

# OT Group Limited

Part of Paragon Group

## OT Group Health and Safety Policy

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Introduction

In compliance with the requirement of Section 2 of the Health and Safety at Work Act 1974, OT Group Limited are effectively discharging their statutory duties by preparing a written Health and Safety Policy. A copy of the policy and associated employee handbook, which outline our health and safety arrangements and organisational structure, are held at OT Group Limited’s main place of business.

The health and safety policy and management system requires constant monitoring by OT Group Limited’s management and reviewed particularly following changes to the business and following accidents or incidents to ensure continual legal compliance. In order for OT Group Limited to discharge its statutory duties, employees are required by law, to co-operate with management in all matters concerning the health, safety and welfare of themselves and any other person who may be affected by their acts or omissions whilst at work. OT Limited encourages all employees to inform management of any areas of the health and safety policy that they feel are inadequate or misrepresented to ensure that the policy is maintained as a true working document.

## Quality, Health, Safety and Environmental Policy Statement

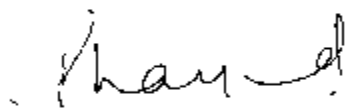
The OT Group Limited (OTG) Quality, Health, Safety and Environmental (QHSE) Policy statement covers all our operations within the UK and the Republic of Ireland. OTG Directors are committed to ensuring, so far as it is reasonably practicable, the health and safety of all our employees as well as those not directly employed by us but who may be affected by the Company's operations (e.g. Contractors, visitors and members of the public).

OTG a wholesaler and a distributor of office products aims to lead its chosen sector of industry through excellence in Customer service. A key platform in meeting this vision is to provide industry-leading levels of service and we will operate the current ISO9001 and ISO14001 standards for both Quality and Environmental management systems across all sites to achieve this.

QHSE is to be stressed in everything we do in the Company, from initial sales enquiries and orders, to delivery and invoicing. It is a mandatory requirement that all personnel involved comply with applicable legislation, policies, systems and procedures. QHSE is afforded the same degree of attention as all other areas of our operations. Our vision is one of 'Zero Accidents' and 'Environmental Consideration' in all aspects of its operations, in order to achieve this vision I believe in the following principles and commitments:

- Senior Managers will have the resources to improve and uphold standards in order for us to progress towards our vision of 'Zero Accidents' and "A Responsible approach to the Environment"
- Senior Managers are expected to lead by example and demonstrate their commitment to QHSE matters at all times.
- We will ensure that we meet the needs and requirements of our customers and engage with all key stakeholders including suppliers to continually improve the quality of the products and services we provide.
- All levels of Management and Supervision have accepted their duty towards QHSE as a prime responsibility and will ensure the involvement of all our employees in the task using their ideas and experience to achieve safe working practices and to ensure the highest possible level of health and safety.
- We will ensure that arrangements exist for identifying, eliminating, minimising and controlling health, safety and environmental hazards, such as the conservation of energy and the prevention of pollution.
- We will provide such training and education as is necessary to establish healthy and safe working attitudes and practices, along with conservation of natural resources used in our operations, particularly in the use of packaging. Where reasonably practicable we will consider sustainable alternatives for all business processes
- Compliance with the law and the requirements of our Management systems is a minimum. Our standards whether they relate to behaviour, processes or plant and equipment will meet these requirements first but will extend to a point where we meet our vision of 'Zero Accidents' and "A Responsible approach to the Environment"
- Strive to continually improve and enhance its performance by monitoring and measuring and setting objectives and targets, which are continually reviewed to ensure they are understood, acted upon and met. Objectives shall be established and reviewed by the Company Secretary at Management Review Meetings or at any stage with reference to the Group Quality and Environmental Systems Manager or Health and Safety Manager.
- Efficient management of fleet vehicles to reduce or control, wherever possible, vehicle emissions. Emissions from solvents, dust and noise produced by our processes will be reduced as low as is reasonably practicable.

It is a legal requirement for all our employees to be responsible for taking care of themselves and other persons who may be affected by their acts or omissions at work. We have a zero tolerance policy in relation to employees neglecting their QHSE obligation. This Policy will be reviewed on a periodic basis and was endorsed by me, Pippa Maynard, the Company Secretary for OTG.

A handwritten signature in black ink, appearing to read 'Pippa Maynard', written in a cursive style.

Pippa Maynard, Company Secretary

## Organisation

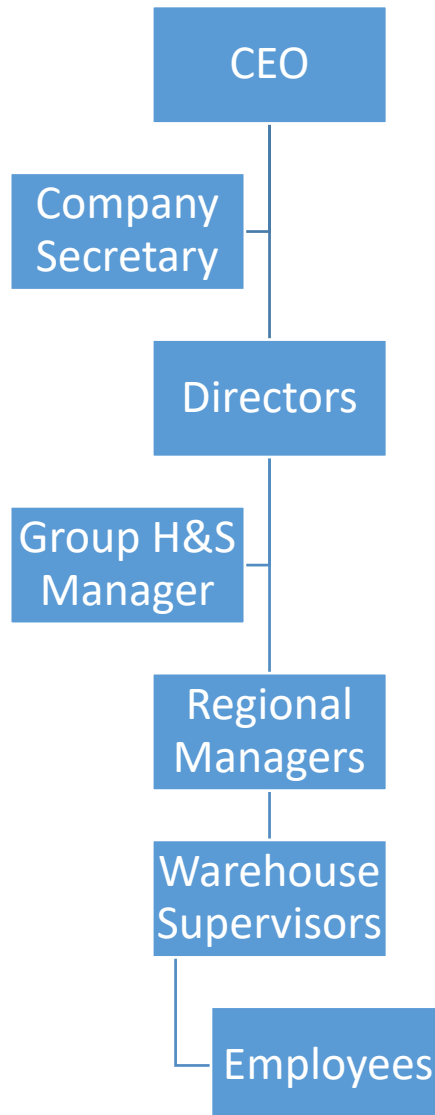
### Safety management structure

#### Nominated responsibilities

- The CEO
- Directors
- Operations Managers
- Warehouse Supervisors
- Group Health and Safety Manager

#### General responsibilities

- Employees
- Employers
- Sub-contractors and the self employed



## Health, Safety and Environmental responsibilities

The executive team report directly to the Chief Executive Officer. The responsibilities of particular individuals are set out below.

### **Chief Executive Officer**

The Chief Executive is ultimately responsible for the overall running of the Group, including health, safety and environmental matters. It is the Chief Executive's responsibility to oversee the line management arrangements to ensure that sufficient time and resources are given to line managers to fulfil their functions. Additionally, 'Health, Safety and Environmental Matters' is to be a standing board meeting agenda item.

### **Directors**

The Directors are responsible for the overall implementation of the policy in their own sections of the Group. It is the responsibility of the Directors to report the performance of their areas to the Board and to ensure that their managers are implementing the health, safety and environmental policies and their objectives. Additionally, they must ensure that all line management in their sections are competent and committed to the management of health, safety and environmental matters and to provide training and communication for all staff.

### **Managers**

The Managers have day-to-day responsibility in their sections of the Group for health, safety and environmental matters. It is to be managed in parallel with day to day operational and quality issues. In particular, these managers should: ensure that all new and re-assigned employees receive an appropriate induction training programme, including fire evacuation procedures and specific job training related to the risks likely to be encountered in their section of the business. To carry out/review risk assessments in conjunction with the safety team, promote and ensure compliance with safe working practices developed within the risk assessment process (including general risk assessments, COSHH, Manual Handling, etc.), ensure good housekeeping standards are maintained and carry out accident/incident/ill health investigations in their section in accordance with the laid down procedures. Where required notify, manage and supervise contractors in accordance with the Contractors Procedure and minimise waste and use of energy in accordance with the OTG Environmental Policy.

### **Supervisors/Team Leaders**

The Supervisors/Team Leaders will manage health, safety and environmental matters as part of their day to day duties. In particular, they will:

- deliver aspects of induction training as outlined in the Employee Information Pack
- deliver existing employee training/retraining
- assist in the risk assessment process
- promote and ensure compliance with safe working practices
- ensure good housekeeping standards are maintained
- fulfil their duties in the accident/incident/ill health reporting procedure
- oversee weekly/daily machinery and personal protective equipment (PPE) checks
- Minimise waste and use of energy in the premises.

## **Employees**

All employees have the responsibility to co-operate with supervisors and managers to achieve a healthy, safe and environmentally friendly workplace and must take reasonable care of themselves and others. Wherever an employee notices a health, safety or environmental problem that they are unable to put right, they must immediately inform their line manager. In addition, if an employee has any other concern relating to health, safety or welfare, these concerns must be reported to the persons named on the Health and Safety Law poster. Employees may, however, if dissatisfied with the result of discussion about their concerns, report it in writing to their relevant director or the Health, Safety and Environmental Committee. Employees must also be aware of their legal obligations under Sections 7 and 8 of the Health and Safety at Work etc. Act 1974. These require employees to take reasonable care of themselves and others and to not recklessly interfere with anything provided in the interests of health and safety.

## **Employers**

Employers have a duty to employees, casual workers, part time workers, trainees, visitors and subcontractors. Consideration will also be given to our neighbours and the general public. OTG management will ensure that equipment is fit for purpose and suitably maintained and adequate training and information is provided to all employees. Provisions will be implemented to ensure articles and substances hazardous to health are handled and used in the proper manner and health surveillance will be available where deemed necessary.

## **Health and Safety Manager**

The Group Health and Safety Manager will act as the competent Person under the Management of Health and Safety at Work Regulations 1999. The Competent Person will act as adviser to aid line managers in the management of health, safety and environmental issues, reporting to the Group Company Secretary and Group Operations Director. The Group Company Secretary and Group Operations Director will report performance to the Board and arrange a yearly review of the Health, Safety and Environmental Policy.

## **Health, Safety and Environmental Committee**

This meeting will be called by the Group Company Secretary and Group Operations Director on a six monthly basis, with the purpose of monitoring the Group's performance. In particular, it will review the risk assessment programme being carried out by the safety teams and individual departments monitoring of performance. It will also review the ongoing monitoring and auditing programme.

## **Local Safety Teams**

The Group is divided into areas, each with its own safety team. Each safety team chair is responsible for calling meetings on at least a three monthly basis and ensuring that copies of minutes of these meetings are forwarded to the Competent Person. The primary function is to continually improve standards by carrying out the risk assessment programme and by monitoring conditions. Such meetings may form part of local management meetings, i.e. Regional Operations Meetings/Sales Meetings but must be a separate agenda item with minutes being provided to the Competent Person(s).

## **Equipment Maintenance**

It is imperative that plant and equipment is adequately maintained to ensure that it is in safe working condition. To ensure that these important activities are undertaken appropriately, maintenance of all equipment will be under the control of the Director or Manager responsible for the department.

## Arrangements

### Access and egress

Safe access and egress includes movement of persons, equipment and vehicles into, around and out of the place of work. Arrangements will be made to ensure pedestrian and vehicle segregation is implemented where possible. Articles and substances will not impose safe access and egress in the premises and that objects that may restrict safe movement are removed immediately. Access and egress will be addressed through the risk assessment process and will be dealt with at a site specific level.

### Accident reporting

All accidents will be recorded on the internal Accident/Incident Reporting form at each location, and forwarded to HR Department immediately. Dependant of the severity of the accident / incident will determine the seniority of personnel involved in the investigation. The Group's trained first aiders are listed on all notice boards. An appointed person is responsible for the first aid boxes on each site. Line Managers are responsible for the reporting of all accidents, incidents and near misses to HR Department. HR Department is responsible for ensuring that all 'reportable accidents' are reported to the HSE upon receipt of a completed F2508 form. All accidents, incidents and near misses will be investigated by line management and appropriate action taken to ensure the root cause is eliminated. Staff will be trained in accident investigation to support root cause analysis and the implementation of corrective actions to ensure the accident doesn't reoccur. Major findings will be communicated to all other sites to ensure we do not experience repeat incidents on multiple sites.

### Alcohol and drugs misuse

There is evidence that the effects of drinking or drug use or abuse can reduce personal performance and potentially increase absence rates. In jobs where safety is paramount, such as the transport industry, any form of drug or alcohol related problem is a very serious matter and in some circumstances may be a criminal offence. The scope of this policy extends to alcohol, illicit drugs or substances and over-the-counter or prescription medication if abused or taken in an irresponsible manner. OTG will seek to identify problems at an early stage and thus minimise the risk posed to the health and safety of employees and others. Ensure that appropriate arrangements are in place to minimise the likelihood of alcohol, drugs and substance abuse occurring. Recognise that drug and alcohol problems are medical conditions that are potentially treatable. Treat all information in the strictest of confidence. If an alcohol or drug related problem comes to light that results in unacceptable behaviour or performance it may be dealt with in accordance with our disciplinary or capability procedures. Behaviour or performance which is found to be unacceptable and related to alcohol or drug abuse, may, depending on the circumstances of the individual case, result in summary dismissal.

### Asbestos

Some of the sites were built pre 2000 and are therefore assumed asbestos unless an asbestos report is available to confirm it is not present. For sites which are built prior to 2000 we will ensure as asbestos survey has been completed. Site managers will make staff aware of its presence through awareness training. No alterations work will be permitted on site containing asbestos without the prior approval of the Group Health and Safety Manager. This is to ensure we do not knowingly disturb asbestos or permit works that are covered under licenced or notifiable to the HSE. Each site containing asbestos will have an asbestos folder and management plan outlining where the asbestos is located, this must be signed by every contractor prior to work commencing. Six monthly assessments of the condition of the asbestos will be carried out, where deterioration is observed a decision will be made as to the most appropriate control measure whether that be to encapsulate or removal.



## Construction, design and management (CDM) responsibilities

The Construction (Design and Management) Regulations (CDM) cover a very broad range of construction activities such as building, civil engineering, engineering construction work, demolition, site preparation, site clearance, renovation, decoration, installation, maintenance, and dismantling of structures. Under the CDM Regulations, legal duties apply to clients, designers, and contractors for all construction projects even for simple, short duration work. However, for those projects that are likely to take more than 30 days or involve more than 500 person days of construction work, additional management duties are imposed and projects are notifiable to the regulators. OTG will appoint appropriately trained and skilled individuals for significant CDM projects to ensure compliance.

## Compressed air

A compressed air supply, either from a cylinder or from a compressor must be treated with respect. It must never be used for blowing dust or swarf from clothing, skin or glassware or for ventilation purposes. It is particularly dangerous to direct a jet of compressed air at the body as this may introduce air into the bloodstream, produce serious eye injury, or cause a burst eardrum. Pipe connections must be appropriate for high-pressure work, standard worm driven hose clips are not acceptable for this purpose. OTG will ensure each site with a pressure vessel has a schedule of inspection and test in place and ensures this is adhered to.

## Contractors

A contractor is anyone who is undertaking work on our behalf but is not a direct employee. Contractors may be employed to undertake maintenance, repairs, installation, construction, window cleaning, engineering and many other jobs. Health and safety responsibilities are defined by criminal law and cannot be passed on to another by a contract. Thus, in any client/contractor relationship, both parties will have duties under health and safety law. No-one will be allowed on any OTG premises unless authorised by a Manager who will be responsible for their safety arrangements while on the premises. Before a contractor is allowed to start work on the premises, the manager responsible for engaging the contractor will agree with the contractor a safe system of work, which will ensure the safety of the contractor's employees and this Group's staff, in accordance with our Contractor Agreement. The Manager will also check that the agreed safe system of work is adhered to once work starts. Contractors must have their works approved and have left the site as it was found in a safe condition ensuring all debris and tools have been removed.

## Control of Substances Hazardous to Health

Safety data sheets (SDS) for all materials will be obtained from suppliers prior to materials being brought onto site. The risks associated with hazardous materials will be assessed and safe systems laid down for the use of all such materials. Staff will be trained to use the materials and appropriate protective clothing will be provided as necessary. Documents relating to these assessments will be located in each departmental manager's office. SDS's for products sold will be available on our website. All new materials will be subject to assessment for potential hazards and a safe system established before they are used. Contractors working on our sites will be required to provide copies of SDS and CoSHH assessments for any chemical stored or used as part of their works. Under no circumstances must a chemical be stored in a container that does not display the appropriate warnings and labels identified by the SDS. Labels and other forms of warnings must not be defaced, removed or covered by packaging. If the hazard label is covered, defaced or damaged a hazard label must be displayed on the outer packaging.

## Disciplinary rules

OT Group Limited believes health and safety is a critical factor that needs to be taken into account when running a business. To enable the company to control safety, a number of safety rules have been established. Failure to comply with these rules may result in disciplinary action.

## Display Screen Equipment (DSE)

DSE users can experience a range of different physical and psychological health problems including eyestrain, blurred vision, headaches, and musculoskeletal problems including repetitive strain injury (RSI) and work related upper limb disorders (WRULD). Problems are caused by a combination of badly designed jobs, equipment and work environment. OTG will carry out DSE assessments and implement corrective actions where necessary for all identified DSE users. A user is defined as somebody who is required to use DSE equipment for a significant part of their working day. DSE assessments and training will be completed online using the British Safety Councils Platform.

## Electricity

The safe management of electrical installation and equipment is essential to our business. It is therefore imperative that electrical systems and equipment are designed, constructed, maintained and used with care. OTG will not permit anyone without the relevant competence and qualifications from the Institute of Electrical Engineers (IEE) to work on any electrical installation or equipment. OTG will maintain their installations in accordance with the IEE wiring regulations. This will include 5 yearly fixed wire testing and testing of portable appliances as per the written schedule of test. Defective equipment and installations following inspections will be repaired as per the recommendations or otherwise removed from use. Under no circumstances will any makeshift or temporary electrical repairs be made on any electrical equipment.

## Epilepsy

Epilepsy is defined as having repeated seizures, which start in the brain. A brief disturbance to the brain's normal electrical activity causes the nerve cells to fire off random signals. The result is like an electrical storm that causes a temporary overload in the brain. There are many different kinds of seizure. Some end in seconds while others may last several minutes. People affected might lose awareness of what is happening or where they are during a seizure and they may lose consciousness altogether. Each person's experience of epilepsy is unique. OTG is aware that people who are epileptic may not wish to reveal their health problem. However, workplace adjustments can only be made if the individual is willing to let their employer know about the disability. OTG will treat each individual with epilepsy on a case by case basis, consideration will be made based on the employee's job and individual risks. OTG will do whatever is the safest for the employee regardless of what that outcome maybe.

## Fire

Fire prevention is an important obligation for all businesses. OTG has a responsibility for ensuring the health, safety and welfare of all employees and others who may have access to the workplace as well as adjoining businesses or premises. These general duties include safety in relation to fire hazards, both from the work processes and activities, as well as general fire safety in the workplace. It is the policy of OTG to ensure that all employees, visitors, relevant persons and contractors are protected from the risks of fire. In order to achieve this, appropriate fire prevention, precautionary and evacuation measures shall be taken in compliance with the relevant fire legislation and recognised good practice standards. Training will be delivered to all staff of fire awareness, specific fire marshal training will be delivered to key individuals to ensure safe egress during the fire. OTG does not expect employees to fight fires, however, extinguishing

action can be undertaken if it is safe to do so and the employee has been trained. Under no circumstances should a closed room be opened to fight a fire.

### First aid

People at work can sustain an injury or become ill, it is important that they receive immediate attention and that an ambulance is called in serious situations. OTG will ensure the provision of adequate first aid cover on all sites across all shifts, these will be either appointed persons or First Aid at Work trained individuals. First aid equipment will be appropriate to the number of people on site and the associated risk. Where employees operate from a specific vehicle a first aid kit will be allocated to the vehicle, not the individual. The contents of this will be checked on an annual basis.

### Forklift trucks

A range of Forklift trucks (FLT's) are used across the OTG sites to manoeuvre palletised goods. In most scenarios these will be electric however, gas or diesel powered truck may be used from time to time. The trucks used on OTG sites have been selected to suit the environment and task following consultation with the equipment provider. All FLT's will be inspected as per the schedule of inspection and test set out by the lifting operations and lifting equipment regulations by competent engineers. No person shall be permitted the use of any FLT without receiving sufficient training and instruction, training will be delivered by competent persons at appropriate intervals. A FLT pre use check sheet will be completed daily to support reporting of issues to management. OTG will retrain MHE licences every 3 years in line with the ACOP.

### Hazard reporting

OTG accept that some of their activities could, unless properly controlled, create hazards to employees and other people. To reduce the likelihood of injury or loss we will take all responsible steps to reduce the risks to an acceptable levels. Consequently, OTG will inform employees of likely hazards by means of risk assessment, information, instruction training and documentation. To aid the recording of hazard and near miss reporting OTG have implemented a reporting procedure. By encouraging employees to report all incidents, near misses and hazards should lead to a safer working environment. In turn this should improve the safety culture and attitude of the workforce towards safety. It is the duty of senior employees to assess the situation and introduce the necessary control measures, so far as is reasonably practicable, to prevent injury or unsafe conditions.

### Health surveillance

Health surveillance is conducted by observation, communication and systematically watching for early signs of work-related ill health. Health surveillance is essential if there is an identifiable disease or adverse health effect which is related to the employees' exposure to a health risk, and a risk assessment has identified as having a reasonable likelihood of occurring under the particular work conditions involved.

Health surveillance records will be kept for forty years and include: -

- Surname and forename.
- Permanent address.
- Sex.
- Date of birth.
- National Insurance Number.
- Date of commencement of present employment.
- A historical record of jobs involving exposure to the hazardous substances requiring the health surveillance.

#### Associated hazards

- Noise.
- Dusts and other hazardous substances.
- Dermatitis.
- Asthma.
- Asbestos or work with compressed air.
- Driving.

#### Employer's responsibilities

OTG will carry out a risk assessment to identify the health hazards within the workplace and communicate the findings to employees. Following this take any necessary measures to remedy any risks found as a result of the assessment. All new staff are included in health surveillance programmes and staff transferring to different work activities are included in the health surveillance programme if required. All employees will receive relevant information and training regarding the hazards they are exposed to. The results of health surveillance will be communicated to relevant employees and their personal files updated appropriately. HR will monitor sickness absence referring employees to management if the reason for absence is thought to be work-related. OTG will provide personal protective equipment where required and continue to monitor and review the effectiveness of the arrangements to ensure ALARP is maintained at all times.

Employees must co-operate with on matters of health and safety. If an employee has a concern about their health and safety, that of others affected by their work or encounters symptoms of ill health, they must inform their manager immediately.

#### Housekeeping

All areas will be cleaned daily and waste cleared from production areas daily. Materials will be stacked at safe heights in the allocated areas. Freestanding pallets will be stacked to a maximum of 3 pallets high, except where the arrangement is such that the pallets could not fall onto a work area or gangway, where, exceptionally, 4 high stacking will be accepted. All gangways and exits will be marked and kept clear. Poor standards of housekeeping are a common cause of injury and damage at work and can create possible fire hazards. Unsatisfactory housekeeping is often the result of poor working practices, lack of direct supervision and/or organisational deficiencies within the workplace. OTG will carry out a risk assessment in relation to housekeeping within the company and introduce control measures as appropriate. Implement steps for the maintenance, cleaning and repair of the premises. Train employees to be aware of their responsibilities for ensuring that hazards are not created from their work or equipment.

#### Information, instruction and training

All new employees will be given appropriate safety induction training. The relevant Manager will deal with essential elements on the first day of employment, with more in depth training being provided on the job throughout the training phase. In addition, employees will be properly trained to carry out the specific responsibilities of their own individual job. The programme of training for each new employee will be set down by that employee's manager and be delivered by a manager or supervisor/team leader. Preventing accidents and ill health caused by work is a key priority for OTG. Health and safety information, instruction and training helps the company to ensure our employees are not injured or made ill by the work they do; promotes a positive safety culture, where safe and healthy working becomes second nature to everyone; and enables the company to meet its legal duty to protect the health and safety of our employees. Training isn't just about formal "classroom" courses. OTG will provide the necessary training, taking into account the capabilities, previous training, knowledge and experience of employees. Ensure that the demands of the job do not exceed the employees' ability to carry out their work without risks to themselves and others. Prioritise information, instruction and training to ensure that any high risk needs are met first. Determine the most suitable method for delivery of the information, instruction and training, including the use of

internal and external providers. OTG will document and maintain records of all information, instruction and training provided for a minimum of 5 years.

### Ladders and Stepladders

Where possible the use of ladders will be eliminated through alternative safer methods, where this is not possible safe systems of work will be implemented to determine that ladder use is acceptable for work of short duration (between 15 and 30 minutes) and low risk, providing three points of contact can be maintained whilst working from the ladder or steps. Ladder training will be delivered to all frequent ladder users, ladders will be subject to inspection prior to use by each individual. It is the responsibility of site managers to ensure safe work equipment is provided at all times. Maintain a records system, which identifies each ladder and logs each inspection, repair and maintenance procedure undertaken. Ensure ladders are stored in a way that does not lead to warping, defects or reduction in strength. Implement a reporting system, so that any concerns, problems, risks or defects encountered while using the ladders can be reported to a responsible person and the appropriate action taken.

### Lighting

Providing adequate lighting levels to enable people to work is a basic necessity. Good lighting that considers physiological and psychological needs of employees will create a work environment that is welcoming, energising and productive. To safeguard employees and visitors from the potential hazards presented by inadequate lighting, OTG Limited will, ensure that work is carried out by natural light wherever possible. Take precautions against glare and ensure that lights are positioned to avoid risks to health and safety. Where necessary supplementary lighting will be provided. OTG will adhere to the following recommended standards: -

- Outdoor lighting, especially where personal security is an issue - 20 lux, constantly maintained.
- Loading bays and outdoor work areas - 50 lux.
- Work requiring limited perception of detail - 100 lux.
- Local lighting at individual workstations - 200-500 lux with no sources of glare (i.e. direct sunlight, unshaded light-bulbs etc).
- Staircases and escalators - 300 lux, lit to provide good contrast between the treads and risers of the steps.
- Cellars and storerooms – 300 lux
- Crossing points on traffic routes – 300 lux, constantly maintained.

Emergency lighting is required to illuminate escape routes in an emergency evacuation, or to allow continued working or help evacuation of areas deficient in natural light, should the normal lighting fail. Escape lighting should come on within five seconds of the failure of normal lighting, and provide at least 1-lux luminance at floor level. The area immediately outside the final exit should be illuminated, to help dispersal of those leaving the premises in a hurry during night time hours

### Lone working

Lone workers can be anyone who works by his/herself without direct contact or supervision. OTG realise that there may be concerns surrounding lone working, to allay these fears we will, make a suitable and sufficient assessment of the risk to the health and safety of these employees and others who may be affected. Identify the preventative and protective measures needed, so far as is reasonably practicable. Ensure that mechanisms are in place to account for and trace the whereabouts of employees who work alone and that these systems are regularly checked. Check that lone workers have no medical conditions, which make them unsuitable for working alone.

## Manual handling

Manual handling injuries can occur wherever people are at work. Manual labour, awkward postures, manual materials handling and previous or existing injury are all risk factors implicated in the development of manual handling injuries. Manual handling is defined as the supporting and transporting of a load by human effort and includes lifting, lowering, pushing, pulling or carrying. OTG will ensure that, manual handling operations that present a risk of injury are identified. Handling operations which present a risk of injury are avoided, so far as is reasonably practicable, by eliminating the need for the load to be moved or by the introduction of automation or mechanisation. Those operations that cannot be avoided are assessed using an ergonomic approach that considers the Task, Individual capacity, Load and Environment (TILE) elements to determine the level of risk.

Incidents that result in musculoskeletal injury to staff are fully investigated and risk assessments and systems of work are reviewed in the light of such incidents. Staff recruited to posts involving manual handling are suitable for the work they are required to undertake, that job descriptions sent to applicants for employment include details of manual handling tasks where these are part of requirement of the post, and that staff in post continue to be suitable for the work. Suitable information, training and supervision is provided for all employees engaged in manual handling tasks and that such training is recorded, monitored, evaluated and reviewed. Premises outside the regular workplace at which employees may have to perform manual handling operations are taken into consideration when undertaking a manual handling assessment. Employees are instructed not undertake any manual handling operation that they believe is beyond their capability and to report any unsafe systems of work to the employer.

## Machinery

Machines will only be operated by those trained and authorised to do so. Before a machine is used, the operator must check that guards are in place and in working order. The following special items of plant and equipment will be checked at the appropriate intervals:

- Lifts 6 monthly (by external contractor) weekly (by manager)
- Fork Lift Trucks 6 monthly (by external contractor) weekly (by manager) daily (by operator)
- Guillotines 6 monthly (by external contractor)
- Pressure systems in accordance with the written scheme of examination laid down and held the unit manager Access equipment will be inspected every six months. It is the responsibility of the departmental managers to arrange for this to occur on their own access equipment.
- All new machinery will be assessed for adequate guarding before it is put into use.

## Monitoring, inspection and review

There is a legal requirement to monitor and review health and safety arrangements. OTG ensure the Health and Safety Policy, control measures stated in risk assessments and safe systems of work are followed. Inspections and testing of work equipment is completed as per their schedule of test. Prepare and implement a plan for regular monitoring and inspection of health and safety arrangements. Monitor employee's health requirements and fitness to work, where applicable, e.g. eye tests, effects of noise and vibration, general fitness etc., as required by risk assessment. Regularly check employee and contractor competence during work activities to ensure they are working safely and are following the requirements of the employee handbooks and instructions Review risk assessments at least annually, or where there has been a significant change in tasks, premises layout, equipment or personnel. Gather and analyse data about injuries, cases of ill health and incidents with the potential to cause injury, ill health or loss. The data collected will be used to ensure the H&S strategy is suitable focused and directed to eliminate repeat accidents.

## New and expectant mothers

Pregnancy is not an illness and whilst it is important to realise that there is a natural incidence of problems for the new and expectant mother and for her child, it is known that their health may be affected by external

workplace factors. OTG are committed to protecting the health and safety of all new and expectant mothers. To safeguard the health and safety of new and expecting mothers, OTG will: -

- Carry out a risk assessment to identify any actions that need to be addressed or implemented to ensure a safe working environment for new or expectant mothers. The risk assessment will be ongoing to take into account the possible risks that may occur at different stages of the pregnancy.
- Ensure that all practical measures will be taken to minimise exposure to chemicals and other potentially harmful agents.
- Consider the possible or adverse effects to the new or expectant mother and her unborn child during the assessment of risks posed by workplace conditions. These assessments will be made available to the relevant employees.
- Request that employees report to the employer as soon as pregnancy is suspected so that any necessary advice can be given.
- Provide appropriate facilities for expectant and breastfeeding mothers to rest e.g. rest room equipped with a comfortable chair.

In spite of all practicable measures being taken, if the employer considers that there is an unacceptable reproductive risk to a new or expectant mother, the company will take all reasonably practicable steps to find employment for her. If satisfactory alternative employment cannot be found, the employee will be medically suspended from employment in accordance with the terms of the Employment Rights Act. OTG support a woman's right to breastfeed her baby for as long as she wants to. Under the EC Directive on Pregnant Workers and subsequent Health and Safety at Work Regulations we have a responsibility to protect the safety and health at work of pregnant workers and workers who have recently given birth or are breastfeeding. The company will also: -

- Take positive and supportive attitudes to employees returning to work and breastfeeding.
- Make available information about breastfeeding for pregnant employees.
- Wherever possible, allow appropriate flexibility in working hours, including regular breaks for employees who wish to breastfeed or to express milk.
- Ensure there is a clean, private area available with a dedicated refrigerator, for the use of breastfeeding employees.
- To make use of this protection, women must notify their employer in writing that they are breastfeeding.

## Noise

Noise will be reduced as far as is reasonably practicable. Noisy areas will be marked appropriately and staff working in those areas informed of the dangers and issued with appropriate hearing protection devices. Before new machinery is purchased, suppliers must agree what noise level it will emit under normal use. The actual noise level will be checked upon installation. A noise risk assessment will be undertaken annually or sooner should the introduction of new equipment of significant changes require so, to ensure that the appropriate controls are in place and are suitable.

## Personal protective equipment

Protective clothing will be issued where the risk assessments indicate it is appropriate for the work carried out, and **must** be worn. Staff should immediately report its loss or significant wear to their supervisor. Staff will be trained to use and maintain this equipment. Should an employee refuse to wear the protective items issued, this will be deemed gross misconduct. Staff not on our payroll, e.g. supplied by agencies, must come equipped with PPE if required for their work. OTG will provide protective equipment when the risk presented by a work activity cannot be adequately controlled by other means. All reasonable steps will be taken to secure the health and safety of employees who use PPE. It is the intention of the company to ensure, through the proper use of PPE, that any risks are reduced to a minimum. Whilst it is generally recognised that the use of PPE can be undertaken without undue risks to health, it is appreciated that some employees may have genuine reservations and concerns OTG will seek to give information and training to enable a fuller

understanding of these issues. The implementation of this policy requires the total co-operation of all members of management and staff. There will be full consultation with employee representatives through existing channels of communication.

### Portable electrical appliances

Portable electrical appliances are found in most workplaces and include power tools, portable lighting, computer equipment, kitchen appliances, portable heaters and equipment such as cable extension leads. Where equipment is powered from the mains electrical supply there may be a significant electrical hazard that will need to be specifically controlled. OTG will ensure equipment connected to power sources either use “double insulated” or earthed cables and ensure cables are protected against damage. Ensure that equipment is regularly maintained by following the manufacturer’s instructions. Ensure users visually check equipment before and during use. Regularly undertake, by trained appointed persons, formal visual inspections of the equipment including inspection of the plug and its assembly. Carry out combined inspection and testing by electrically competent persons at frequencies required by the risk assessment. A register of such inspections will be kept. Remove from use or arrange for the repair of any appliance that fails any inspection, test or other checks.

### Risk assessment

The appropriate site Director will oversee the risk assessment process. However, each site department will have to undertake its own risk assessments, as the process is simply the application of appropriate and sensible work practices to each individual environment. The Group Health and Safety Manager will be available to advise on and assist with risk assessments. As a result of these assessments, appropriate action will be taken to ensure compliance with the law. Records of the assessments are to be held by department managers. The risk assessments will be carried out on a task basis using the Group Risk Assessment Form.

OTG sites main risks are:-

- Associated hazards
- Physical, chemical and/or biological agents.
- Working conditions and processes.
- Manual handling activities.
- Work-related stress.
- Long working hours.
- Workstations and posture.
- Other workplace hazards.

OTG will ensure that employees undertaking risk assessments are competent to do so, having undergone suitable training in the risk assessment process. Employees will be provided with any additional training identified within the risk assessment process as being a necessary control measure. Risk assessments will be reviewed annually, where they may no longer be valid, or where there has been a significant change in work activities or processes. Records of the significant findings of the risk assessments will be kept and used to identify employees who may be especially at risk.

### Safety signs

Safety signs include the use of illuminated signs, hand and acoustic signals (fire alarms), spoken communication and the marking of pipe work containing dangerous substances OTG will provide specific safety signs whenever there is a risk that cannot be avoided or controlled by other means, for instance by engineering controls and safe systems of work. Where a safety sign would not help to reduce that risk, or where the risk is not significant, there is no need to provide a sign. All safety signs are colour coded and each colour has a meaning, for example: -

- White circle with red edging and a diagonal line indicates **PROHIBITED** for example, no smoking.
- Blue signs indicate that it is **MANDATORY** to carry out an action such as the wearing of personal protective equipment.



- A triangular sign with black edging and a yellow background indicates **WARNING** of a hazard and would normally contain a black pictogram.
- Green signs identify or locate safety equipment as well as marking emergency escape routes.

The company acknowledge that signs must comply with the regulations, however where necessary we may design specific signs to maintain a safe environment. It is our policy to ensure that any signs that are provided for safety reasons are maintained in a good condition, positioned in the correct location and explained to all members of staff to ensure that they are aware of the meaning of the signs and the correct actions to be taken.

## Smoking

Second-hand or passive smoking has now been shown to cause lung cancer and heart disease in non-smokers. In addition, tobacco smoke is a cause of discomfort and irritation to many people, particularly those suffering from respiratory illnesses such as asthma. Due to the lack of epidemiological studies on the harm e-cigarettes pose and in line with the World Health Organisation's recommendations, e-cigarettes will be treated in the same way as traditional cigarettes. OTG will comply with statutory duties in respect of smoking in the workplace and in particular, fulfil obligations to assess the risk associated with smoking in the workplace. Effective measures to prevent or control any ill health effects or accidents arising from such activity will be applied. OTG will take all reasonable steps to ensure that employees and visitors are aware that all premises and company vehicles are legally required to be smoke free. To do this we will display 'no-smoking' signs at entrances to the premises and in vehicles and ensure that nobody smokes in our smoke free premises or vehicles.

## Stacking and storage

OTG utilize a number of different racking and storage types, there have been many accidents associated with the stacking and storage of goods including falls involving people, goods or materials or even the complete collapse of the shelving or racking structure. The term racking is used to describe a skeleton framework of fixed or adjustable design to support loads without the use of shelves. To help manage the safe installation and use of racking and storage systems, OTG will ensure that risk assessments are undertaken in respect of the use of storage systems to ensure that they are correctly designed, installed, maintained and organised in aisles to allow for safe access to goods and materials. The findings of the risk assessments are communicated to employees and others who may be affected by work activities. Racking/storage systems are protected against mechanical damage. Where necessary (i.e. where forklift trucks or other mechanical handling equipment is used), racking will be securely fixed to the floor. Employees are trained in safe methods of storage and retrieval. Regular inspections of racking/storage systems will be undertaken and recorded. Racking/storage systems will be affixed with a notice stating the maximum working load, together with any specified load configurations.

## Stress

It is OTG policy to address all work-related illnesses and in particular stress, to control, reduce or eliminate so far as is reasonably practicable. The Health and Safety Executive has defined health and safety as both the physical and mental wellbeing of all persons employed by the company. We recognise that our personnel are the organisation's most valuable assets and that any problem associated with work-related stress is a management duty. A certain amount of stress provides high motivation, a positive outlook and good performance. However, it is when these personal levels are exceeded that detrimental health effects may appear. Whilst stress-related problems of short duration often resolve themselves, it is the long-term stresses that the company aim to address. The main problem with stress is the self-realisation that we are actively suffering from it! Others affected by our stress symptoms tend to shy away from broaching the subject as it may be construed as interference or just being nosy. Stress is usually brought about by an accumulation of minor irritations that cannot be resolved in the time scale we wish and/or with the desired outcome. However, there may be one single event or set of circumstances that combine to provide the additional stress overload.

Stress counselling can often have a stigma that it is only for the 'weak' or 'mentally ill', however the reverse is actually true. It may be difficult to talk to a colleague about the problem face to face, as it might be this relationship that is the cause. It is our policy that all employees can approach management to raise concerns relating to stress. All conversations will be addressed in the strictest confidence and we will try and assist any individuals suffering from stress.

## Thermal Stress

In order to minimise the potential dangers associated with both heat and/or cold stress OTG will ensure the operating temperature meets and exceeds the minimum temperature guidance as set out by the HSE for both offices and warehouses. Where this is not possible such as working on third party sites or delivering goods to customers we will provide employees with thermal PPE and warm refuges. Hot drinks will be made available and rest areas will meet and exceed the minimum temperature. As there is no upper limit in the HSE guidance OTG will take a risk based approach to heat stress. Site directors will use their discretion to permit job rotation, increased breaks and changes to the usual work wear uniform to include shorts. Employees who are expected to spend extended periods of time in direct sunlight will be issued with sun screen and educated on the associated risks.

## Traffic management

In order to minimise the potential dangers from moving vehicles and mobile plant, a suitable traffic management plan needs to be developed and implemented for each site. Vehicles and mobile plant that need to be controlled include cars, vans, lorries, dumper trucks, fork lift trucks, cranes, tele-handlers, scissor lifts etc. From site to site, logistical and environmental conditions can vary, all drivers receive induction training and copies of any local rules that may be in place. OTG also undertake risk assessments of the hazards created by moving vehicles and plant and develop procedures to protect all persons, equipment and structures on site. Ensure that drivers and operators are trained, competent and hold appropriate licences. Provide information, instruction and training to all persons relating to the requirements of the traffic plan. Only allow access to vehicles and plant that are suitable for the working environment and ensure vehicles have optimal driver vision. Provide safe systems of work for loading and unloading operations. Ensure that vehicles and plant are regularly checked, inspected and maintained by trained and competent persons, according to manufacturer's instructions. Keep records of inspections of plant and equipment. Provide personal protective equipment including high-visibility clothing.

## Visit by an enforcement officer

The Health and Safety at Work etc. Act 1974 and associated legislation conveys powers on inspectors who are appointed by the relevant enforcing authority, in order that they ensure statutory requirements are being complied with. Most dealings with those on whom the law places duties are informal - inspectors offer information, advice and support, both face to face and in writing. They may also use formal enforcement mechanisms, as set out in health and safety law, including improvement notices where a contravention needs to be remedied and prohibition notices where there is a risk of serious personal injury, or ultimately prosecution. Non-compliance can lead to prosecution but this is always seen as the last step in the process, except for: -

- Failure to comply with an Improvement or Prohibition Notice.
- Breach of the law that has significant potential for harm, regardless of whether it caused an injury.
- Reckless disregard for the health and safety of workers or others.
- Repeated breaches of legal requirements where it appears that management is neither willing nor structured to deal adequately with.
- Substantial legal contravention, where there has been a serious accident or a case of ill health.

OTG recognises the importance of co-operation with enforcement officers. For this reason, it is imperative that all relevant documentation associated with our business and work activity is maintained and kept up-to-date. Such documentation includes: -

- This health and safety policy.

- All relevant risk assessments.
- Induction and training records.
- Maintenance, test and inspection records.
- Health records.
- Emergency plans etc.

## Welfare

Welfare provisions will be provided for those people who are not employees but may use the premises on an infrequent basis e.g. visitors and contractors. For disabled persons we will make parts of the workplace accessible for their use e.g. toilets, washbasins, doors, passageways etc. We have responsibility to assess and provide, adequate welfare facilities for employees and other persons using the premises and take account of the general working environment. The welfare facilities provided and maintained by OTG are for the benefit of all employees and visitors. Employees have a responsibility to use the facilities in a proper manner and not damage or misuse any equipment that is provided.

## Work equipment

The definition of work equipment is wide and includes machinery, apparatus, equipment, installations and tools. Therefore items as diverse as photocopiers, shrink wrappers, balers and knives are included. OTG appreciate that some items of work equipment can pose a significant risk if not used in line with the manufacturer's instructions, maintained properly or stored in a correct manner. To control exposure to the hazards presented by work equipment we will ensure that employees are provided with sufficient information, training and supervision when using the equipment. All training will be documented on the employee's personnel file. Ensure that all necessary safety controls are in place such as guards and isolation switches etc. Ensure that all work equipment is maintained and inspected as required by the manufacturer's instructions. Records will be kept of all inspections. Ensure that work equipment is selected which is suitable, by design, construction or adaptation, for its intended purpose in its particular place of use and is suitable for the process and conditions of use. Ensure that work equipment is subject to proper maintenance carried out by persons competent for the work.

The complexity and frequency of maintenance will vary with the type of equipment and its conditions of use. Planned preventative maintenance may be necessary. Wherever possible maintenance will be in accordance with manufacturers' instructions. Where a risk assessment has identified a potential significant risk of injury from the installation or use of work equipment we will arrange for a suitable inspection (which may include test) to be carried out by a competent person.

## Workplace transport

OTG will ensure effective management of workplace transport is adhered to as the potential risk is great, especially where pedestrians and vehicles mix. Accidents can occur when vehicles collide with other structures but the main concern is avoiding contact between pedestrians and vehicles. OTG will ensure all persons who operate vehicles in the workplace are medically fit and trained in the safe operation of the vehicles they will be using. The vehicles will be maintained in a safe condition with regular checks being carried out by the operator and a competent service engineer. In addition, where required a statutory requirement for the vehicle to be examined by a competent person to certify that it is free from defects.

The main hazards associated with external vehicle movements include: -

- Reversing vehicles.
- Poor site layout.
- Loading and unloading.
- Falls from vehicles.
- Parking.
- Riding.
- Height restrictions.
- Use of agency workers.

Vehicle reversing is a dangerous operation due primarily to restricted vision. Such operations should be eliminated where reasonably practicable by the good design and layout of the movement area. Where vehicles have to reverse, as in the case of loading bays, suitable risk assessments will be undertaken to limit the possibility of accidents occurring. Control measures include: -

- Providing trained banksmen using signalling procedures as referred to in the Health and Safety (Safety Signs and Signals) Regulations.
- Ensuring that *all* drivers are aware of the signalling procedure.
- Keeping banksmen well away from the vehicle.
- Checking the area behind the reversing vehicle.
- Providing reversing guides and mirrors.

The purpose is to remove/reduce the risk of pedestrian/vehicle collision so the use of banksmen should not be considered as a primary method of control, without first considering other options. Poor site layout is often a contributory factor in accidents involving traffic movement. OTG will refer to the following control measures to help reduce the likelihood of accidents occurring: -

- Vehicular traffic and pedestrians will be separated where possible either by design, physical barriers or clearly defined routes.
- One-way systems to reduce the amount of cross-traffic.
- Parking areas situated well away from moving traffic and pedestrian flows.
- Vehicle and pedestrian routes well-constructed and maintained.
- Adequate levels of lighting provided and maintained.
- Vulnerable installations are protected e.g. gas and electricity isolation points.
- Speed restrictions in place together with warning signs.
- Direction and instruction signs are clear and well sited.
- Good visibility for drivers and pedestrians.

The loading and unloading of vehicles can prove hazardous especially where mechanical handling equipment is used. Suitable control measures include: -

- Ensuring the vehicle is loaded within its limits with the driver supervising the load placement and distribution.
- The floor is checked to ensure that it is sound and capable of supporting the weight of a forklift truck or goods.
- Loads are always secure.
- If the trailer unit has curtains then only one side of the curtain should be open to prevent the fall of goods off the opposite side.
- Checks are made that goods are secure before releasing any sheets or ropes.
- Loading etc. is not carried out on a gradient.
- If artic-trailers are being loaded etc. care should be taken to ensure that the handbrake is applied, the trailer is stable and there is no risk of overturning.
- The premature departure of vehicles from loading bays can cause serious accidents if the vehicle is still being loaded. To reduce the likelihood of this occurring following action is to be considered by removing the keys from the driver and keeping them in a secure place until a supervisor has checked the unloading or loading has finished.

Drivers should be informed of the procedures in place and instructed to ensure that both the vehicle and trailer brakes are applied.

Working from vehicles should be treated as though people are working at height and appropriate precautions should be taken. Control measures are to include: -

- Devising safe systems of work to avoid the need to climb onto vehicles.
- Providing suitable footwear.
- Training and instructing employees.
- Providing suitable access arrangements to the vehicle.
- Providing overhead gantries for sheeting of loads.

Where possible parking will be positioned in order to avoid the need for pedestrians to negotiate busy traffic routes, crossings will be marked where required. Parking areas will be well-lit and maintained. Procedures will be set in place to ensure that goods vehicles are correctly parked, particularly HGV's. Drivers should follow set parking and disconnecting procedures including ensuring that the trailer brakes are fully applied.

Riding on vehicles is prohibited except where there are purpose-built seats and there are no risks to the passenger. Damage to buildings, equipment and vehicles can easily be caused if the wrong size vehicles use the site. Drivers (particularly agency drivers) should be informed of any restrictions on vehicle movements including the location of any overhead power lines. Warning signs may have to be put up especially on large sites.

Agency drivers will often be unfamiliar with both the site and any safe systems of work that are in operation and will not only be at greater risk themselves but may also create a greater risk to others on site.

The main problems associated with internal traffic movement include: -

- The working environment.
- The frequent transportation of heavy loads.
- Stacking and de-stacking of goods.
- Unloading of vehicles.
- Striking people and equipment.

The control of pedestrian movements within the workplace should be carefully considered, allowing for both the possibilities of pedestrians and vehicles coming into contact and the suitability of the routes that pedestrians use. Where traffic routes are shared between vehicles and pedestrians and it is not possible to provide fixed barriers, floor markings may be required to ensure adequate separation distances. Any markings must be a continuous yellow/black or red/white stripe. Floors should be free from any defects or obstructions that could cause persons to slip or fall or to drop the loads they are carrying. Due to the large number of accidents that occur each year due to slips, trips and falls, the careful management of this problem is essential, the management of this is outlined in the housekeeping section.

## Legionella

Legionnaire's disease is one of a group of diseases collectively known as Legionellosis. People inhaling aerosols, which are contaminated with Legionella bacteria, contract infection. The only areas which pose a hazard to OTG are fire sprinkler systems and hot water systems containing dead-legs. The disease can affect anyone but the old and weak are more susceptible and this group can suffer far more significantly. OTG will ensure that, where a reasonably foreseeable risk of exposure exists a suitable and sufficient risk assessment will be undertaken. An external specialist will be contracted to assist the appointed responsible person with the risk assessment. Where a foreseeable risk of exposure has been found, the first measure is to completely avoid the use of water systems, parts of it or systems of work giving rise to it. If this is not practicable, a written scheme for controlling this risk will be devised, implemented and effectively managed. Consideration will be given to improve engineering design of water systems with a view to eliminating dead legs and other areas where water can stagnate. All water-holding tanks are adequately covered and fitted with air vents and inspection covers, and are properly lagged to prevent temperature rises. Where possible water temperatures between 20°C and 50°C are avoided. Regular cleaning, maintenance and operation of water systems with disinfection of water systems at predetermined intervals is undertaken as per the legionella assessment, the written scheme for exposure control is kept up to date.

### Legionella outbreak

In the case of an outbreak (An outbreak is defined as two or more confirmed cases occurring in the same locality within a six-month period) Local Authorities will be contacted, they in turn will inform the Consultant in Communicable Disease Control (CCDC) to take control. OTG will Co-operate with management arrangements for the control of Legionella in the workplace. Follow any information, training and instruction given by the CCDC to prevent ill health.