



J.R. HOLLAND
FOOD SERVICES

HEALTH & SAFETY POLICY

Health and safety is of vital importance in our organisation. Even though our business is not high risk, poor safety standards directly affect the quality of life for those who work for the company and in the most extreme cases can affect life itself.

GENERAL POLICY STATEMENT

Our policy is to ensure that we meet our statutory duties at all times. We will take steps to ensure that accidents are prevented, that the workplace is a safe and healthy environment for all staff and all others who may be working there and we will endeavour to fully comply with Health and Safety Legislation and Codes of Practice.

Our objectives are: that each employee will be given sufficient information and training to ensure they are able to operate safely; that we will aim to achieve a 5% reduction in lost time accidents and incidents during the next period; that in our external audits carried out during the next period we will achieve at least an 85% safety rating.

RESPONSIBILITY AND ACCOUNTABILITY

Responsibility and accountability for all matters including health, safety, welfare and implementation of this policy, rests with me the Managing Director. I am responsible for ensuring that the policy is implemented in full within the business.

Managers and those with nominated responsibilities are required to ensure that the health and safety procedures are fully complied with and that continuous effort is applied to improve the quality and safety of the working environment.

Every employee has a personal responsibility to contribute to the safety of his or her workplace and to consider the safety of others who may be affected by their failure to do so.

ADMINISTRATION

On site is a company Health & Safety Manual. This contains the company's procedures and recommendations as to the responsibilities, duties and standards required in carrying out key tasks safely. This manual is available to be seen and read and should be used as a reference by anyone carrying out specific tasks and duties.

To ensure that we are effectively and successfully implementing our health and safety policy and that our standards and objectives improve in line with the developments in legislation and best practice, an independent audit of our performance will be carried out at each business unit on a pre-planned cycle. Management will carry out an annual review of performance against our objectives, which will be reported to employees.

A good safety record is in the best interest of the business and all of us as employees – it is therefore up to us, through our actions, to help the business and ourselves.

Mr. D C Hutchinson
Managing Director



General Health and Safety Arrangements Responsibilities and Authority

Introduction

As stated in the Safety Policy, the ultimate responsibility for safety and health is vested in me, the Managing Director, I have the overall responsibility for the implementation of the Company Health and Safety Policy.

Each Manager (referred to in this Safety Policy as Heads of Department) will be responsible for the maintenance of safe and healthy working conditions in their area, process or function over which they exercises control. They will further be responsible for ensuring that the necessary actions are taken to maintain any plant and equipment in a safe and healthy condition. They are also required to report any circumstance where this cannot be achieved to the Managing Director without delay.

Each supervisor (referred to in this Safety Policy as Supervision) will assist their Manager by fulfilling the responsibilities allocated in the policy.

Every person employed (referred to in this Safety Policy as Employee) has legal responsibilities, which are covered in their health and safety training. All requests, suggestions or complaints concerning matters of health and safety must, in the first instance, be referred to the employee's immediate Manager who will decide the appropriate course of action.

The Organisation and Reporting Structure for the management of health and safety is the same as for all other aspects of business, as shown on the organisation charts posted in the workplace. In order to ensure the effective management of health and safety at work, the following specific responsibilities and authorities are allocated.

Managing Director

- Overall responsibility for the implementation of the Health and Safety Policy and monitoring its effectiveness.
- Liaison with other Directors and Enforcing Authorities, as necessary, to ensure that adequate resources are allocated to Health and Safety at Work.
- Ultimate authority for approval of policy, organisation and arrangements.

Managers

- To bring the Health and Safety Policy to the notice of employees within their areas for which they have specific responsibility and to ensure that the policy is kept up to date.
- To monitor safety performance, review the safety organisation, to allocate safety responsibilities and to appoint persons under Regulation 6 of the Management of Health and Safety at Work regulations.
- To liaise with Enforcing Authorities, Environmental Health Officers, Fire Prevention Officers and the company's Health and Safety Consultant.
- To keep up to date with legislation as advised by the Company Safety Consultant and to ensure any new plant, machinery and processes are in accordance with legal requirements.
- Authority to interpret this policy in accordance with the general policy statement where specific issues are not covered.



Quality Systems Manager

- To collect all relevant Safety Data Sheets, up-date the master set of Safety Data Sheets and bring any changed information to the notice of the appropriate people.
- To evaluate and validate the Risk Assessments and ensure that they are adequate.
- To ensure that appropriate training is provided and keep a list of the training provided in relation to Abrasive Wheels, First Aid, Forklift Truck drivers, Fire Marshals etc.
- To keep essential health and safety reference documents, registers etc. and ensure the display of appropriate safety signs and posters (including fire notices).
- To select appropriate Personal Protective Equipment, First Aid and other safety equipment.
- To monitor and audit all necessary records, including records of accidents, maintenance and testing of the Fire Alarm and other statutory record keeping requirements.
- To act as an appointed Competent Person under Regulation 6 of the Management of health and Safety at Work Regulations by providing relevant assistance to Managers.
- To act as Secretary of the Safety Committee.
- Authority to interpret this policy in accordance with general policy statement where specific issues are not covered.

Employees

- To take reasonable care for their own health and safety and for the health and safety of others who may be affected by their acts or omissions.
- To make proper use of all machinery, safety devices and other equipment (including Personal Protective Equipment) provided for their health and safety.
- Not to interfere with or misuse anything provided in the interests of health, safety and welfare.
- To co-operate with the Company to enable the requirements of the law to be observed.
- To report all accidents, no matter how minor, to their Manager.
- To report any dangerous conditions, inadequately controlled risks and any incidents to their Manager so that remedial action can be taken.
- To work in accordance with the safety rules and procedures established for the Company and described in the Company Safety Manual.



Administration of Health and Safety at Work

Introduction

This section of the Health and Safety Policy sets out the systems and procedures which have been established to ensure satisfactory administration of Health and Safety at Work in the Company. In establishing these procedures, due regard has been paid to the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999.

General health and safety procedures are contained in this part of the Health and Safety Policy. Detailed health and safety procedures for risk control, including engineering standards and working practices, are included in the separate Health and Safety Manual kept on site.

Health and Safety Legislation

The Quality Systems Manager and Company Safety Consultant are responsible for ensuring that the Company is kept up to date with changes in Health and Safety at Work legislation. Details of changes will be discussed with Managers.

When appropriate, the Company will obtain copies of new Health and Safety at Work publications. These publications will be added to the basic library of health and safety publications held by the Quality Systems Manager.

The reference documents held by the Quality Systems Manager are available to all Managers for inspection. Individual employees may also have access to these reference documents, on request to their Manager and/or the Quality Systems Manager.

Arrangements for Undertaking Risk Assessments

The responsibility for ensuring that suitable and sufficient Risk Assessments have been undertaken has been allocated to the Quality Systems Manager for Work Activity Risk Assessments and to Managers for Workplace Risk Assessments.

The Work Activity Risk Assessments will be undertaken within each department by a small group, typically made up as follows:

- Manager
- Department Staff

The draft Work Activity Risk Assessments will then be handed to the Quality Systems Manager to be checked and validated. The Quality Systems Manager is then responsible for co-ordinating the implementation of the Risk Assessment with Managers.

The Quality Systems Manager will then ensure that the validated Work Activity Risk Assessments are explained to employees by way of appropriate safety training/briefings. The Quality Systems Manager will also ensure that adequate Record Keeping systems are put in place.



In relation to the Workplace Risk Assessments, Managers will co-ordinate the Risk Assessment exercise by means of a small group comprising:

- Employees in the areas
- Quality Systems Manager

The Managers and the Quality Systems Manager will jointly ensure that the Workplace Risk Assessments are implemented and adequate record keeping systems are put in place.

Safety Training

Adequate instruction will be given to all employees on the safety systems and procedures relevant to their own work activities. Management is responsible for ensuring that due regard is paid to the health and safety capabilities of employees when allocating work tasks.

The Company has produced a Health & Safety Manual. A copy of the Manual is available on site and each employee is informed of the contents. Each employee will be required to sign stating that they have been instructed in the contents of the Safety Policy, safety procedures and the Manual as well as in their obligations under Health and Safety at Work legislation.

Safety Notices and Communications

A copy of the General Statement of Policy on Health and Safety at Work is displayed on appropriate notice boards. Also, the minutes of the latest Safety Committee Meeting are posted for the information of employees.

The Quality Systems Manager is responsible for ensuring that all statutory and other safety notices are displayed, including the Electric Shock Placard. Also, the Quality Systems Manager will co-ordinate safety campaigns, including the display of safety posters, when necessary.

Employees will be encouraged to report safety concerns to their Managers. Reporting of safety concerns is a legal responsibility placed on employees and the Company will ensure that all such reports receive due consideration.

Safety Committee and Safety Representatives

The Company recognises the important part played by Safety Representatives in ensuring that adequate standards of Health and Safety at Work are achieved and maintained. Appropriate facilities will be made available to Safety Representatives and adequate time will be allowed so that they can fulfil their functions successfully.

Routine meetings of the Safety Committee will be held and the membership of the Safety Committee will be as follows:

- Managing Director (Chairman)
- Quality Systems Manager (Secretary)
- Managers (On Rotation)
- Two Safety Representatives (On Rotation)

The Safety Committee will meet on dates set by the Committee Chairman. Minutes of the meetings will be circulated to members of the Safety Committee with additional copies displayed on appropriate notice boards.



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Disciplinary Procedures

As part of ensuring that employees adhere to the safety rules and procedures established by the Company, the established Disciplinary Procedure will apply to Health and Safety at Work matters.

Any employee, irrespective of seniority, failing to follow established safety standards and procedures will be liable to disciplinary action. This will include formal verbal warning, written warning, and other appropriate disciplinary measures. Records will be kept of all disciplinary warnings and the Quality Systems Manager is responsible for ensuring the correct and consistent application of disciplinary procedures to safety matters.

Records and Registers

The Manager for any area is responsible for keeping necessary records for matters under his/her control. Each Head of Department should ensure that all the records for which he/she is responsible are kept up to date and all safety posters and safety notices are not defaced and are kept clearly visible.

The Quality Systems Manager has responsibility for the safety records that relate to the site as a whole. The Quality Systems Manager is responsible for fulfilling his own record keeping obligations and is also responsible for auditing other records on a routine basis. Failure to maintain adequate records is a serious matter that will be subject to disciplinary action in appropriate cases.

Records will be kept up to date and distributed to appropriate personnel for completion and/or for information, as applicable. In particular, the Quality Systems Manager will retain relevant records, including the following, as detailed in the separate Health and Safety

Register:

- *Appointment to change Abrasive Wheels*
- *Appointment to drive Forklift Trucks*
- *Examination and test of portable electrical equipment*
- *Examination and test of pressure systems*
- *Examination and test of hoists and lifting machines*
- *Examination and test of chains and lifting tackle*
- *Fire and emergency drills*
- *First Aid training*
- *Food hygiene training*
- *Inspection of fire extinguishers*
- *Inspection of Forklift Trucks*
- *Inspection of electrical installation*
- *Issue of Personal Protective Equipment*
- *Noise measurements*
- *Record of fire training*
- *Testing Fire Alarm*
- *Training in use of Personal Protective Equipment*
- *Waste disposal records*

Fire Safety Standards

The Quality Systems Manager has overall responsibility for fire safety at work, including organising fire drills, organising testing of the Fire Alarm, checking fire extinguishers and ensuring full compliance with the Fire Regulations.

Employees are appointed as Fire/Emergency Marshals. They will be aware of fire risks and report matters of concern to the appropriate Manager.

In the event of a fire or Fire Drill, Managers will ensure that established fire procedures are followed. This will include ensuring that the building has been evacuated in the event of fire or a Fire Drill. Any difficulties encountered during a fire evacuation or drill should be reported to the Quality Systems Manager, as soon as possible after the event.

Only the appointed Fire/Emergency Marshals are trained and authorised to use fire fighting equipment, including hoses and fire extinguishers. Due regard should always be paid to training in use and personal safety when tackling a fire.

First Aid at Work

Nominated persons will be trained as qualified First Aiders. Volunteers from amongst the workforce are always encouraged.

First Aiders should ensure that all accidents and First Aid treatments are recorded in accordance with company procedures.

A list of current First Aid personnel is posted on notice boards and a copy is kept by the Quality Systems Manager. The Quality Systems Manager will also ensure that refresher training of First Aid personnel takes place, as appropriate.

Accident and First Aid Procedures

It will be the responsibility of the First Aider providing first aid treatment to ensure that details of the treatment are recorded. Employees are obliged to report every injury (no matter how minor) to their Manager or to a First Aider for treatment.

Details of First Aid treatments will be recorded and will be analysed on at least a monthly basis. The Quality Systems Manager is responsible for ensuring adequate investigation of all accidents, after discussion with the Department Manager when appropriate.

In the event of a serious injury that results in lost time, the Managing Director will be advised as soon as possible. If the accident results in a Major Injury, then immediate telephone notification to the HSE will take place. This immediate telephone notification will be made by the Quality Systems Manager, after liaison with the Managing Director.

Written notification of accidents which cause more than 3 days absence from work will be prepared by the Quality Systems Manager on the appropriate record form. The form will be checked and approved by the Managing Director before despatch to the HSE.

Accident investigation will be undertaken in the case of every accident that is reportable to the Health and Safety Executive. The Quality Systems Manager may, at his discretion, initiate a more detailed investigation of certain accidents. He will invite appropriate persons to assist in the investigation, so that the circumstances of the accident can be established and necessary actions taken to prevent a recurrence.



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Certain Dangerous Occurrences are reportable to the HSE, even if no injury has occurred. Health and Safety Executive leaflet HSE17 contains details of reporting procedures. A copy is held by the Quality Systems Manager.

Generally speaking, reportable dangerous occurrences are serious events that would, in any case, be reported to the Managing Director for appropriate action. If a Department Manager believes that a reportable incident may have occurred, then the Managing Director should be advised, before work resumes – if possible.

Employee Medical Arrangements

The Company has a policy of ensuring that all new employees complete a pre-employment medical questionnaire. Where practicable, a pre-employment medical examination/assessment will also be undertaken. The examinations and the completion of the questionnaire will be undertaken under the rules of medical confidentiality and only non-clinical information will be kept on personnel files.

The Quality Systems Manager will handle all medically confidential information and liaise with the employee's own General Practitioner, if necessary.

In particular, routine hearing tests will be undertaken on employees who work in noisy areas. Also, routine enquiries to detect the early signs of any Repetitive Strain Injury will be undertaken for employees who may be at risk of developing such medical conditions.

Visitors and Contractors on Site

Visitors on site are the responsibility of their host. Visitors to the offices will be accompanied at all times and they remain the responsibility of their host during fire evacuation or other unusual or unplanned circumstances.

Visitors who also require access to production areas must make use of suitable PPE as necessary/advised. The host should ensure that visitors are not placed at risk during visits. In particular, visitors should be kept out of risk areas as far as possible.

Contractors who are employed to undertake work cannot realistically be accompanied at all times, but will be advised of safety issues. The satisfactory conduct of contractors on site is the responsibility of the relevant Manager - they should ensure that contractors are aware of the hazardous areas in the Company and also ensure that contractors have appropriate Personal Protective Equipment. Contractors are required to advise the Quality Systems Manager of any accidents and injuries to their employees on Company premises.

Contractors arriving on site should report to the Manager concerned. Contractors will then be briefed and should state what plant and equipment is to be used by them. Contractors found to be disobeying Company safety rules, failing to make use of necessary Personal Protective Equipment, using defective or dangerous equipment or working with disregard to their own safety or that of others may be dismissed from site.



Enforcing Authority Visits

Various enforcing officers will visit the Company from time to time. HSE Inspectors, Environmental Health Officers and Fire Officers all have statutory authority to visit the Company to enforce legislation under their control.

The fullest co-operation with all visiting enforcement officers will be ensured and the Company will always be responsive to recommendations and advice received. The Quality Systems Manager will liaise with visiting enforcement officers and ensure that they are accompanied during their visits. In his absence, the Senior Site Manager will be responsible for appropriate liaison.

If none of the above officers of the Company are available, then the appropriate Department Manager should meet the visiting enforcement officer. They will co-operate fully with the visiting inspector.

Monitoring and Auditing of Health and Safety at Work

Safety standards for all work activities undertaken at the Company have been established. Appropriate Risk Assessments have been undertaken, as required by the Management of Health and Safety at Work Regulations and other legislation.

In order to ensure that satisfactory standards of Health and Safety at Work continue to be achieved within the Company, routine safety checks and inspections will be undertaken. Each Manager will be required to undertake a weekly safety checklist inspection and ensure that all items referred to in the checklist are satisfactory.

Special Health and Safety Issues

Lone Working

Under the Health & Safety at Work Act 1974 & the Management of Health, safety at Work Regulations 1999, the Company has duties to ensure Lone workers are not exposed to specific hazards.

All lone workers are required to advise the Monitoring Service when they start work on their own. The Monitoring Service will contact the lone worker on his mobile telephone every hour. All calls to the lone worker must be logged to ensure that there is a record of all communication between Monitoring Service and the lone worker.

To ensure compliance with the Health & Safety at Work Act 1974 and the Management of Health & Safety at Work regulations 1999, following these procedures helps eliminate and reduce the risks that Lone Workers might be exposed to.

Driving Activities

The Health and Safety at Work etc Act 1974 requires the Company to ensure, so far as is reasonably practicable, the health and safety of all employees while at work, this includes those off site everyday on driving duties. The Company also has a responsibility to ensure that others are not put at risk by its work-related driving activities.

The Company will carry out an assessment of the risks to the health and safety of our employees, while its staff are driving, and to other people who may be affected by the driving activities. The Regulations require the Company to periodically review its risk assessment so that they remain appropriate; this is done on an annual basis.

To ensure the Company is satisfied that its drivers are competent and capable of doing their work in a way that is safe for them and other people, it checks the drivers relevant previous experience, the validity of their driving licence and the validity of their LGV driving entitlements. The Company at-work drivers are made aware of company policies on work-related road safety, to ensure they understand what is expected of them.

Manual Handling Activities

The Management of Health and Safety at Work Regulations 1992 (MHSW Regulations), as amended require the Company to assess any risk arising from a work activity, taking remedial action as appropriate, and to have suitable arrangements for safeguarding the health and safety of employees and others.

Whilst the Company cannot avoid all manual activities where it can, the Company will look to avoid it as much as possible, in those circumstances, a thorough assessment is undertaken, and measures must be introduced to reduce the risk of injury to the lowest level reasonably practicable.

The Company monitors all handling activities to ensure the effectiveness of those measures, and re-assessment is carried out where necessary, but not less than annually.

Health & Safety Manual

A copy of the policies, responsibilities and procedures is maintained in the Company Health & Safety Manual. A copy of the manual is kept on site and maintained by the Quality Systems Manager. The Manual can be inspected by arrangement with the Quality Systems Manager.

