

HEALTH & SAFETY POLICY

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HEALTH & SAFETY POLICY, STATEMENT OF INTENT

Directors' Statement

We, at Twinfix, believe that adequate provisions for Health & Safety are essential to working life. To maintain, and continuously improve, a healthy and safe working environment and to prevent injuries, losses, pollution and environmental incidents is not only vital to the Company's efficiency and success, but is also in the best interests of all our employees and their families and any others who may be affected by our activities.

We therefore:

- Recognise and embrace that sound management of Health & Safety is an integral part of managing our business.
- Will achieve a high standard of Health & Safety management and commit to continually improving the standard we achieve, as a minimum standard we will comply with all applicable legislation and other requirements to which the company subscribes.
- Acknowledge that the people who work for and with us are key to the successful management and promotion of Health, Safety & Environmental excellence
- Commit to providing adequate and appropriate resources to implement this policy.
- Commit to providing our employees with access to specialist advice when necessary.
- Commit to regularly setting Health & Safety objectives in support of continual improvement.
- Place the management of Health & Safety as a prime responsibility of management from the Managing Director to first line supervisory staff.
- We will ensure our employees are involved, consulted and participate in order to gain commitment to this policy and its implementation.
- Ensure that this policy is understood, implemented and maintained at all levels throughout the company and amongst others who may affect our activities.
- We will ensure employees at all levels will receive appropriate training and are competent to carry out their job.
- We will periodically review this policy, our management system and our level of legal compliance with a view to using these reviews as a driver of continual improvement.
- We will periodically report our Health & Safety performance internally and to others where relevant

Signed:  , Managing Director

Date: 10th May 2011

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Organisation section - Responsibilities

This section describes the principal responsibilities of all persons within the organisation, additional specific responsibilities are also contained within company procedures, work instructions, job descriptions and the arrangement section of this policy.

1. Managing Director (MD)

The MD has overall responsibility for ensuring that the Company Health, Safety & Environmental Policy is effectively applied. In order to achieve this, the MD is responsible for;

- Ensuring adequate resources are made available to implement this policy.
- Holding senior managers and Directors accountable for the implementation of this policy.
- Review this policy for adequacy on at least an annual basis or sooner in the event of an incident that questions the policy's adequacy.
- Ensuring Safety, Health & Environmental matters are considered in all business decisions.
- To take a lead in the investigation of incidents that resulted in or may have resulted in serious injury.
- Regularly visit sources of information such as the HSE or EEF websites to identify forthcoming changes in legislation and coordinate plans to address these changes.
- **VISIBLY** demonstrating his commitment to HS&E; means for achieving this include:
 - Visiting and inspecting the workplace
 - Involvement and resource provision in relation to corrective actions
 - Attendance at Safety meetings
 - Initiating discussion and debate regarding HS&E at all levels within the organisation.

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2. Installations Director

The Installations Director has overall responsibility for the implementation of this policy throughout the installation process. In order to achieve this, the Installations Director is responsible for:

- Working closely with the Design & Technical Director to ensure that hazards and risks are considered and designed out where possible.
- To take a lead in the investigation of incidents that resulted in or may have resulted in serious injury.
- Ensuring that staff under his control have clearly defined responsibilities with regard to their Health and Safety responsibilities.
- Holding staff under his control accountable for their assigned Health and Safety responsibilities. .

- Ensure all staff under his control are competent to carry out their assigned roles and where this is not the case identify further training required.
- Ensure that sub contractors appointed have the necessary skills and experience to carry out installation work in a safe manner (joint responsibility with the Design & Technical Director and Planning Director).
- Ensure that work equipment provided for installation is suitable for the task and that maintenance and inspection requirements are defined and implemented. (Joint responsibility with the Design & Technical Director and Planning Director).
- **VISIBLY** demonstrating his commitment to SH&E, means for achieving this include:
 - Visiting and inspecting the workplace to ensure that Twinfix procedures are followed.
 - Involvement and resource provision in relation to corrective actions.
 - Attendance at Safety meetings.
 - Initiating discussion and debate regarding SH&E at levels within the organisation.

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3. Design & Technical Director

The Design and Technical Director has overall responsibility for ensuring that Health and Safety matters are considered and managed throughout the design process. In order to achieve this, the Design and Technical Director is responsible for:

- Ensuring staff under his control have clearly defined responsibilities with regard to their Health and Safety responsibilities
- Holding staff under his control accountable for their assigned Health and Safety responsibilities.
- Ensure all staff under his control are competent to carry out their assigned roles and where this is not the case identify further training required.
- Regularly consulting with installation and manufacturing personnel with a view to identifying where risks can be reduced or eliminated at the design stage.
- Arranging structural studies on all designs to ensure they will result in a structurally sound installation.
- Regularly visiting installation sites to identify installation problems that are caused by or could be improved by product design.
- Ensure that important safety considerations are clearly communicated in installation instructions and cover site specific risks identified in the risk assessment.
- Ensure that work equipment provided for installation is suitable for the task and that maintenance and inspection requirements are defined and implemented (joint responsibility with the Installations Director and Planning Director).
- Ensure that sub contractors appointed have the necessary skills and experience to carry out installation work in a safe manner (joint responsibility with the Installations Director and Planning Director).

- **VISIBLY** demonstrating his commitment to HS&E, means for achieving this include:
 - Visiting and inspecting the workplace to ensure that Twinfix procedures are followed.
 - Involvement and resource provision in relation to corrective actions
 - Attendance at Safety meetings
 - Initiating discussion and debate regarding HS&E at levels within the organisation

4. Administration Director

Is responsible for the following

- Administration of training records when received from Directors and managers.
- Managing the provision of occupational health, both for routine activities such as audiometric testing and one off consultations.
- Ensuring that disciplinary procedures are correctly applied when company procedures have been contravened.
- Act as a deputy to the safety adviser in relation to RIDDOR reporting.
- Ensuring the office environment is subject to suitable and sufficient risk assessments and that all necessary precautions have been implemented

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5. Planning Director

The planning director has overall responsibility for ensuring that Health and Safety matters are considered and managed throughout the planning process, in order to achieve this, the Planning Director is responsible for:

- Ensuring staff under her control have clearly defined responsibilities with regard to their Health and Safety responsibilities
- Holding staff under her control accountable for their assigned Health and Safety responsibilities
- Ensure all staff under her control are competent to carry out their assigned roles and where this is not the case identify further training required.
- Ensuring risk assessments and method statements for all jobs are collated, stored and where applicable sent to the customer
- Ensure that site and installation related health and safety documentation including COSHH data is kept up to date.
- Ensure that work equipment provided for installation is suitable for the task and that maintenance and inspection requirements are defined and implemented (joint responsibility with the Installations Director and Design & Technical Director).
- Ensure that sub contractors appointed have the necessary skills and experience to carry out installation work in a safe manner (joint

responsibility with the Installations Director and Design & Technical Director).

6. Operations Manager / Health & Safety Adviser

The operations manager has overall responsibility for the safety of the manufacturing & warehousing parts of the organisation. In order to achieve this, the Operations Manager is responsible for:

- Ensuring all aspects of manufacturing and warehousing are subject to suitable and sufficient risk assessments and that all necessary precautions are implemented.
- Ensuring staff under his control have clearly defined responsibilities with regard to their Health and Safety responsibilities.
- Holding staff under his control accountable for their assigned Health and Safety responsibilities.
- To take a lead in the investigation of incidents that resulted in or may have resulted in serious injury, assist other directors and managers in investigations of incidents in their areas of responsibility.
- Ensure all staff under his control are competent to carry out their assigned roles and where this is not the case identify further training required.
- Ensure that work equipment provided for manufacturing and warehousing is suitable for the task and that maintenance and inspection requirements are defined and implemented.
- Ensure that all reportable incidents are reported to the Health & Safety Executive in a timely manner.
- Regularly visit sources of information such as the HSE or EEF websites to identify forthcoming changes in legislation and coordinate plans to address these changes where they may affect manufacturing and warehousing installations.
- **VISIBLY** demonstrating his commitment to HS&E; means for achieving this include:
 - Visiting and inspecting the workplace (Manufacturing & Installation) to ensure that Twinfix procedures are followed.
 - Involvement and resource provision in relation to corrective actions
 - Attendance at Safety meetings.
 - Initiating discussion and debate regarding HS&E at levels within the organisation.

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7. All supervisory staff

Supervisory staff are assigned day to day responsibility for ensuring that all Twinfix procedures are followed by staff under their control. In order to achieve this supervisory staff are responsible for:

- Making themselves aware of and contributing to risk assessments carried out on activities they are involved in.

- Making themselves aware of and contributing to any company procedures, rules or work instructions relevant to their areas and ensure staff follow them.
- Ensuring staff under their control are shown the risk assessments for the activities they are engaged in.
- Bringing to the attention of management any deficiencies in risk assessments or workplace safety arrangements.
- Stop work if they believe there is an imminent and serious threat to health & safety.
- Fully investigate any concerns or queries raised by employees and communicate these concerns to management if they cannot be resolved at supervisory level.

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8. All employees

Responsibilities of employees include:

- Making reasonable efforts to protect their own and others' safety through their acts or omissions.
- Complying with all safety rules, procedures or work instructions and cooperate with their implementation.
- Bringing to the attention of their supervisor / Manager of any conditions or activities they consider to be unsafe and offer suggestions for improvement.
- Making positive efforts to understand the risk they encounter in the workplace and the precautions they should follow.
- Using correctly the means and facilities provided for safety and health at work.
- The duty to refrain from the wilful misuse or interference with anything provided in the interests of health, safety and welfare at work and any action that might endanger oneself or others.
- Making themselves familiar with and conform to the Twinfix Health and Safety and related procedures.
- Reporting all accidents and damage in their department to their supervisor, where persons are injured or not. This includes Company vehicles.

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1. 1st aid provision.

A site first aid needs assessment is carried out annually. This assessment covers:

- Previous accident history.
- Numbers of employees.
- The types of injuries possible and the likely severity.

Based on this assessment a number of first aid staff have been trained and appointed.

When planning shift or team structure, consideration will be given to each team to ensure that there is an even spread of first aid staff on each shift or team.

We track the dates of first aid training received and in a timely manner arrange refresher training for first aid staff. Fully trained first aiders and appointed persons have annual half day refresher training and 3 day requalification training takes place every 3 years..

All first aid training and refresher training is logged on the Company S drive.

We will ensure that an adequate supply of first aid equipment and facilities is maintained.

First Aid boxes are situated in the warehouse, manufacturing areas and office areas. Additionally first aid supplies are carried in all company vehicles.

The qualified first aiders are:

Tom Mairs	Shop Floor
Paul Warburton	Shop Floor
Laura Fairbrother	Office
Nick Featherstone	Office
Paul Shaw	Site
Paul Redican	Site
Joseph Crotty	Site
Jason Maire	Site

Subcontractors

Twinfix require all sub contractors working directly for them to supply at least one person fully trained in first aid, to be in attendance at each working site. If this is not possible then we will ensure that the main contractor has first aiders available when our teams are on site.

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2. Accident / incident investigation

Following an accident the first aider is responsible for ensuring the accident book is completed. (The accident book is used to only record details of the injury and any treatment given.)

Notification of the accident is passed to the **Department Manager** in charge of the injured person who has the responsibility to arrange for an investigation.

The length and complexity of an investigation will be dependant on the seriousness of the incident.

For potentially serious incidents a team approach will be used to investigate the incident.

Actions will be recorded on a root cause analysis form along with responsibility and time scales.

Any relevant risk assessments will be reviewed as part of the investigation.

The company Safety Adviser will report any RIDDOR reportable injuries.

For near misses a *near miss report form* will be completed and similar process followed as detailed above.

All blank accident root cause/near miss report forms are stored on the company S drive.

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3. Competent advice

Under Regulation 7 of the Management of Health & Safety at Work Regulations 1999 the company is required to appoint one or more persons to assist in the undertaking of measures required to comply with legislation.

The following persons have been formally appointed under Regulation 7.

- **Graham Kench**, Managing Director – Many years' practical experience in the manufacture and installation of company products. IOSH Managing Safely Certificate.
- **Steve Western**, Installations Director – Many years' practical experience in the installation of company products. IOSH Managing Safely Certificate.
- **Dan Smith**, Design & Technical Director - Qualified mechanical engineer with 4 years' experience in design and installation of company products.
- **Dave Robinson**, Design Supervisor – Qualified draughtsman. IOSH Managing Safely Certificate, Company Fire Marshall
- **Paul Greenfield**, Operations Manager – Many years' practical experience in the manufacture and installation of company products. Also holds the NEBOSH certificate.
- **Sue Judd**, Administration Director - holds the "Operators Licence" for Transport. Also IEMA Approved Acorn Environmental Management System Implementation Phase 3
- **Sarah Mallen**, Planning Director – Management and coordination of site work. IOSH Managing Safely Certificate.
- **Luke Worrall**, Design – Many years' site and factory experience. IOSH Managing Safely Certificate.
- **Amanda Hancock**, Site Planning – Administration and coordinating of site work. IOSH Managing Safely Certificate.
- **Engineering Employers Federation North West**, group of 4 CMIOSH qualified Safety Advisers with a wide range of industrial experience, also have access to EEF national resources (approx 50 CMIOSH qualified advisers and specialist advisers employed in London), the only consultancy which has a formal partnership with the Health & Safety Executive.

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4. Consultation / communication arrangements

The following means (but not necessarily all) will be used to consult and communicate with employees regarding Health & Safety issues:

- Involvement of employees when carrying out risk assessments.
- Involvement of employees when preparing procedures related to Health & Safety
- Formally appointed safety committee with agreed objectives and charter
- Involvement of employee when introducing new equipment and working practices
- Involvement of employees in incident investigations
- Quarterly communication meetings chaired by the MD includes an open forum where anybody can raise Health & Safety issues.

We hold regular safety committee meetings and employee team meetings.

All management and supervisory staff operate an “open door” policy in relation to health and safety matters.

We will provide our representatives with adequate training in order for them to carry out their duties effectively. All representatives have been trained in IOSH workforce involvement for H&S representatives.

Representatives of Twinfix Employees Safety (RoES):

Shop Floor Representatives

Tom Mairs
Colin Holbrook
Paul Warburton

Office Representatives

Amanda Hancock
Nick Payton
John Bolt

Installation Representative

Paul Redican
Jason Maire

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5. Contractors

- Site installation work
 - General installation contractors

Twinfix limits the number of Sub Contractors used in order to ensure work carried out on our behalf of Twinfix is carried out to our required standards, whilst observing all necessary Health and Safety procedures. Twinfix has built up long term relationships with its Sub Contractors and has been instrumental in setting up the two Sub Contractors who carry out work on our behalf.

Due to the specialised nature of our operations we **do not appoint** sub contractors without first working closely with them to ensure ourselves of the safety and quality of their work.

We also require these Sub Contractors to provide the following:

- Risk assessments for the installation work assigned to them
- Method statements for the installation work assigned to them
- CIS Tax Information.
- Public Liability and any other required Insurance.
- HSE skill cards
- Suitable tools and access equipment (compliant with our working at height policy)
- PAT testing registers
- CRB enhanced disclosure checks
- PPE Equipment and first aid training

We will carry out spot checks on the safety and quality of our sub contractors' work by means off site visits and inspections.

- Specialist contractors

Occasionally we will employ specialist contractors where we do not have in-company the competence or equipment to carry out the work ourselves. Examples of such work include:

- Groundwork i.e. installing foundations for our structures
- Installation of roller shutter doors

We will subject these contractors to the same regime as for our general installation contractors (see above) and contractors working in our factory.

- **Factory work**

Only contractors who have been formally assessed will be permitted to work on site. It is the responsibility of the person wishing to engage the contractor to arrange an assessment of the contractor.

Contractors who have been formally assessed will be entered on to an approved contractors list. No order will be placed with any company who is not on this approved list.

A risk assessment is required for all contractor activities carried out on site.

A method statement is required for all contractor activities. The statement should be a step by step guide to how the job will be carried out and how the main precautions identified in the risk assessment will actually be implemented.

All contract work will be supervised by a named Twinfix employee who has specific responsibilities to:

- Ensure the work is carried out according to the contractor's method statement.
- Ensure a valid permit to work is completed for all contractor activities.

- **Low risk contractors and visitors**

We will deal with low risk contractors in a sensible manner and may not subject them to the full range of checks identified as above. Examples of low risk contractors would include:

- Photocopier service engineer.
- Contractors visiting site to quote or measure up (provided they are accompanied by Twinfix staff).
- Finance auditors working from our Accountants.

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6. Control of substances hazardous to health (COSHH)

Normal company activities generally involve little use of hazardous chemicals. Where we do use hazardous chemicals the frequency of use is low and the quantities involved are low. We will not permit any substance to be used unless the following has been complied with:

- We will formally identify all substances that need a COSHH assessment. A list of hazardous substances that are used will be maintained by the safety adviser.
- We will undertake a COSHH assessment on all materials, taking into account their inherent properties and the way in which we use them. Generally this will be carried out by the safety adviser.
- We will ensure that all actions identified in the assessments are implemented.
- We will ensure that all relevant employees have access to the COSHH assessment and material safety data sheets.
- Fit testing will be carried out on all employees who are required to wear negative pressure respirators.
- Any Local Exhaust Ventilation (LEV or “extract”) systems are subject to regular maintenance and cleaning and have been thoroughly examined within the last 14 months.

Continued efforts will be made to substitute harmful substances with less harmful ones when the opportunity arises.

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7. Display screen equipment

A list of computer workstations on site will be prepared and kept up to date.

All workstations will be assessed against the essential requirements criteria as laid down in the regulations. During this assessment we will determine if the people who use the workstation are classified as “users” under the Regulations.

As a minimum standard all workstations will include:

- Fully adjustable chair.
- Separate keyboard and mouse.
- Adequate desk.

We will provide guidance and instructions to employees regarding the importance of frequent short breaks when using DSE (display screen equipment) for long periods of time.

Employees will be informed of our arrangements for obtaining eye tests and the circumstance where the company will contribute to the expense of glasses.

We will inform and train our employees in risks associated with DSE use and the actions they should take to minimise the risk, particularly the importance of short, frequent breaks.

Blank desk assessment forms are stored on the Company S Drive

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8. Electrical safety

- **Portable**

All portable electrical equipment on site will be listed on a register of electrical equipment in use.

With reference to HSE guidance on the testing, inspection and maintenance of portable equipment, we will assess all portable equipment and determine the scope of checks and the required frequency. Generally all site equipment will be tested at least every three months.

All inspection and testing will be carried out by competent external contractors or our fully trained internal assessor (Luke Worrall).

An identity sticker will be attached to all portable appliances with the date of inspection and the next date an inspection is due. We will not use equipment which is out of date.

No employee-owned equipment will be permitted on site unless inspected/tested first.

- **Fixed electrical**

A register of fixed or non-portable electrical systems will be maintained.

For each system the maintenance and inspection requirements will be determined. The most significant item requirement will be a five-yearly inspection and test of fixed wiring on site.

External contractors will be used to carry out the maintenance. Inspection work will be carried out by competent external contractors

An identity sticker, or similar means of identification, will be used to identify each item.

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9. Fire safety

We will ensure that a fire risk assessment is carried out on all premises under our control and implement any precautions identified in the risk assessment.

A procedure and instructions are in place to describe the actions that should be taken in the event of a fire. These are covered during staff inductions. We will hold at least two drills per year (one announced and one unannounced).

All employees will be provided with basic training covering fire theory and prevention.

All fire related systems (extinguishers and alarm systems) will be maintained according to the manufacturer's recommendations. This is assured by the employment of specialist contractors.

A Fire Marshall will be appointed with a team of wardens with specific duties to carry out in the event of a fire. The Marshall & wardens have been provided with specific training in order to enable them to carry out their duties (i.e. practical fire extinguisher training).

A procedure will be implemented to ensure that all persons who come onto site are informed of the actions they should take in the event of a fire. These are also documented on the back of all visitors' badges.

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10. Legionella

A site assessment has been carried out on all systems on site with the potential to create a Legionella risk. (External contractors were used to carry out this assessment)

The assessment determined that due to no storage of still water on site that there were no control measures required.

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11. Lifting equipment

Note: This section **does not** cover equipment used for lifting persons – see section covering “working at height”.

A risk assessment will be carried out on all mechanical lifting activities.

Based on the findings of the risk assessment, safe lifting plans will be prepared and implemented for all lifting activities.

The safe working load for all mechanical lifting equipment will be clearly marked.

Based on the findings of the risk assessment, the type and frequency of inspections and examinations will be defined and carried out.

No one will be permitted to use any type of lifting equipment unless they have been appropriately trained.

Supervision will be provided appropriate to the risk that the individual piece of mechanical lifting equipment poses.

Lifting equipment inspection forms are saved on the Company S Drive

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12. Machinery guarding

All machinery will be subject to a risk assessment (for complex machinery a specialist work equipment assessment will be completed, for simple machines the risks present will be recorded in a general risk assessment).

Suitable and well-made guards or protective devices will be fitted to machinery as dictated by the risk assessment and external standards and guidance.

The maintenance and inspection requirements for guards and protective devices will be defined and implemented. Records will be maintained for at least six months.

Operating procedures and rules will be established to minimise the risks from moving machinery.

All machines will be subjected to a recorded check the first time the machine is used in a shift.

Strict prohibition of removal of guards or protective devices unless authorised by senior management for a justifiable reason. In these instances specific risk assessments and method statements would be carried out.

Daily machine check forms are stored on the Company S Drive

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13. Material storage – Racking

We will ensure that all racking that is installed is designed by a competent engineer experienced in racking and that safe working load (SWL) notices are displayed on all racks. We will ensure that the loading instructions are complied with and that racks are not overloaded beyond their SWL..

We will ensure all employees are made aware of the dangers of racking and are informed of common faults and are told to whom they should report any damage.

Any racking suffering significant damage will be immediately unloaded and notices posted to prevent further use until repairs have been made.

We have trained one of our employees (Colin Holbrook) to carry out in-house rack inspections and have tasked him to carry these out one a month.

On an annual basis we will contract a specialist company to undertake a detailed safety inspection on our racking.

Racking inspection forms are stored on the Company S Drive

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14. Monitoring & supervision

Monitoring health and safety performance is essential to provide management with information about the effectiveness of the Safety Management System. To check our working conditions, and ensure our safe working practices are being followed, we carry out the following:

Factory work

- We employ full time supervisors & managers who have been assigned specific responsibility for monitoring the working methods of persons under their control.
- We will carry out formal regular safety inspections of the factory. These will focus on unsafe conditions and methods of work.

Site installation work

- We have developed a site specific checklist covering the key checks that are made when undertaking a site inspection.
- A percentage of our jobs will be subject to inspection by a senior member of staff. Records will be generated by completion of the checklist detailed above.

In addition to the above, we will keep a close watch on the following to determine possible problems with our standard of safety management:

- Frequency and severity of accidents or ill health.
- Sickness/absence rates.
- Complaints from clients or principal contractors.
- Concerns or complaints raised by employees.

Completed and blank site inspection forms are stored on the Company S Drive

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15. Noise

On a regular basis (approximately every three years or earlier if a significant change occurs) a noise exposure assessment will be carried out in accordance with the Noise at Work Regulations.

Based on the results of the assessment, areas where high noise levels can or do occur will be clearly signed.

Whenever reasonably practicable, engineering means will be used to reduce noise levels.

Personal Protective Equipment (PPE) will be only used as a last resort or as an additional measure to complement engineering noise reduction techniques. The suitability of hearing protection in use will be considered when carrying out the noise at work assessment.

Basic training in noise hazards, engineering controls and the use and care of PPE will be provided to all persons exposed to high noise levels

Routine audiometric testing will be given to all employees exposed to high noise levels.

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16. Occupational road risk

A risk assessment has been carried out on occupational driving.

Drivers of vehicles will be responsible for arranging maintenance of their vehicles according to the maintenance schedule.

A system of recorded monthly inspections is in place for company vehicles.

For private vehicles used for business purposes, minimum criteria for the age and standard of private vehicles will be set up. Cars not meeting the minimum criteria will not be permitted for use on company business.

Suitable emergency equipment will be provided in all company vehicles

The use of mobile phone whilst driving will be strictly prohibited other than in genuine safety related emergencies (also applies to hands free kits).

We will plan for all regular driving personnel to complete a defensive driving course

Company vehicle inspections are stored on the Company S Drive

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17. Occupational stress

The company will provide confidential counseling for staff affected by stress caused by work factors.

The company will provide adequate resources to enable managers to implement the company's agreed stress management strategy.

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18. Risk assessments and safe systems of work

Key supervisory and management staff have been trained in carrying out general risk assessments.

A number of generic risk assessments have been completed covering risks encountered in typical or common tasks.

Supervisory and management are responsible for ensuring that no work commences unless all of the required precautions have been implemented.

A procedure has been developed that describes how we will carry out risk assessments for installation and factory work. The general risk assessment will identify and assess relatively simple risks and indicate where specific assessments may be required.

When required, the following specific risk assessments will be carried out:

- Fire risk assessments.
- Manual handling assessments.
- Repetitive Strain Injury (RSI) assessments.
- Display screen equipment (DSE) assessments.
- Workplace transport assessments.
- Control of Substances Hazardous to Health (COSHH) assessments.
- Work equipment risk assessments.

A procedure and blank form for each of these has been developed and is available on the Company S Drive.

Risk assessments will be reviewed following any significant changes in the activities carried out, the equipment used or after a near miss or accident.

Safe systems of work

Where we carry out work where the method of working is important for safety, we will develop written safe systems that describe how that work should be carried out safely and these will be communicated to all applicable staff. Copies of these documents will be stored on the Company S Drive

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19. Safety training

The workforce is split up into distinct groups. All training required and implemented will be recorded for each group.

All new employees will be provided with basic induction training on their first day. During this induction training future training requirements will also be identified.

Most training will consist of short training sessions carried out internally, although specialist training will be employed when internal expertise and experience is not available to provide the training in-house.

All training will be followed with a short test to ensure trainees have understood the training given.

Records of all training provided will be maintained at head office, administered by the company secretary.

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20. Working at height

- *“Work at height means work in any place, including a place from which, if appropriate precautions were not taken, a person could fall a distance liable to cause personal injury; and any reference to carrying out work at height includes obtaining access to or egress from such place while at work.”*

This policy will apply to all activities except where work is carried out from a fully edge protected permanent platform.

Typical working at height activities found at Twinfix:

- Use of ladders.
- Use of cherry pickers/scissor lifts.
- Unloading/loading vehicles.

A generic risk assessment and procedure for the use of each has been prepared. Together these describe the key risks associated with each type of working at height and the precautions that need to be taken.

The generic assessment has been used to develop a checklist that assists us in carrying out a site-specific assessment before each type of access equipment is used.

Maintenance and inspection requirements will be defined for each type of access equipment and responsibility for these inspections will be clearly defined.

Only persons who have had appropriate training will be permitted to use any of the access equipment listed above. IPAF and PASMA accredited training will be provided to operators using powered access equipment and pre fabricated scaffolds.

We will regularly monitor activities involving working at height to ensure the correct equipment is being used according to our procedures.

We have trained some of our employees in the use of harnesses but will regard their use as a last resort or additional support when we are unable to implement collective protection.

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21. Work equipment

All equipment will be assessed for suitability i.e. lifting equipment rated and tested for the load to be lifted; equipment suitable for flammable atmospheres; equipment suitable for harsh environments.

Maintenance and inspection requirements will be determined for all work equipment.

See policy regarding guarding of machinery for details of how precautions will be implemented against contact with dangerous parts of machinery.

Training, procedural & information needs for work equipment will be defined and where appropriate recorded in writing for issue to staff.

Work equipment controls will be assessed for their suitability.

Where appropriate, procedures will be developed to manage safety during use or during maintenance activities.

Work equipment will be assessed for the need for audible and visible signs/warnings.

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22. Workplace transport

A risk assessment of the site has been carried out, looking for areas/activities where there is a risk of vehicle and pedestrian collision.

Based on the findings of the risk assessment, precautions will be implemented. The types of precautions that will be implemented include:

- Barriers.
- Crossing points.
- Marked walkways and vehicle routes.
- Warning beacons and audible alarms.
- Written procedures for high risk tasks.
- Speed limits.
- Provision of mirrors.
- The wearing of high visibility clothing.

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23. Waste storage, disposal & recycling

We only use reputable contractors to collect and dispose of our waste.

We obtain copies of relevant licences for all companies we use and check the validity of these licences by checking on the Environment Agency website.

Our principal waste streams and methods of disposal are:

- **Aluminium off cuts**, stored on site until sufficient quantity has been gathered, and then collected by “Tom Martin” for recycling.
- **Polycarbonate off cuts**, stored on site until sufficient quantity has been gathered, and then collected by “Polymer Recovery Ltd” for recycling.
- **Cardboard waste**, stored on site until sufficient quantity has been gathered, and then collected by “Severnside” for recycling.
- **Wooden pallets**, stored on site until sufficient quantity has been gathered, and then collected by “Hadfields” for reuse.
- **General waste** that can not be recycled is stored on site and subsequently collected by “B&M”.

Our waste is stored in containers supplied by each of the waste companies. These are located in our securely fenced yard.

Waste transfer notes are obtained for each waste collection and are stored on site indefinitely.

It is our policy that we leave no waste on our installation sites. All waste is brought back to our Warrington site for recycling or disposal. If a site main contractor has adequate disposal/recycling facilities on site then these may be utilised

Hazardous waste

We do not produce any hazardous waste as a result of our principal activities but do occasionally produce small quantities of hazardous waste such as empty aerosol cans, empty flammable liquid containers and old electrical equipment.

Such waste is collected and stored on site in a safe location. Reputable companies are then approached and asked to quote for disposal. As part of this process we run an Environment Agency check to ensure that the companies involved are licensed to handle and dispose of our hazardous waste.

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24. Spills

As we have a busy factory yard we have recognised that there could be a spillage of diesel fuel in our yard. If this was to occur the diesel may enter site drainage and there is a chance that local watercourses may be affected and the company subject to enforcement action.

We have purchased a spill kit suitable for handling diesel spills and have located this in our yard area.

Employees who regularly deal with delivery vehicles have been provided with information and training regarding the use of the spill kit.

25. Manual Handling

Risk Assessments of manual handling activities have been carried out and suitable risk controls implemented. These assessments have been carried out by the relevant personnel within each area.

When new products are introduced manual handling risk assessments will be completed to ensure safe handling is carried out.

Suitable PPE will be provided to staff to assist with safe manual handling.

Staff will be trained through tool box talks.

26. Vibration

Evaluating Risks to Twinfix operatives

Twinfix will work within the Control of Vibration at Work Regulations 2005 to ensure operatives work within the statutory limits of exposure. We will assess and manage the risk to the workforce's health and provide suitable equipment that is designed to limit the exposure level of vibration.

Monitoring & reducing the risk to Twinfix operatives

Twinfix will monitor the usage of tools on site to ensure that the Exposure Action Value (EAV) does not exceed 100 points in any one day; the Exposure Limit Value (ELV) does not exceed 400 points in a day, and that steps will be taken to remove operators from jobs if they exceed 100 points regularly.

27. Asbestos

Evaluating Risks to Twinfix operatives

Twinfix will ensure the identification of asbestos is addressed prior to operatives attending site to carry out installation works. Asbestos reports will be requested for all sites and site specific method statements produced to take into account the asbestos report findings.

As standard Twinfix employees will not deal with asbestos and if asbestos is suspected to be present then all works will be halted until fully qualified personnel have assessed the site and confirmed works are safe to continue.