



Health & Safety Policy

This is the **Norman Lewis Ltd** Health and Safety Policy document. It identifies the arrangements the company has made with regards to the protection of its employees and others who may be affected by their work activities. The document will be reviewed annually or when significant changes occur to the arrangements.

SIS
2011

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Amendment & Annual Review Sheet

Amendment List (AL)

AL no.	Location, page no.	Date	By whom
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Policy annual review

Review date	Latest AL no.	By whom	Comments

Health and Safety Policy

Statement of Intent

Norman Lewis Ltd (Hereafter to be referred to as **Norman Lewis** or the company) acknowledges and accepts its statutory responsibilities for securing the health, safety and welfare of its employees and of contractors working for the company and of other persons, including visitors. This policy covers all staff employed by **Norman Lewis**. This Policy Statement reflects the importance attached to protecting the health, safety and welfare of all who may be affected by the company's business activities.

Norman Lewis will provide and maintain safe and healthy working conditions, in particular ensuring, so far as is reasonably practicable that:

- The requirements of the Health and Safety at Work Act 1974 and other relevant legislation are complied with;
- Responsibilities for health and safety are properly assigned, accepted and fulfilled at all levels;
- Adequate resources are provided to ensure that proper provision can be made for Health, Safety and Welfare matters;
- Risks arising from its work activities are assessed, effective control measures are implemented and regularly reviewed;
- All employees receive information, training and supervision in how to carry out their work with regard to their safety and the safety of others;
- Employees are consulted on health and safety issues and changes to new or existing work practices;
- An appropriate level of information and instruction is provided to its visitors and contractors;
- The provision and maintenance of all plant and equipment is safe and without risk to Health and Safety;
- The working environment is safe and without risks to health and safety and that adequate provision is made with regard to the facilities and arrangements for staff welfare at work;
- Work-related accidents, ill health and safety performance are monitored to maintain the agreed standard.

Health and Safety is a line-management responsibility. Members of staff at all levels must ensure that they have adequate arrangements for discharging their duties with respect to this policy statement and have procedures in place for monitoring the effectiveness of these arrangements.

All employees have a legal responsibility for their own safety and that of other persons who may be affected by their acts or omissions and to co-operate with the implementation of the Health and Safety policy and the integration of safety into all company activities. This includes reporting through the management chain any work situation giving rise to serious or immediate danger to individuals, or any shortcomings in the arrangements that may create danger.

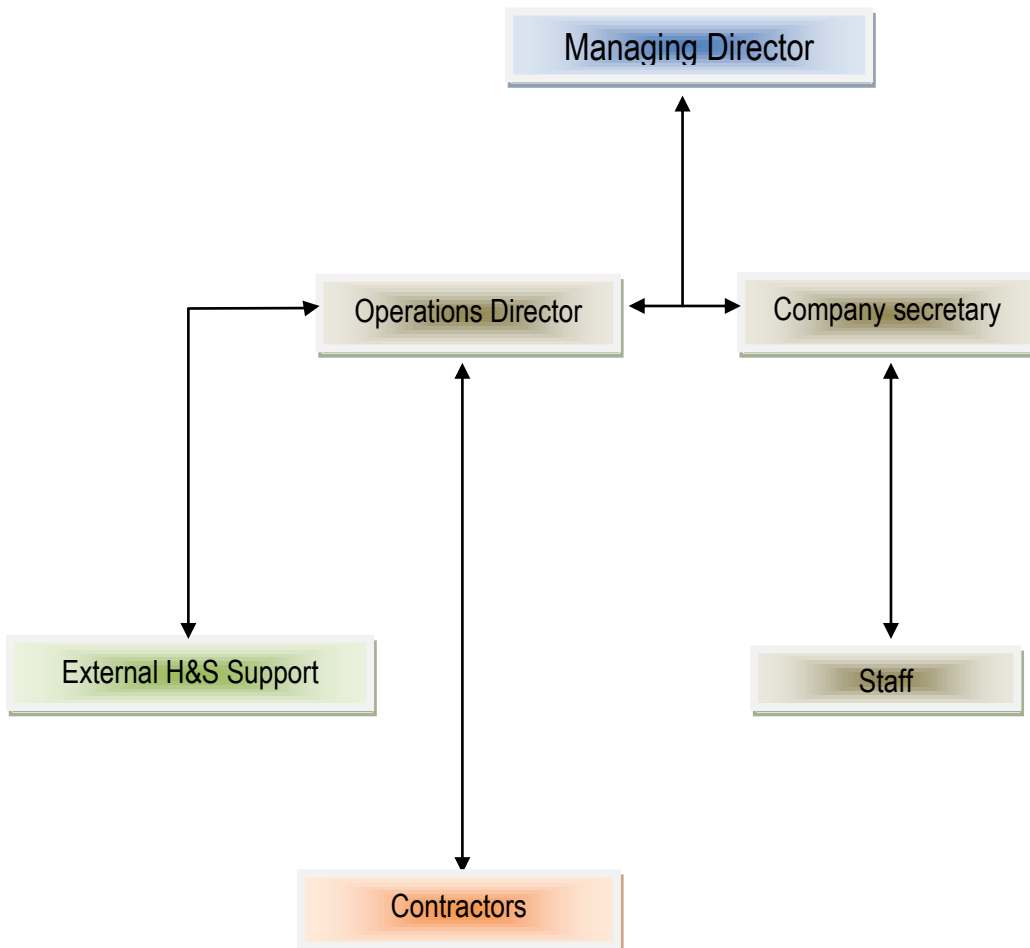
Norman Lewis will review the Health and Safety policy annually, or when there is significant change to the business activities or relevant legislation. Any changes will be made known to all employees.



M J Foley
Managing Director

2 Organisational chart

Health & Safety Management Organisation



3 Roles & Responsibilities

3.1 Managing Director

- a) Has overall responsibility for health and safety matters within the company and will ensure that action is taken to prevent any employees being put at risk whilst they are in the company's employ.
- b) Shall ensure that the necessary funding is available to fulfill the requirements of this policy and any future health and safety requirements in full, in line with his legal and moral duty to do so.
- c) Shall monitor and review the resources necessary to comply with this policy.
- d) Shall ensure that this health and safety policy is enforced through line-management.
- e) Shall ensure that the company and its employees comply with all requirements of *The Health and Safety at Work Act 1974*, this policy and any risk assessments for work to be carried out.
- f) Shall review the health and safety policy annually or when significant changes occur to the business operations.

3.2 Company Secretary

- a) Shall ensure that all members of staff complete the company induction form and is held in their personal file.
- b) Shall ensure that all members of staff are made aware of their role and responsibility with reference to the company health and safety policy, and that compliance with the arrangements within the policy is one of the terms of employment.
- c) Shall ensure that the Board of Directors are made aware of any disciplinary matters concerning a breach of the company safety arrangements.
- d) Assist in monitoring the effectiveness of measures to address stress by collating sickness absence statistics.
- e) Shall ensure all necessary and adequate health and safety training is provided to all persons involved in Company operations.
- f) Shall report accidents in accordance with RIDDOR and this policy. Shall investigate the cause of injury, damage and/or loss and advise the Board of Directors of the findings.
- g) Shall discipline any employee whose acts or omission do or may lead to injury, damage or loss in accordance with relevant employment, equal opportunities and health and safety legislation etc.

3.3 Operations Director

- a) Has the day to day responsibility for ensuring that health and safety matters at all sites are effectively managed by the contractors under **Norman Lewis'** control, and will ensure that action is taken to prevent any persons being put at risk whilst they are in the company's employ.
- b) Through the line management, shall ensure that work carried out by employees and contractors are properly risk assessed and that staff are aware of the control measures available to ensure their health, safety and welfare.

- c) Shall ensure that the following points are covered during the induction process for new staff; the company safety rules, best working practice, training, health, safety and welfare issues, reporting of accidents and near misses.

- d) Shall ensure that Personal Protective Equipment (PPE) is available and used by employees, wherever it is required by law, this safety policy or as identified as necessary in any assessments. Training will be provided for employees on the on the safe use, storage and maintenance of the relevant protective equipment.

- e) Responsible for ensuring an agreed Fire Safety Plan is displayed.

- f) Shall carry out site safety checks on contractors work at random intervals and ensure that findings are recorded and all necessary remedial action taken. Site inspections must be recorded on Form C.

- g) As far as possible, ensuring all employees under their control receive H&S information, instruction and training commensurate with their job role and responsibilities;

- h) Responsible for ensuring contractors are aware of the **Norman Lewis** Health & Safety policy;

- i) Where employees or contractors under their control are observed working in an unsafe manner or are in breach of **Norman Lewis'** Health and Safety policy & procedures or legislation, taking appropriate action to rectify the issue;

- j) Ensuring all employees and contractors report all accidents/incidents to **Norman Lewis** for possible investigation;

- k) Will liaise with the external Health & Safety consultant with matters regarding to the Safety Management System;

3.4 Employees

All employees must read and understand the **Norman Lewis** health and safety policy and related risk assessments relevant to his/her work. In particular the employee must:

- a) Carry out their duties in a safe manner, in accordance with company policy, procedures and safe working practice;

- b) Be alert to hazards whilst carrying out work for the company and to make suggestions for safer work procedures as appropriate;

- c) Comply with the health and safety instructions issued and carry out duties in accordance with any requirements indicated on Risk Assessments, Method Statements or rules for their area of work. If these include the use of Personal Protective Equipment then the employee has a legal duty to comply;

- d) Take reasonable care of their own health and safety and that of others who may be affected by their actions;

- e) Co-operate with management in fulfilling their duties under health and safety legislation;

- f) Ensure accidents, incidents and ill health are reported to their line manager immediately;

- g) Report any defects in equipment to the Operations Director;

- h) Comply to the site rules including the governing of restricted access areas;

- i) Report any matter likely to compromise fire safety in the building, and to co-operate with the Management and Fire Wardens during emergency or drill situations;

- j) Not intentionally or recklessly interfere with or misuse anything provided in the interest of health, safety or welfare;
- k) Ensure manual handling tasks are performed only when there is no alternative and following individual manual handling training;
- l) Use Display Screen Equipment in accordance with specific training.
- m) Know and apply the emergency procedures in respect of fire and first aid.

If an employee has issues or concerns about a health and safety matter this can be raised with their line-manager or any Director.

3.5 External Health & Safety Support

- a) **Simmons** will provide Health and Safety Consultancy Services as per the Consultancy Agreement. When called upon the consultant will carry out the following additional services; hazard analysis, risk assessment, accident investigation, issuing competent advice, workplace audits/inspections, health and safety training, and monitoring the health and safety performance of the company through consultation with the Managing Associate.
- b) **Simmons** will assist in reviewing the policy document and any procedures regularly and issue amendments for the Managing Director to authorise.
- c) All members of staff who have concerns regarding Health and Safety in their place of work will put their concerns to the Operations Director.

3.6 Contractors

- a) Will be expected to comply with the **Norman Lewis** Health and Safety Policy.
- b) Job specific Risk Assessments/Method Statements/COSHH Assessments will be required no later than 72 hours before contractors carry out works, (except emergency work).
- c) All contractors employed will be appraised and approved for the work they carry out.
- d) Contractors are welcome, and encouraged, to discuss safety matters with the Operations Director.

4.0 Arrangements for the implementation of Health & Safety Management System

Norman Lewis has developed the following arrangements to enable it to effectively implement a robust Health and Safety Management System:

4.1 The Work Environment

4.1.1 General work environment

Norman Lewis recognises that under the Health and Safety at work etc. Act 1974 and the Workplace (Health Safety and Welfare) Regulations 1992 the company has an obligation to provide and maintain an environment that is safe to work in without risks to employees, contractors, clients and members of the public.

Norman Lewis will ensure that workplaces and work environments are subject to the risk assessment process.

Areas taken into account will be:

- **Ventilation** – to ensure that all areas within the Company's control are adequately ventilated by either means of natural or mechanical ventilation
- **Heating** – to ensure that all workplace temperatures where appropriate are reasonable (above 16°C for office and above 13°C for warehouse *if exertion is involved.*)
- **Lighting** – to ensure that lighting levels are suitable and sufficient for the work that is carried out
- **Housekeeping**– to ensure that: all furniture, fittings, walls, floors and ceilings are clean; waste material is kept in suitable containers and removed regularly by licensed contractors; workstations are all free from unnecessary paperwork; items are not left in traffic routes etc
- **Storage and stacking** – to confirm that the office and surrounding environment is ergonomically designed to prevent staff over reaching or straining themselves; that items are stacked and loaded correctly; and that appropriate stepladders are available for work that is required to be done above shoulder height
- **Room dimensions and space** – To ensure that all rooms where persons work are adequate in size for the work being carried out and the number of persons in them
- **Workstations & seating** – To ensure that all workstations are suitable for use, free from trip hazards, and have appropriate seating and footrests provided where necessary
- **Floors and passages** – To ensure that all floors are checked to ensure that they are free from obstructions, trip hazards and in good condition; they are treated for ice in winter conditions and an appropriate spillage procedure is adopted; stairways with more than 3 steps have handrails and are checked regularly for stability.
- **Windows, glass doors etc.** – To ensure that windows can be opened safely and pose no risk when they are open; all glazing has been checked to ensure it is to the appropriate safety standard and can be cleaned safely by an approved contractor; that all doors and windows are suitable for their purpose; and that electronic doors and shutters are suitably maintained
- **Welfare facilities** – To ensure that toilet facilities are adequate in number with washing facilities; a wholesome supply of drinking water is provided; and there are facilities available for the storage of outdoor clothing.
- **Falls** – To confirm that where it is possible for persons to fall, particularly more than 2 metres, that appropriate safety precautions, such as the use of fixed barriers, have been taken
- **Safety signage** – To ensure that safety signs are provided to notify persons of specific hazards, such as showing the way to the nearest fire exit, prohibited procedures and warning of danger.
- **Visitors** – The **Norman Lewis** Health & Safety Policy applies to visitors. Visitors are entitled to see a copy of the policy on request.

Norman Lewis recognises that the above list is by no means exhaustive and all areas will be comprehensively considered as part of the workplace risk assessment process. Regular monitoring for hazards

in the workplace will be undertaken, and where issues are found remedial action will be implemented. A record of this will be kept.

4.1.2 Manual handling

Norman Lewis understands and accepts that manual handling is a part of everyday life for most people. Some staff may need to undertake manual handling task on a frequent basis as part of their role. Tasks that may be frequent or repetitive will be risk assessed and suitable controls put in place to manage risks.

In conjunction with this, and where it is reasonably practicable to do so, activities will be mechanised. Appropriate training in manual handling will be provided where applicable, and always where found to be required further to a manual handling assessment. This will cover safe handling techniques, manual handling risk factors and injuries, safe systems of work for handling including the provision and use of PPE, safe use of mechanical aids and practical application as necessary.

4.1.3 Working at height

Norman Lewis recognises that there is an increased risk to the health and safety of its employees when working at height. All work carried out at height will be covered by a risk assessment.

The Working at Height Regulations do not define a minimum height at which a person can work without the need of a risk assessment. The Regulations state that working at height is *'any height from which a person can fall and sustain injury'*.

Further guidance

Use of ladders and stepladders

Ladders will only be used for work of short duration where no alternative is available, for site-work the Operations Director should ensure that contractors identify on their risk assessments suitable equipment i.e. podium steps instead of ladders. Employees using step-ladders shall be adequately trained in their use and safe working practices.

4.1.4 PAT testing

All electrical appliances used are regularly tested by a trained, competent person at intervals defined in the IEE Code of practice for In-service inspection and testing of electrical equipment using a PAT tester to ensure that they are safe to use. The information is recorded on the Appliance Testing Pass Certificate. If the equipment fails the test it is removed from use and either repaired and successfully retested or replaced.

4.1.5 Electrical Work Practice

- a) All electrical maintenance work will be carried out by trained and qualified persons.
- b) All electrical installations shall be clearly marked denoting electrical hazard.
- c) Access routes to all electrical installations should be maintained at all times.
- d) All fuse boxes and electrical isolators should be marked so they can be readily identified.
- e) All electrical work carried out must conform to current IEE Regulations.

4.1.6 Site Inspection

The Operations Director will carry out workplace safety inspections (Contractors work-site) at random intervals. Once completed, the inspection forms are to be kept in the office for auditing purposes and review. Any

observations which may have an impact upon the safe working procedures or environment must be result in working being halted until a safe condition exists. The external Health & Safety can also be called upon to carry these inspections.

4.1.7 Asbestos

Norman Lewis recognises that it has a duty to protect its staff from the hazards associated with asbestos .

Site work

If during the course of work activities suspected asbestos material is found the area will be immediately evacuated and cordoned off until such time as a registered specialist contractor attends the site to confirm if asbestos is present. If asbestos is found it must be suitably dealt with, by a Licensed Contractor, before work can commence.

For all site work asbestos surveys have been undertaken by an independent specialist consultant and an Asbestos Register and Asbestos Management Plan are available from the client or the principal contractor..

Head Office (Croydon)

Any person carrying out work on the building must be made aware of the Asbestos Register and Asbestos Management Plan identifying the location of asbestos, or materials assumed to be Asbestos Containing Materials.

4.1.8 Fire prevention and control procedures

Fire prevention: A fire risk assessment will be carried out and reviewed annually and all necessary fire safety precautions will be adopted as follows:

- a) All employees shall be made familiar with the location of fire control equipment, the types of fire which may be controlled with each extinguisher type and the method of use.
- b) All fire fighting equipment will be regularly inspected and maintained.
- c) The Company Secretary shall be informed when any fire fighting equipment is discharged or used so that it may be tested and reinstated.
- d) A high standard of housekeeping shall be maintained to avoid the accumulation of combustible materials.
- e) All flammable liquids and gases will be carefully controlled and suitably stored AT ALL TIMES.
- f) Smoking is prohibited in all work areas.

Fire training and fire drills

- a) **Norman Lewis** has a documented Fire Evacuation Procedure which is displayed on notice-boards throughout each site and is brought to the attention of all staff. All employees will receive appropriate fire safety training.
- b) Fire Wardens shall be designated and appropriately trained for the role. Details of fire wardens will be displayed on notice boards.
- c) A fire drill will be conducted twice in every 12 month period, the details of which will be recorded in the fire log book.
- d) All documentation relating to fire safety and training is kept by the Company Secretary.

4.1.9 Display Screen equipment

Norman Lewis will ensure that all DSE users are identified and a subsequent DSE assessment carried out, a copy of which will be retained. Any control measures deemed necessary as a result of the assessment will be implemented and a record kept. The findings of the assessment will be reviewed regularly, and when circumstances change, for example, during office refurbishments.

Norman Lewis recognises that DSE users are entitled to request an eyesight test paid for by the company. If the test reveals that the employee requires corrective lenses in order to carry out DSE work, **Norman Lewis** will pay for a pair of glasses up to the statutory amount. The user may wish a more expensive pair on that occasion they must fund the extra amount themselves.

4.2 Health & Safety Provisions

4.2.1 First aid

Norman Lewis will ensure an appropriate number of first aiders are appointed and adequately trained. Details of appointed first aiders will be displayed on the notice board within the building. A first aid kit will be provided and stored in the kitchen area and will be checked and kept stocked on a regular basis. A notice will clearly show where first aid boxes are kept.

4.2.2 New & expectant mothers

Norman Lewis will consider the hazards in the workplace that could pose health and safety risks to new and expectant mothers and take appropriate action to remove or reduce the risk. When **Norman Lewis** receives written notification from an employee that she is pregnant, has given birth within the previous six months or is breastfeeding, then a competent person will conduct a specific risk assessment identifying the hazards and consider the risks.

This will involve a review of any other assessments that had been previously carried out, including General Work Risk Assessments, Manual Handling Assessments and Display Screen Equipment Assessments. The assessment will take into account any advice provided by the woman's GP or Midwife on her health and must be written.

If any risks are identified then **Norman Lewis** will take action to remove, reduce or control the risk. If the risk cannot be removed by the company, it will:

Action 1

Temporarily adjust her working conditions and/or hours of work; or if that is not possible

Action 2

Offer her suitable alternative work (at the same rate of pay) if available; or if that is not feasible

Action 3

Suspend her from work on paid leave for as long as necessary to protect her health and safety and that of her child. **Norman Lewis** will consult with the expectant mother during pregnancy to establish if she is experiencing further difficulties or if there are any new risks to her health and safety and if necessary will review the risk assessment. Notwithstanding this, a review will be carried out for each trimester of a pregnancy. In addition to the above, **Norman Lewis** will ensure there is a suitable area within the workplace where a new or expectant mother can take a break and rest.

4.2.3 Smoking

The Company operates a no smoking policy throughout the building and smoking by employees is not permitted directly outside the front of the building.

4.2.4 Alcohol & drugs

Consumption of illegal drugs and consumption of alcohol is not permitted before or during employee hours of work, including lunchtimes. Nor must employees be under the influence of alcohol or illegal drugs during working hours or whilst conducting any business on behalf of the **Norman Lewis**.

Employees must inform their line managers if they are taking prescription drugs that may affect their work.

4.2.5 Working time directive

Norman Lewis will take all reasonable steps to ensure that employees are not required to work more than an average of 48 hours a week based on a 17 week period, unless they have signed an opt-out agreement. Where employees who have not signed an opt out agreement are identified as working more than a 48 hour week, **Norman Lewis** will take appropriate steps to reduce that persons working hours where possible.

4.2.6 Stress

Norman Lewis is committed to the health, safety and welfare of its employees and recognises that workplace stress is a health and safety issue. The company acknowledges the importance of identifying and reducing workplace stressors. Where employees demonstrate symptoms which could be related to stress the Directors will investigate with a view to identifying and reducing workplace stressors where possible.

4.3 Health and Safety Administration

4.3.1 Consultation with employees

Norman Lewis acknowledges its responsibility to make available to all employees information relating to their Health and Safety at work. In particular, employees will be advised about:

- The introduction of any measure at the workplace, which may substantially affect the Health and Safety of those employees;
- The arrangements for appointing/nominating persons to assist the employer in complying with relevant legislation and to assist in emergency procedures as required by regulations 7 and 8 of the Management of Health and Safety at Work Regulations 1999;
- Any Health and Safety information required to be provided under the relevant statutory provisions;
- The planning and organisation of any relevant Health and Safety training;
- The Health and Safety consequences of the introduction of new technology.

4.3.2 Employee information and training

Norman Lewis will identify the skills and knowledge needed for people to do their job in a safe and healthy way. All employees are given training appropriate to their responsibilities in accordance with the Health and Safety at Work Act 1974 etc. Training will be provided for the following situations;

- Induction Training for new employees
- The introduction or modification of new/existing equipment, machinery or technology
- A change in employee position/work activity or responsibility

Training will be prioritised in accordance with legislative requirements, the risk level associated with the training need (i.e. where there is a high risk of harm if training is not carried out), and employees' views and perceptions.

A programme of refresher training will be undertaken to keep employees up to date with legislation and best practice. Any training provided by the company will be formally recorded with a hard copy kept on file.

4.3.3 Risk Assessment

The Management of Health and Safety at Work Regulations require a risk assessment of work activities to be carried out, particularly in areas of medium and high risk. The object of the risk assessment is to pro-actively identify hazards and decide what must be done to reduce the risk of any adverse effect on employees or others.

Risk assessments are to be carried out by competent people, trained to carry out risk assessments and who fully understand the occupational risks involved.

Specific risk assessments must be undertaken for the activities of young people aged 16-18 year and new and expectant mothers and be tailored to their specific areas. Any employee or contractor with identified specific needs may also require an individual risk assessment.

Copies of the written assessments are to be held in the Head Office.

If any medium or high risk tasks are identified in the assessment, the activity must not be undertaken before the level of risk has been reduced or controlled and re-assessed by a competent person.

4.3.4 Control of Contractors

All personnel who work on site must be capable of giving, receiving and understanding written and spoken instructions in English. In the event of contractors being used whose first language is not English, specific arrangements will be made for translating Health and Safety signage and ensuring that they understand the Health and Safety induction. A designated supervisor, proficient in English, must be on site at all times.

Contractors must be informed of their duties under the HSAWA 1974 and reminded that health and safety is a **shared** responsibility.

The importance of reporting near-misses so that action can be taken to prevent an accident occurring must be emphasised to all Contractors.

Contractors must issue their job specific risk assessment and method statement to the Operations Director no later than 72 hours prior to the work commencing. (Except for emergencies).

4.3.5 Accident reporting

Norman Lewis has produced an accident investigation form to allow it to go beyond the guidelines set down in the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR). Any accidents that result in injury sustained from activities undertaken by the company may need to be reported. Accident investigation will be carried out by the Operations Director or a competent Health and Safety Consultant. An Accident Investigation form must be completed for all lost-time injuries, a form can be found in section 5.

If any incidents involving **Norman Lewis** members of staff require reporting to the HSE under RIDDOR, company will conduct an investigation to ascertain the root causes of the incident. From this investigation the relevant risk assessments will be reviewed and additional risk controls implemented if required.

Norman Lewis will report, through the Company Secretary:

- deaths;
- major injuries;
- over-3-day injuries – where an employee or self-employed person is away from work or unable to perform their normal work duties for more than 3 consecutive days;
- injuries to members of the public or people not at work where they are taken from the scene of an accident to hospital;
- some work-related diseases;
- dangerous occurrences – where something happens that does not result in an injury, but could have done;

Contractors remain responsible for raising their own RIDDOR reports and copying them to Norman Lewis.

