
- **Area Safety Check Form** – All new starters to read and sign and return to HR, where they are held on file

3.3 Competence

Competent Persons

Titon recognises its responsibilities with regard to ensuring that all persons employed by the Company are competent to carry out their duties in such a manner so as not to put at risk their own health and safety. The following statement sets out the competence expected of all personnel employed by the Company.

Existing Staff

Only those persons who are able to demonstrate to their Manager / Supervisor that they have the necessary skills, experience, and training to ensure their own health and safety will be allowed to work without direct supervision.

New Employees

All new employees will receive both induction and ongoing health and safety training as is appropriate to the individual's job content.

All new employees or trainees will work under the direct supervision of a competent person until such time as their Manager / Supervisor is satisfied that the person has achieved the right level of experience and competence.

Where performance is less than satisfactory further training is required to achieve competence.

3.4 Visitors

Titon recognises its responsibility in protecting the Health and Safety of any persons visiting the Company's Premises. In order to discharge its responsibilities the Company has adopted the following policy:

Definition

Visitors are considered to be those persons who are not employed by the Company but enter the Company's Premises. This excludes drivers making deliveries.

Procedure

- Upon arrival, all visitors must report to Reception, sign in the visitors book, and wear a Titon visitors ID badge
- All visitors at Haverhill entering the factory must complete the Health and Safety site Questionnaire and Sign / Date
- At Colchester all visitors / contractors must read the Health and Safety Fire Evacuation procedure and sign in the visitors book and wear a Titon visitors ID badge
- All visitors / contractors must wear a Titon badge once signed in
- The visitor's host will meet their visitor / visitors in the reception area. Under no circumstances will unaccompanied visitors be allowed to go beyond the reception area unless authorised to do so
- Visitors are the responsibility of the person with whom they have an appointment. This person must accompany the visitor at all times
- On leaving the site, visitors will be escorted back to reception area where they will sign out and hand back their Titon ID badge

3.5 Lone Working

Titon recognises its legal obligations under the Health and Safety at Work Act 1974 to protect its employees at all times. In order to discharge its responsibilities when workers are required to work alone the Company has adopted the mandatory procedure below.

Definition

The term Lone Working applies to the following:

- Remote lone operatives
- Working on the road
- Night and weekend call out if the alarms have gone off
- Remote working at weekends

General

Lone working is only permitted if ALL of the following conditions apply:

- Only persons competent to undertake the work will be considered for the task
- Facilities exist to easily call for emergency assistance, this includes a mobile phone together with a list of appropriate contacts
- Only employees considered to be sufficiently mature and competent will be permitted to work alone
- All risk assessments and procedures are completed before the work commences
- Permit to work will be issued along with the permit for working at height
- All appropriate control measures are in place and are effective. All appropriate check in or check out procedures will be operated between the operator and their line manager
- The premises are secure and safe

3.6 Workplace Safety

Titon recognises its obligation to ensure the workplace remains a safe working environment for their employees.

The Company recognises that the most common hazards are Slips, Trips and Falls.

To bring these hazards under control the following actions should be taken:

- Trailing leads will be stored away so not to present a trip hazard
- Spillages will be cleared up immediately
- Flooring will be repaired
- Corridors, walkways, fire exits and working stations will be kept clear of debris
- Corridors, walkways, stairways in the building will be kept lit
- Outside of the building will be kept lit
- Housekeeping to take place daily in all areas with clean as you go at all times
- Workplace / Area risk assessments will be carried out

3.7 Fork Lift Truck Operations

Titon recognises its legal obligations to assess the hazards and risks associated with the use of Fork Lift Trucks (FLT's).

Where the Company provides such equipment the Provision and Use of Work Equipment Regulations 1998, (PUWER) must cover it.

In order to meet the requirements of PUWER and to ensure the Health, Safety, and Welfare of their employees and others, the Company has adopted the following rules:

- Only trained and qualified competent staff can drive and operate FLT's
- All FLT's shall comply with current U.K. health and safety legislation
- All loads shall be securely fastened before operating the vehicle
- All FLT's shall have suitable and sufficient hazard alarms (both audible and visible)
- All FLT's shall be maintained under a suitable schedule

- All FLTs have a pre-start safety inspection before using daily and Safe System of Work (SSOW) signed record
- All FLTs that FAIL the inspection due to a fault must be reported immediately to their Manager and a sign placed, DO NOT USE until the vehicle has been repaired and signed back by the competent contractor to the Manager
- All FLT SSOW records are kept with the Health and Safety Officer
- All operators have a 3 yearly refresher course with a competent FLT trainer

The types of FLTs used at Haverhill are as follows:

- Powered Trucks
- Stacker Powered Trucks
- Tool Trolleys
- Pickers
- None Powered Pallet trucks

3.8 Working at Height

Titon recognises its legal obligations to assess the hazards contained within or created by its use of any operation or process that includes the dangers associated with working at height, including ladders, mobile elevated work platforms (MEWPs) and mobile tower scaffolding.

Under the Working at Height Regulations 2005, employers have a duty to carry out a risk assessment on any work activity that involves the employee working at height.

The Working at Height Regulations covers any work in the place from which a person could fall enough to cause personal injury.

Titon recognises that it must ensure that work at height is carried out safely and its first priority is to ensure that all working at height operations where these regulations apply is to avoid working at height, if possible.

If this is not possible then the employer must make sufficient measures to ensure that the consequences of falling from height are minimised.

The following measures will be implemented:

- Use of collective fall prevention measures such as guard rails and working platforms
- Where the risk of a fall cannot be eliminated, equipment safe system of work shall be put in place to minimise the distance and consequences of a fall, (use of fall nets and airbags)
- Only fully trained operatives, who are aware of the risks and protective measures associated with any working at height, are permitted to carry out any working at height
- A permit to work and a work at height permit must be issued when using MEWPs and Mobile Tower Scaffolding prior to any working at height

MEWP

When using MEWPs ensure that adequate preparation is suitable and carried out to ensure a safe system of work (SSOW).

Prior to use consideration is given to:

- Space around the workplace
- Ground conditions
- Platform loading
- Lighting in the area
- MEWPs to have a pre-start safety inspection before using daily and a SSOW signed record
- MEWPs shall be maintained under a suitable schedule
- MEWPs that FAIL the inspection due to a fault must be reported immediately to their manager and a sign placed DO NOT USE until the MEWP has been signed back as repaired by a competent person to the Manager
- A permit to work and a work at height permit must be issued when using MEWPs prior to any working at height
- Emergency procedure if the MEWP breaks down whilst positioned at height

- All MEWP SSOW records are kept with the Health and Safety Officer

Any MEWP used must be fit for purpose, suitable, sufficient, and fitted with all relevant necessary safety devices such as guards, barriers and warning devices.

Only trained and qualified competent staff can operate the MEWPs.

- All operators using the MEWP have a 3 yearly refresher course with a competent MEWP trainer.

Ladders

All ladders and stepladders used are in accordance with the Work at Height Regulations 2005.

- All persons using ladders have had training
- Training is recorded and kept in the Health & Safety office
- Trained ladder inspectors inspect all ladders every 3 months
- All inspections recorded are logged in the ladder log folder
- Inspection tags are attached to the ladders with inspection dates and who has carried out the inspection
- The ladder log is stored in the Health & Safety Office.

All defective ladders taken out of service are issued with a red tag **DO NOT USE / SCRAP** and replaced with the correct suitable ladders.

3.9 Personal Protective Equipment (PPE)

Titon recognises the duties and obligations established by the Personal Protective Equipment at Work Regulations 1992. Titon will provide suitable, properly fitting, and effective PPE where the risk assessment identifies a requirement for the worker's protection.

All personnel required to use PPE will have adequate information and training to enable a further understanding of the issues associated with its use. Titon will:

- Recommend risk assessment of proposed PPE to determine whether it is suitable
- Take appropriate action following the assessment of risk
- Provide accommodation for the correct storage of PPE
- Train all staff in the safe use of PPE
- Replace any PPE as necessary and at no cost to the employee
- Provide adequate information to every employee in respect of any risks which may exist
- Re-assess as necessary if substances used or work processes or equipment change

Employees must ensure all PPE is provided to them in accordance with the training and instruction. Employees must report immediately if the PPE is lost or any obvious defect in any equipment provided to their manager.

3.10 Control of Substance Hazardous to Health (COSHH)

Titon recognises its legal obligations to access the hazards contained within or its use of any hazardous substances as stated under the Control of Substances Hazardous to Health Regulations 2002 (COSHH 2002).

Under the Health and Safety legislation, the employer has a duty to inform all their employees affected by their operations and associated risk that they may be exposed to.

Under COSHH 2002, Titon will carry out COSHH risk assessments and work activity risk assessment that involves the use of all substances.

The risk assessments on both the substance (COSHH) and workplace are stored on the SEOA Safety Management System and hard copies are stored in all departments.

All external Material Safety Data Sheets and Technical Data Sheets are maintained and to up to date from the substance supplier and hard copies are in all departments.

Risk assessments updated accordingly.

COSHH Regulation 9 states that employers using Local Exhaust Ventilation (LEV) systems must ensure that they are operating effectively. The LEV Regulations require that local Exhaust Ventilation Examination and testing to be at least once every 14 months by competent persons.

3.11 Manual Handling

Titon recognises the hazards to Health and Safety that could result from the manual handling of loads. In order to discharge its responsibilities under the Manual Handling Operations Regulations 1992 and to protect the health and safety of employees the Company has adopted the following:

Elimination

Manual handling operations where reasonably practicable are eliminated by mechanisation or good ergonomic design of workstations.

Training

Where it is not reasonably practicable to eliminate manual handling operations, persons whose duties include the manual handling, pushing and pulling of loads will receive such training as is appropriate to protect their own health and safety. All training is carried out on induction and thereafter refreshed every 3 years.

Risk Assessment

As part of the Titon Manual Handling Risk Assessment process, all manual handling operation risks are identified, the results recorded in writing and stored on the SEOA Safety Management System and a hard copy kept in all departments. Where applicable all personnel will be retrained against their risk assessment.

Task – With reference to the actions, postures and movements that are required to complete the task.

Individual's Capacity – employees who carry out the task and any special considerations that could increase risk including but not limited to pregnancy and past injuries.

Load – With reference to its weight, shape, size, centre of gravity and any external features that may represent a hazard.

Environment – With reference to space constraints, floor conditions and housekeeping standards that apply where the task is to be undertaken.

Repetitive Tasks -Where the task is of a repetitive nature such as to represent risk of repetitive strain injury, the task will be the subject of a separate and specific risk assessment using the Assessment of Repetitive Tasks (ART) tool to risk assess tasks that require repetitive movement of the upper limbs (arms and hands). The ART tool also assists in risk assessing the common risk factors in repetitive work that contributes to Upper Limb Disorders (ULDs).

3.12 Portable Electrical Equipment

Titon recognises the dangers that can arise from Portable Electrical Equipment and its legal responsibilities under the Electricity at Work Regulations 1989 to ensure that all Portable Electrical Equipment is maintained in a safe condition at all times. In order to meet its legal obligations and to achieve and maintain a low risk-working environment, Titon has adopted the following.

Definition

Portable Electrical Equipment is any piece of electrical equipment connected to the mains power supply by means of a flexible lead and plugged into a fixed socket.

- All power tools, their transformers and leads
- Battery powered tools and their chargers and leads

Register of Equipment

Haverhill site will maintain a full PAT test register of all electrical equipment with the Maintenance Manager. The Maintenance Manager will monitor the PAT testing requirements and the method of disposal of any old equipment.

Colchester site will maintain a full PAT test register of all electrical equipment with the Health and Safety Officer. The Health and Safety Officer will monitor the PAT testing requirements and the method of disposal of any redundant equipment.

PAT Testing

All portable electrical equipment will be subject to periodic inspection and testing.

Competent persons must test all electrical items covered by Portable Appliance Testing (PAT). Tested items will be labelled with the date of the latest test and initials of the tester.

Any electrical items that fail the PAT testing will be removed from service immediately.

Any privately owned portable electrical equipment brought onto the Company's sites have to be PAT tested before use and added to the register.

Frequency of Testing

There are no rules regarding how often Portable Electrical Equipment should be inspected or tested. HSE Guidance Notes advise "regular" inspection and testing
Titon Policy for PAT Testing

Frequency of Inspection

- Portable welders every 12 months
- Extension leads every 12 months
- Computer equipment every 3 years
- Portable fans every 12 months
- Portable heaters every 12 months
- Fixed equipment every 3 years
- Phone chargers if double insulated "need only" a visual check first then every 12 months

All electrical equipment will be visually inspected and labelled with the next due date of inspection.

A competent contractor will send Certified Reports to Titon with completed PAT Testing Inspections.

- PAT testing Certified Reports for Haverhill will be kept by Maintenance
- PAT testing Certified Reports for Colchester will be kept by Health & Safety Officer

Employees must co-operate with the Company by carrying out a visual inspection of portable electrical equipment prior to use and to encourage and report any incident that could result in damage to the equipment.

3.13 Young Persons

Titon recognises its duty under the Health and Safety (Young Persons) Regulation 1997 to protect the health and safety of young workers employed or on work experience within the Company. In order to discharge that legal obligation, the Company will adopt the following.

Work experience persons are a particular risk so all work experience will take place in low risk working areas only. (Office work only and factory-escorted tours).

From the age of 16 anyone employed by the Company will be assessed under the Health and Safety (Young Persons) Regulation 1997. They will then work under close supervision until competent to carry out their job activities.

Apprentices are also a particular risk: therefore, from the age of 16 an apprentice employed by the Company will be risk assessed under the Health and Safety (Young Persons) Regulation 1997. They will then work under close supervision until their Apprenticeship is completed.

Risk Assessment

A competent person will make a suitable and sufficient assessment of risks to the health and safety of young workers under 18 years old before they start work. Such assessments will take into account the inexperience, lack of awareness of potential risks and immaturity of the young person. If it is found that after taking all control measures into consideration, the risk to a young person is considered to be significant then they will not be employed on that task.

All risk assessments will be recorded on our EOA Safety Management System as well as a hard copy both locally and centrally.

Training and Supervision

Young persons will work under close supervision of a competent person at all times until they become competent in the workplace

3.14 Health and Safety Consultation with Employees

Titon recognises its legal obligation to consult, either through representatives or directly with concerned employees on all questions relating to Health and Safety at Work in accordance with the Health and Safety (Consultation with Employees) Regulations 1996.

All employees will have the right to consultation on matters of Health and Safety at Work under these regulations.

Employee Safety Representatives

Employees or their representatives are provided with information to allow them to take part in full consultation.

Employees will be encouraged to highlight matters affecting their health and safety including concerns about possible risks and dangerous events in the workplace.

Communication

Communication of the concerns expressed by employees are fed to their representatives who will communicate back to employees.

Health & Safety Meetings are held every 3 months and chaired by the Health and Safety Officer. All meetings are recorded.

3.15 PUWER – Provision and Use of Work Equipment Regulations 1998

Titon recognises the hazards relating to the use of equipment. In order to protect the health and safety of employees and others under the Provision and Use of Work Regulations 1998, (PUWER) the Company has adopted the following general provisions in addition to the specific rules for FLT's:

Definition

The term Work Equipment applies to any machinery, apparatus, or tool for use at work.

Suitability

The work equipment must be suitable for its intended use.

Suitability is a key measure in ensuring that the equipment provided will not introduce further risks to the workplace. The provision of equipment includes the requirement for CE marking.

Operators

Under no circumstances will any person carry out any work, repair or testing on work equipment unless having received appropriate training and having been deemed competent.

Maintenance

All work on equipment maintained is in accordance with a preventative maintenance plan in an efficient state, in working order and in good repair and may have to be isolated or decommissioned when maintenance is carried out. Trained persons who have an appropriate level of competence must carry out any maintenance work.

Certain components or parts of machinery, failure of which could significantly increase risk to health and safety, will be subject to periodic preventative maintenance and recorded inspection.

Inspection of work equipment

It is best practice to check any equipment used daily, prior to use. This ensures that key safety functions are in operation, such as guarding and emergency stops, but also ensures that the equipment is in suitable condition to work with.

Operation and Emergency Controls

This is to ensure that work equipment is safe to use, consideration has to be given not only to the equipment itself, but also the environment where it is to be operated in.

New Equipment

Any new work equipment on the Company's premises (bought, leased or hired) will be subject to a written assessment of its suitability for the purpose of the intended use, and will incorporate such features as required to protect health and safety of both users and others who might be affected by the equipment's operation.

Hand –Held Tools

With hand tools, it is important to check their condition is suitable before use.

Machine Control Measures

Regulation 11 of PUWER stipulates the hierarchy of machinery safeguards as follows;

- Fixed guards
- Interlocking guards
- Trip devices
- Two hand controls
- Emergency stops
- Adjustable / self-adjusting guards

- PPE
- Information, instruction
- Training, supervision

3.16 Lifting Operations and Lifting Equipment Regulations 1998 (“LOLER 1998”)

Titon recognises the hazards relating to the use of Lifting Operations and Lifting Equipment. In order to protect the health and safety of employees and others under LOLER 1998 the Company has adopted the following provisions.

All lifting equipment will have a thorough examination and inspection by a competent person:

- Before first use
- Every 6 months (if used for lifting)
- Pre-start safety inspections are carried out prior to use on all lifting equipment and accessories. A Safe System of Work inspection form is used to record the inspections. Any Lifting equipment that FAILS the inspection due to a fault must be reported immediately to their Manager and isolated with a lock out lock, along with a sign saying DO NOT USE until the lifting equipment has been repaired, inspected and signed back into use by a competent person to the Manager

Reports

A competent person will make a report at the time of the examination and ensure all checks are completed. All the equipment has a coloured tag to show a full examination of the equipment has taken place. Defects should be reported and recorded even if they are repaired at the same time the examination is conducted.

The competent person will notify management immediately of any serious and significant defects.

All LOLER inspection reports are in the Health & Safety Office.

3.17 Use of Display Equipment

Titon recognises the potential of Display Screen Equipment (DSE) operation to cause chronic upper limb disorders (WRULD), and its legal obligations under the Display Screen Equipment Regulations 1992 to take such actions as are required to prevent this type of injury. In order to discharge those responsibilities the following will apply:

Definition

Where employees are required to operate DSE for continuous spells of an hour or more at a time in their working day, they are DSE users and a risk assessment of their workstation is required.

Workstation

Each workstation and operator has to be formally risk assessed using a DSE risk assessment on the EOA Safety Management System.

Eyes and eyesight

DSE users will have their eyesight test paid for by Titon and suitable perception glasses provided.

User Training

Employees operating DSE will have training in all aspects of Health and Safety at the Workstation. This training will include

- Legal responsibilities of users
- Correct sitting posture when operating DSE
- Workstation set-up
- Task rotation and the need for sufficient breaks from DSE related tasks

3.18 Fire

Titon recognises the dangers that can arise in the event of fire. In order to discharge its responsibilities towards protecting the health and safety of personnel from fire hazards and meet the responsibilities under the Regulatory Reform Fire Safety Order 2005 (RRFSO) the Company has adopted the following.

Fire Risk Assessment

An external Company qualified in Fire Risk Assessment under the RRFSO will carry out a two yearly fire risk assessment and take such measures as required in order to reduce risk to an acceptable level.

The Health and Safety Officer will carry out a yearly fire risk assessment using the EOA Safety Management System.

Training

All employees will receive training on evacuation procedures.

Fire drills are carried out in all areas at least twice a year. Records are made and kept centrally, in fire logbooks on each site, and maintained by the fire marshals.

Titon has appointed Fire Marshals at Colchester and Haverhill. They are responsible for ensuring all personal on the premises are safely evacuated in the event of a fire, as follows:

On Hearing the Fire Alarms

Leave the building immediately by the nearest Fire Exit, **DO NOT STOP** to collect personal possessions, once outside the building, assemble at the nominated assembly point. All persons on the fire register will be called to ensure they have been accounted for. Remain at this assembly point until you have been given an instruction it is safe to return to the building.

If you have any Visitors in the building, you are responsible for ensuring their safe evacuation.

Discovering a Fire

Sound the nearest fire alarm. Leave the building to your nearest Fire Exit, **DO NOT STOP** to collect any personnel possessions, once outside the building assemble at the nominated assembly point. Inform the Fire Marshal where the fire is in the building. Remain at this assembly point until you have been given an instruction it is safe to return into the building.

If you have any Visitors in the building, you are responsible for ensuring their safe evacuation.

Fire Marshals

Upon hearing the fire alarms, leave the building making sure people are leaving via their nearest fire exit safely, **DO NOT STOP** to collect any personnel possessions. Fire Marshals will send a person to the main entrance at Colchester and Haverhill to stop any vehicles and persons coming on site. Fire Marshals will check all persons are accounted for, including any visitors, contractors, and report to Management if anyone is missing. Fire Marshals will inform Management of where the fire is, call 999 and ask for the Fire Brigade. Fire Marshals will remain at the assembly point with all persons and ask a first aider to assist if anyone needs first aid. Remain at the assembly point until you have been given an instruction it is safe to return into the building.

MANDATORY INSTRUCTION

Employees under no circumstances must put themselves at risk in a fire situation.

IF IN DOUBT, GET OUT!

Fire registers are in place at Colchester and Haverhill with all new employees added to the registers when they start.

All employees will take part in two fire evacuation drills each year.

Fire drills will be recorded and any findings resolved.

Fire alarm testing is every Wednesday at 11am and recorded in the fire log records.

Housekeeping Standards

Waste products and general waste must be removed to prevent a fire risk.

No combustible waste must be stored under stairways.

Fire routes and fire exits **MUST BE KEPT** clear at all times.

Fire Fighting Equipment

Fire extinguishers are provided in accordance with the requirements shown on the risk assessment. Fire extinguishers will be subject to annual inspection by a competent person. All inspection reports are kept in the Health & Safety Office.

3.19 Abrasive Wheels – Vibrations at Work

Titon recognises its legal obligations to assess the hazards and risks associated with use of portable tools such as bench mounted and hand portable grinders etc.

Titon will ensure that all such tools meet the standards placed upon the Company by the relevant statutory legislation such as the Provision and Use of Work Equipment Regulations 1998 (PUWER) and the Control of Vibrations at Work Regulations 2005 (CVWR).

Management will ensure that all operatives will have full training in the correct safe use of abrasive wheels and associated equipment as required by the legislation.

Suitable and sufficient storage facilities for abrasive wheels and discs will be made available. Sufficient and suitable PPE such as safety goggles, gloves will be issued to persons using abrasive wheels. The person concerned will bring all defects associated with this type of operation to the attention of their line manager.

Titon recognises its legal obligations to assess the hazards contained within or created by its use of any operation or process that exposes the employee to vibrations to the body this includes, the dangers associated with operating hand vibrating and body vibrating equipment such as portable hand grinders.

Under CVWR 2005 employers have a duty to carry out a risk assessment on any work activity which exposes the employee to such risks and has a further duty to inform all their employees and anyone who may be affected of any significant findings from that assessment.

Titon will ensure that all work equipment provided complies with the obligations placed under PUWER and CVWR in that they will not expose the employee to levels of vibration above the statutory limits set as stated in the regulations.

Management will ensure that the information on the vibration levels of any plant or equipment is available to employees before such equipment is used.

Where operatives are required to work in situations where high levels of vibrations are likely, management will ensure that full CVWR risk assessment will be communicated to the operators, before work commences, on the levels and frequencies of any vibrating tools or equipment.

The following measures will be taken to reduce vibration levels:

- Purchasing equipment below the statutory levels
- Ensuring the equipment is maintained in accordance with the manufacturer's instructions
- Reducing the amount of time that operatives use the equipment
- Use of suitable gloves
- Introduction of hand exercises to help alleviate the effects of exposure etc.

Regular monitoring of vibration levels and frequencies will be performed if required. Instruction and training of all relevant employees as required working with plant and equipment, which is likely to result in exposure to high levels of vibration.

3.20 Reporting of Injuries, Diseases and Dangerous Occurrences - RIDDOR

Titon recognises that it has a legal responsibility under the Reporting of Injuries, Diseases, Dangerous Occurrences Regulations 2013 (RIDDOR) to report certain instances of injury to its employees and others who may be affected by the Company's business activities. Every effort will be taken to prevent accidents; however, in the event of an accident occurring the following have been put in place.

First Aid

Titon will appoint an appropriate number of persons who are qualified to provide First Aid. These persons will receive Full First Aid at Work (FAW) training and refresher training at not more than three-yearly intervals.

Accidents

The following describes and defines the categories of accidents covered by this procedure. Note: Details of all accidents requiring First Aid Treatment, regardless of classification, will be recorded in the official Company Accident Form HS:AF:002. All accidents are reported and recorded if they occur on Company premises.

Definitions

'Near Miss Incidents' are considered to be those events that do not cause injury or damage to property but has the potential to cause significant injury or property damage. (Investigation Form HS: AF: 003)

'Dangerous Occurrence' represents an incident that normally involves damage to property and the potential to cause serious injury. (Investigation Form HS: AF: 003)

'First Aid Injuries' represent those injuries which require treatment from a qualified First-Aider; where after the injured person is fit to resume normal duties.

'Disabling Seven-Day Injuries' are when the injured person is not fit to resume their full range of normal working duties. Injuries falling within this category are reportable to the local Environmental Health Officer (Enforcing Authority) on form F2508 via email. Any visiting Environmental Health officer must keep a copy of any forms used for inspection.

'Major Injuries' represent an injury resulting in broken bones (other than toes and digits) or any injury that results in a person being detained in hospital for a period greater than 24 hours. Injuries in this category are reportable under the RIDDOR regulations.

'Fatal Accidents' are reportable immediately to the Enforcing Authority under the terms of the RIDDOR regulations.

Accident Investigation

All reported accidents are investigated by the HSO with full support from the CEO at Colchester and OM at Haverhill.

Near Misses / Dangerous Occurrences

All Near Misses reported both at Colchester and Haverhill will be investigated by the HSO and concluded with recommendations for measures to prevent a reoccurrence.

The recommendations are then communicated by the HSO to the relevant line management who will ensure that they are implemented.

First Aid Treatments

All First Aid treatments will be recorded in the HS:AF:002 Accident Form; details of treatments will be supplied to the HSO who, together with the nominated first aider, will review such treatments in order to identify any trends for which counter measures could be applied.

Disabling Seven-Day Accidents

Disabling 'Seven-Day' accident reports will be sent to the CEO for Colchester and the OM for Haverhill as soon as it is practicable and will be subject of an immediate investigation. The HSO will report any disabling seven day accidents to the Enforcing Authority.

A full initial investigation will follow up by a more detailed investigation by the HSO who will inform all interested parties of the findings.

Major Accidents

In the event of a major accident, the CEO at Colchester and OM at Haverhill will be notified immediately. The HSO will ensure that the Enforcing Authority is promptly informed. A full Initial investigation of the Major Accident is carried out prior to disturbing any evidence or items that could have contributed to the cause of the accident. On completion of this investigation, a report of the findings, details of short and long-term actions, together with time scales required to prevent recurrence will be prepared.

Fatal Accident

In the event of a fatal accident, the area must be isolated and nothing interfered with, except by the Emergency Services or where action is required to protect others who may be at immediate risk.

The Enforcing Authority will be informed forthwith by the fastest practical means, by the CEO, OM or HSO or, in their absence, by the most senior person present. Tiron together with personnel throughout all levels of the Company's organisation will provide full co-operation to the Enforcing Authority representatives conducting any investigations.

3.20 First Aid

Tiron recognises that it has a legal responsibility under The Health and Safety First-Aid Regulations 1981 to provide adequate and appropriate first aid equipment, facilities and first aiders to ensure their employees receive immediate attention if they are injured or taken ill at work.

The Company provides adequate First Aid equipment and facilities at Colchester and Haverhill.

All First Aiders will be trained in First Aid at Work (FAW) by a competent first aid trainer – 3-day course and a refresher every three years.

Appointed persons can call the emergency services; drive the injured person to hospital with a first aider accompanying the injured person.

A first aider must be on site when out of hours working is planned.

For all accidents reported at Colchester and Haverhill, the HS: AF: 002-accident form to be completed by the first aider and the injured person.

The completed accident form will be passed to the Department Manager / Supervisor to investigate the accident using HS: AF: 003-investigation form. The HSO records all accidents on the EOE Safety Management System.

The HSO orders all first aid supplies required for Colchester and Haverhill.

3.22 Control of Working Time

The Company is committed to the principles of the Working Time Regulations.

No member of staff will be expected to work more than 48 hours per week (including overtime) unless there are exceptional circumstances.

Similarly all other requirements of the regulations e.g. in relation to breaks, night workers etc. will be complied with.

3.23 Electricity

Electrical Safety

Titon recognises its legal obligations under the Electricity at Work Regulations 1989 to protect employees and others from the hazards and subsequent risks relating to electricity. In order to discharge its responsibilities the Company has adopted the following policy:

Competent Persons

Persons employed on the installation, modification, maintenance or repair of electrical systems are competent, so as not to compromise their own Health and Safety or that of others, through training, experience, qualifications or a combination of those factors.

Persons not meeting the criteria described above are not permitted to work on electrical systems, unless directly supervised by a Competent Person.

Live Electrical Work

Where it is necessary to carry out work on live systems on and off site the following criteria will be applied:

- It is unreasonable in all circumstances for it to be dead
- It is reasonable for a person to be at work near it when it is live
- Suitable precautions including (where necessary) the provision of protective equipment are taken to prevent injury.

Risk Assessments

All tasks involving working on or adjacent to exposed live electrical conductors will be the subject of a work order. In compliance with the Company's Health and Safety Policy, control measures such as are required to reduce risk to an acceptable level will be put in place prior to the commencement of work.

Fixed Installation Inspections

All fixed wiring will be subject to regular inspection by an approved Competent Electrical Contractor. Deficiencies found because of the inspection will be recertified when necessary. When the inspection is completed, a Certificate of Compliance will be issued.

Inspections are carried out at approximately five-year intervals.

3.24 Audit

Health and Safety Audit

Titon has adopted the Organisational Arrangements, Policies and Procedures contained within this document, to ensure that all the standards are effectively applied.

The HSO will carry out In-house audits of the Health and Safety Standards and their effectiveness on the Company's sites. The audit will comprise of a review of the existing Health and Safety Policies and Procedures annually in order to ensure that they reflect current United Kingdom legal requirements.

On completion of the audit, the HSO will examine the Health and Safety related records and activities against the standards described in the appropriate Policies and Procedures.

A verbal report of the findings is sent to Department Managers at Colchester and Haverhill.

A comprehensive written report identifying any deficiencies, together with recommended actions required to achieve compliance will also be prepared and supplied to the Company.

3.25 Emergency Response

Emergency Actions

Policy

Titon recognises the need for efficient and speedy actions taken by appropriate trained employees in the event of an emergency.

Within their duties under the Management of Health and Safety at Work Regulations 1999, it is necessary that a structure exists for recording and updating contact information for all emergency services, with allocated tasks and training where necessary.

To meet these needs the Company has adopted the following:

Procedure

An up-to-date list of Emergency Contact telephone numbers will be kept in the Fire Emergency Log Books at Colchester and Haverhill.

The Emergency Contact List will include

- Fire Service
- Police
- Ambulance
- Taxi Service (with pre-arrangements for taking injured to hospital)
- Nearest Accident & Emergency Department
- Health & Safety Executive – for reporting major incidents (Health and Safety Poster)

If an evacuation is necessary, the procedures detailed in the Fire Precautions Section of this manual implemented and employees informed.

Once the Fire Brigade is on site, only they can give authority to re-enter the building.

3.26 Noise

Titon recognises its legal obligations to assess the hazards and risks associated with any operation or process that exposes employees to excess levels of noise. The Company will ensure that all such operations and processes meet the conditions laid down by the relevant statutory legislation such as the Management of Health and Safety at Work Regulations 1999 and the Control of Noise at Work Regulations 2005.

The exposure of employees to excessive levels of noise over long periods can cause hearing damage / loss. This damage can be in the form of any of the following:

- (a) Noise induced hearing loss (deafness), which can be of a temporary or permanent nature.
- (b) Ruptured eardrum.
- (c) Tinnitus ('ringing in the ears').

If a daily or weekly exposure level of 85 decibels or more is likely to be exceeded, the employer must make hearing protection available upon request and provide the employees and their representatives with suitable and sufficient information, instruction and training.

Areas at Haverhill with noise levels have a mandatory requirement to wear hearing protection.

Hearing protection and dispensers are provided in all areas in Haverhill where required. This will be shown by a sign, stating: "hearing protection must be worn" along with posters on how to place hearing protection correctly to protect hearing in the areas where hearing protection is mandatory.

MAKE UK completes the noise survey annually along with a noise survey report.

3.27 External Authorities

Liaison with Executive Authorities

Titon recognises that it must provide full co-operation with the Executive Authorities who are responsible for ensuring compliance with UK Health and Safety law. In order to maintain compliance with its legal obligations in this matter, the Company has adopted the following policy:

Access

The Health and Safety Executive (HSE) have a legal right to visit the premises any time. In the event of a visit:

- The CEO at Colchester and the OM at Haverhill must be informed of the visit immediately
- The HSE is to provide some form of identification
- The HSE may wish to carry out their inspection of the work place and they must not be in any way hindered

Interviews

The HSE has a legal right to interview any person they believe could assist with their enquiries. Staff are instructed that if interviewed they must answer any question to the best of their ability and honestly.

Actions the HSE May Take

The HSE may on the conclusion of their visit make verbal recommendations. Any employee present shall take note of the recommendations and request that the HSE send a written report to the CEO or OM.

The HSE may issue an improvement notice, which will record their concerns.

The improvement notice will contain four specific points:

1. The reason why the HSE does not believe that the business complies with regulations
2. The way legislation is not being met at Titon
3. The action required to put matters right
4. The time scale allowed for making the required improvements, (which will be at least 14 days)

Note: It is critical that the required standards are met within the given timescale, failing to do so could lead to prosecution.

Should the HSE have encountered a situation, practice or piece of equipment that presents an immediate significant risk to health and safety they may, during the course or at the conclusion of their visit, issue a Prohibition Notice.

3.28 New and Expectant Mothers

The Health and Safety at Work Act 1974 requires employers to secure the health and safety of all employees at work, and anyone else who may be adversely affected by the employer's undertaking, so far as is reasonably practicable.

The Management of Health and Safety at Work Regulations 1999 require employers to assess work-related risk of all their employees, and require specific assessment of risks to new and expectant mothers.

New and expectant mothers must let their Department Manager or Supervisor know about their condition as soon as possible, bearing in mind that certain risks to their unborn child may be relatively higher at the earlier stages of pregnancy.

Department Managers / Supervisor who become aware that one of their staff are a new or expectant mother should inform the HSO who will undertake a Risk Assessment and place steps to remove any

risk to the pregnant or new mother.

Pregnancy is a condition that need not necessarily present specific risks at work, regarding health and safety.

3.29 Health and Safety Information

Copies of the Health and Safety Poster are displayed in each separate building at Colchester and Haverhill.

3.30 Construction, Design and Management (CDM)

Titon recognises its legal obligations to notify the enforcing authority and to appoint competent persons as required under the Construction (Design & Management) (C.D.M.) Regulations 2015.

The regulations apply to, and in relation to construction work. These duties shall apply only where a project:

- (a) is notifiable
- (b) is carried out for and on behalf of, or by, a client

Construction work means the carrying out of any building, civil engineering or engineering construction work as defined under the Regulations.

Under these Regulations, a project is notifiable if the construction phase is likely to involve more than:

- 30 working days and on which at some point more than 20 workers are working simultaneously or
- 500 person days of construction work

Under these Regulations Titon will appoint the necessary key competent personnel and notify the authorities as and when necessary.

Principal Contractor

The Principal Contractor will plan, manage, monitor and coordinate health and safety in the construction phase or project by the following;

- Liaising with Titon and the principal designer
- Preparing the construction phase plan
- Organising cooperation between contractors and coordinating their work
- Ensure suitable site inductions are provided
- Workers are consulted and engaged in securing their health and safety
- Welfare facilities are provided.

Principal Designers

The Principal Designer appointed by the client in projects involving more than one contractor. They can be an organisation or an individual with sufficient knowledge, experience and the ability to carry out the role. They will carry out the following functions:

- Identifying, eliminating or controlling foreseeable risks
- Ensuring designers carry out their duties
- Prepare and provide relevant information to other duty holders
- Provide relevant information to the principal contractor to help them plan, manage, monitor and coordinate health and safety in the construction phase.

Procedure for Contractors contracted to work

- A new contractor will be sent the Titon contractors' questionnaire and the Titon contractor hand-book rules by the HSO for the contractor to complete before any work commences

- The new contractor will return the completed questionnaire and signed handbook along with the work risk assessment, method statement and liability insurance (“Rams”) required for the work they are contracted to do at Titon, to the HSO
- The HSO checks all the documents from the contractor and enters the data to the EOE safety management system. All records are held in the Health & Safety office
- All Contractors Rams must be sent prior to any contracted work. If the contractor does not send any of the Rams then the contracted work cannot start
- All Contractors must have an appointment before coming on site to do any contracted work
- All Contractors must sign in at reception and have a Company health & safety induction prior to any contracted work, then continue to have a yearly health & safety induction
- All Contractors must have the relevant permit to work
- Contractors must use their own tools and equipment contracted to the work required. Tools / equipment and fork trucks belonging to Titon must not be used under any circumstances, unless authorised by the Company
- All Contractors must be monitored whilst working on site
- Any member of staff who judges there is a risk where contractors are working, should inform their Manager immediately
- The Managers are responsible for their contractor and will monitor their Health and Safety whilst on site
- Contractors must also observe the Company's Fire Safety Procedure

3.31 Power Presses

Titon recognises its legal obligations under the Provision and Use of Work Equipment Regulations 1998 as applied to Power Presses to protect employees and others from the hazards and subsequent risks relating to their safe use. In order to discharge its responsibilities the Company has adopted the following policy:

Power Presses are among the most dangerous machines used in industry. Amputation or serious injury usually results from accidents caused by trapping body parts between tools of a power press.

Training

Titon will provide training for persons appointed under the regulation 33(1) to inspect Power Presses, which includes suitable and sufficient practical instruction in the following;

- Power Press mechanisms, particularly their safety aspects and including the nature and function of clutch mechanisms, flywheels, brakes
- Guards and protection devices – types of functions of each type of guard or protection device
- The causes and prevention of accidents involving power presses
- The work of the tool setter – safer methods of working, lubrication and co-operation with the press operator
- How to carry out an inspection and test of the guard protection device or closed tool, including how to detect defects
- Novice Power Press training is a 2 day course
- Refresher training is a 1 day course, every 3 years
- Sign off of the guard's protections are secured using the pre-safety inspection cards
- All persons completing their Power Press training will be issued a certificate from the competent trainer and added to the Power Press Register

Setting

Designated persons who carry out setting, re-setting and adjustment or testing tools.

A person undergoing training to become a setter may carry out the work providing they are acting under the immediate supervision of a person already designated.

Before people are allowed to carry out setting duties on their own, checks will be made that they;

- Have been adequately trained
- Are competent to carry out the duties
- Have been specifically designated
- Added to the Power Press register

This is for every power press, guard and protection device they will work on

Power Press Register

All persons completing their Power Press training including Setters will be added to the Power Press Register and the Director at Haverhill will sign the register.

The Power Press Register is kept in the Health & Safety Office.

Maintenance

Planned preventive maintenance 6 monthly.

Power presses thoroughly examined by a competent person.