

**MBarron Consulting Limited**

# **Health, Safety & Environment Policy**

MBCL.09.PCY001

Issue: 1.0

Status: Final

1<sup>st</sup> December 2009

Authors:

---

Matt Barron – MBCL Director

Checked by:

---

Yvonne Barron – MBCL Secretary

## Table of Contents

<b>1</b>	<b>STATEMENT OF INTENT</b>	<b>3</b>
1.1	Overview	3
1.2	Responsibilities and protection for staff	3
1.3	Responsibilities and protection for visitors and the public	4
1.4	Binding	4
1.5	Environmental impact	4
<b>2</b>	<b>HEALTH &amp; SAFETY POLICY</b>	<b>5</b>
2.1	Key points	5
2.2	Duties, Roles and Responsibilities	5
<b>3</b>	<b>ENVIRONMENTAL POLICY</b>	<b>9</b>
3.1	Key points	9
3.2	Duties, Roles and Responsibilities	9
<b>4</b>	<b>HSE ARRANGEMENTS AND PROCEDURES</b>	<b>11</b>
4.1	HSE Risk Assessments	11
4.2	Specific Operational Policies and Procedures	11
4.3	Visitors to Company Premises	12
4.4	Reporting and Investigating of Accidents and Dangerous Occurrences	12
4.5	Training	12
4.6	Consultation	13
4.7	Review	13

# 1 Statement of Intent

## 1.1 Overview

MBarron Consulting Ltd (MBCL) is fully committed to meeting its responsibilities under the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999 (as amended), and associated protective legislation, both as an employer and as a company. To achieve those objectives it has appointed designated member(s) of staff to be responsible for Company health and safety; to keep workplace health, safety and welfare procedures under constant review; to liaise with the Health and Safety Executive wherever necessary; and to keep the Company and its Board of Directors abreast of new legislation, EU Directives, Regulations and British Standards, in order to ensure ongoing compliance with the law.

While not a statutory requirement, MBCL is also committed to reducing the environmental footprint of our organisation and seeking positive ways we can contribute to our environment. This policy therefore also covers this commitment.

## 1.2 Responsibilities and protection for staff

The main responsibility for health and safety lies with the Managing Director. The Company is bound by any acts and/or omissions of the Managing Director, any executive director or manager, giving rise to legal liability, provided only that such acts and/or omissions arise out of and in the course of Company business.

To comply with its statutory and common law duties, the Company has arranged insurance against liability for death, injury and/or disease suffered by any of its employees arising out of and in the course of employment, if caused by negligence and/or breach of statutory duty on the part of the company.

Company employees agree, as part of their contract of employment, to comply with their individual duties under both the Health and Safety at Work Act and the Management of Health and Safety at Work Regulations 1999 (as amended) and will cooperate with their Employer to enable him to carry out his health and safety duties under the Act. Failure to comply with health and safety duties, regulations, work rules and procedures regarding health and safety, on the part of any employee, may lead to dismissal in the case of serious breaches or repeated breaches; such dismissal may be instant and without prior warning. Please refer to the disciplinary procedures contained in the written statement of employment provided to all employees on their start date.

In accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995, the Company has instituted a system for reporting accidents, diseases and dangerous occurrences to the Health and Safety Executive, in addition to its statutory duty to provide an Accident Book. The Company will comply with its duties towards employees under the Health and Safety at Work Act and the Management of Health and Safety at Work Regulations 1999 (as amended), so far as is reasonably practicable, in order to:

- Provide and maintain plant and systems of work that are safe and without risks to health, a safe place of work, a safe system of work.
- Ensure the safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances.
- Provide such information, instruction and training and supervision as may be necessary to ensure the health and safety at work of its employees.
- Make regular risk assessments available to employees.
- Take appropriate preventative / protective measures.

- 🌐 Provide employees with health surveillance where necessary.
- 🌐 Appoint competent personnel to secure compliance with statutory duties and to undertake reviews of the policy as necessary.

### **1.3 Responsibilities and protection for visitors and the public**

In order to meet its obligations towards the general public and all lawful visitors to the Company's premises, the Company will pay strict attention to its duties under the Health and Safety at Work Act and the Occupiers' Liability Acts 1957 and 1984.

In order to meet its obligations towards employees and the general public, including personnel on client premises, the Company will ensure that a copy of the client health and safety policy statement is obtained prior to deploying staff to support the client's business, within the terms of the contract agreed and put in place with the client.

### **1.4 Binding**

This policy has been prepared in accordance with Section 2(3) of the Health and Safety at Work etc. act 1974 and binds all Directors, Managers and Employees, in the interests of Employees and Customers. We request that our Customers and Visitors respect this Policy, a copy of which can be obtained on demand.

### **1.5 Environmental impact**

MBCL understands that the activities of its staff can have an impact on the environment. MBCL's environmental policy makes commitments to continuously reduce our environmental impact while seeking ways to positively contribute to the environment.

MBCL shall seek to become and remain compliant with relevant environmental legislation.

All personnel of MBCL shall receive induction and ongoing training in environmental issues and the environmental effects of their activities. All personnel shall be encouraged to operate and act in a sustainable manner.

## 2 Health & Safety Policy

### 2.1 Key points

- MBCL shall comply with all current Health and Safety legislation pertinent to our business activities.
- MBCL shall ensure that all personnel are fully aware of their H&S responsibilities and those of other members of the company.
- MBCL shall actively manage H&S issues and risks.

### 2.2 Duties, Roles and Responsibilities

Individual responsibilities for health and safety are allocated by management position and by designated posts within the organisation.

#### 2.2.1 Managing Director

The Managing Director has ultimate responsibility for ensuring that the Company fulfils its legal responsibilities, that policy objectives are achieved and that effective machinery is in place for the achievement of the policies concerned with health, safety, welfare and environmental protection. He will also ensure that Company policies are reviewed as appropriate in order to secure continuing compliance with existing policies, current legislation and any changes in the law. To these ends, he will ensure the allocation of the resources necessary to maintain sound and efficient health and safety arrangements.

#### 2.2.2 Directors

Directors are accountable to the Managing Director for implementing the Company's Health and Safety Policy, encouraging and assisting in developing safety procedures and ensuring that established rules and safe working practices are adhered to.

With regards to the activities under their control, all such Directors will ensure that necessary consideration is given at all times to the requirements of the Company Safety Policy and, in particular, to the following:

- Safe methods of working.
- Induction training including health and safety matters.
- Welfare facilities.
- Fire precautions.
- Hazards arising from the use of noxious substances, or exposure to noise, dust or fumes.
- Carry out workplace inspections and advise as and when necessary to improve methods of working.
- Investigate accidents and dangerous occurrences and recommend means of preventing recurrence.
- Advise and assist with safety training of personnel.

#### 2.2.3 Managers and team leaders

All managers and team leaders shall be specifically responsible for:

- Ensuring that no activities carried out by Company employees or contractors will create a risk or hazard to customers, customers' property, and/or their employees, other MBCL employees or members of the public.
- Ensuring that all employees and contractors are adequately trained and competent to carry out the work allotted to them without risk.

- Ensuring that where health and safety training needs are identified, arrangements for training will be made as appropriate.
- Ensuring that all Company procedures are adhered to at all times.
- Ensuring that close liaison with any contractors working within the department is maintained in all matters regarding health and safety.

In fulfilling these responsibilities, all managers and team leaders will ensure that:

- This policy is reviewed in the light of their particular operational responsibilities.
- They know their own, and other persons', responsibility for implementing the Safety Policy.
- All accidents and dangerous occurrences are fully investigated and preventive actions are recommended in close liaison with the HSE Manager.
- Safe systems of work are implemented and are adhered to with such safe systems of work being documented.
- They are aware of, and implement, all safe working practices and procedures.
- All necessary arrangements are made and maintained in respect of accident reporting, first aid, fire precautions, etc.
- All relevant statutory records are regularly maintained and inspected.

#### **2.2.4 Employees' and deployed associates Responsibilities**

All employees and deployed associates will ensure that:

- They are fully conversant with this Safety Policy.
- They will cooperate with the Company in meeting its statutory duties.
- They will take reasonable care of themselves and others who may be affected by their acts or omissions.
- No one intentionally or recklessly interferes with or misuses anything provided in the interest of health and safety.
- All accidents, dangerous occurrences and near misses are immediately reported to their manager.
- They are fully conversant with all Fire Procedures applicable to the area in which they are working.
- All equipment provided for personal safety shall be used and maintained in a condition fit for that use, and any defects reported immediately to management.
- Where an employee identifies any condition which in his or her opinion is hazardous, the situation will be immediately reported to their immediate manager.
- During the course of their normal duties, employees and deployed associates will use equipment and facilities that are fit and proper for the intended purpose in a safe, correct manner, as provided within the following categories:
  - Arranged, provided and/or otherwise provided by the Company.
  - Provided by the customer/client with specific authorisation that they may be used by employees of the Company.
  - Provided for unrestricted use by members of the general public.

#### **2.2.5 Competent Persons**

The Company will appoint a number of competent persons to assist in undertaking the necessary measures to comply with the requirements and prohibitions imposed by or under the relevant statutory provisions.

A person shall be regarded as competent when he or she has sufficient training and experience or knowledge and other qualities to enable that person to properly assist in undertaking such measures.

The following members of staff have been designated competent persons for the responsibilities shown:

• Company health and safety policy	HSE Manager
• Procedures for serious or imminent danger	HSE Manager
• DSE assessments	HSE Manager
• Manual Handling Assessment	HSE Manager
• COSHH assessments	HSE Manager
• Administration of all other Risk Assessments	HSE Manager
• Vetting of subcontractors' policies	HSE Manager
• Auditing of health and safety on site	HSE Manager

### 2.2.6 HSE Manager

The HSE Manager is responsible for the provision and dissemination of advice and information to the Managing Director, Directors and staff. He will maintain close contact with the HSE and any other organisations from whom information may be obtained regarding health and safety matters.

He will be responsible for the effectiveness of the safety policy, safety procedures and practices in relation to Company premises, carrying out regular audits and monitoring activities as necessary. He will also arrange for auditing of subcontractors' health and safety performance on Company or Customer premises. The results of such monitoring will be recorded and corrective action, if required, will be undertaken.

In fulfilling these general responsibilities, the HSE Manager has a specific responsibility for:

- Ensuring the Company is aware of statutory obligations and recommended Codes of Practice by interpreting and keeping management and employees informed of new and developing legislation and other standards.
- Advising management of their responsibilities for accident prevention and avoidance of health hazards.
- Through line management and supervision, advising where improvements in health and safety standards and practices are appropriate.
- Ensuring that regular health, safety and housekeeping inspections are carried out, covering buildings, plant, equipment, services and fire arrangements, to ensure conformity with regulations and Company policies.
- Advising on possible hazards when considering the introduction of new machinery/work equipment, new materials, new processes, or changes in existing ones.
- Ensuring that all necessary risk assessments required by legislation are carried out.
- Arranging for the provision of written safe systems of work, including where necessary, arranging for the development and use of permit-to-work procedures.
- Arranging for the provision of PPE based on risk assessment, so long as other control measures have been considered prior to doing so and that PPE provision is the last resort.
- Arranging for the provision of written procedures for contractors.
- Ensuring the provision of first aid, fire safety and emergency procedures.
- Ensuring the appointment of competent persons in accordance with legislative requirements.
- Maintaining statutory safety records and making statutory safety returns, in addition to maintaining health and safety records required by the Company.
- Overseeing and reviewing all accident investigations and preparing statistics to assist in monitoring health and safety performance.
- Ensuring that all employees of the Company receive a copy of this policy statement, including new entrants receiving it as part of their induction programme.
- Liaising with all managers recruiting new employees or changing the job descriptions of existing employees in respect of their capability with regards to health and safety.

- 🌐 Identifying health and safety training needs and advising on suitable training programmes.

In addition, where Company employees are given access to, and work within the premises of other organisations or domestic premises, the HSE Manager will liaise with the relevant manager, if required, to ensure that none of the activities performed by employees or contractors will put at risk the health and safety of the employees of those organisations and/or members of the public. Likewise, through close liaison with the users and landlords of any shared premises he will ensure that Company employees are not put at risk by any activities being undertaken within or on the shared premises.

### **2.2.7 First Aiders**

First aiders will be appointed for all Company premises in accordance with the Health and Safety (First Aid) Regulations 1981, as modified and amended 1989, 1997, 1999, 2001, 2002. They will be responsible for the taking of prompt and appropriate action following any accident, whether an employee or not.

First aiders will be responsible for the maintenance of the contents of all first aid kits and ensure that only items specified will be retained in the kits.

## 3 Environmental Policy

### 3.1 Key points

- 🌍 MBCL shall comply with the requirements of environmental legislation and approved codes of practice
- 🌍 MBCL shall assess the environmental impact of all historic, current and likely future operations
- 🌍 MBCL shall continuously seek to improve environmental performance
- 🌍 MBCL shall reduce pollution, emissions and waste from all aspects of its operations
- 🌍 MBCL shall reduce the use of all raw materials, energy and supplies
- 🌍 MBCL shall raise awareness, encourage participation and train employees in environmental matters
- 🌍 MBCL shall expect similar environmental standards from all suppliers and contractors
- 🌍 MBCL shall assist customers to use products and services in an environmentally-sensitive way
- 🌍 MBCL shall participate in discussions about environmental issues.

### 3.2 Duties, Roles and Responsibilities

All personnel in the company share a responsibility for reducing our environmental footprint, and for seeking positive ways we can improve the environment (within the bounds of the companies business and purpose).

#### 3.2.1 Transport

Moving from A to B in order to conduct specific consultancy or management duties has an environmental impact. Where possible personnel should seek alternatives to travel, and only resort to the use of carbon emitting transport if no other agreeable alternative exists.

Personnel should in all cases seek to use the mode of transport that is least environmentally damaging where selection of that means does not have a major negative impact on performance of company business. For example, where available for a given route, public transport shall be utilised in favour of private car.

#### 3.2.2 recycling of packaging materials

Any packaging (from receipt of goods etc) received by MBCL personnel shall be recycled. This shall specifically include paper, cardboard and plastics.

#### 3.2.3 efficient use of water and energy

The company shall ensure that its energy supply is provided under a 'green tariff' scheme I.e. a provider that sources a % of its energy from renewable sources.

All personnel shall ensure that they utilise both water and energy responsibly and seek ways of minimising their use of these resources.

For example, computer devices that are not in constant use shall be switched off at the wall, and not left on standby mode.

#### **3.2.4 use of paper and paper products from sustainable sources**

The company shall minimise the use of paper and paper products in the conduct of operations, and shall instead seek where ever possible to communicate using electronic means.

All paper and paper-based products purchased for use by the company shall be from a sustainable source. This shall include printer paper, envelopes and sticky notelets.

#### **3.2.5 procedures to minimise noise disturbance to neighbours**

MBCL shall ensure that its operations do not constitute a noise disturbance to other commercial or private neighbours.

## 4 HSE Arrangements and Procedures

The following arrangements and procedures shall be put in place to ensure the health and safety of all employees, and others, whilst at work and as affected by working activities, and the effective control of environmental impacts.

### 4.1 HSE Risk Assessments

All premises and activities subject to risk assessments must be assessed in accordance with the relevant legislation using the Company documentation provided.

Such assessments will be repeated whenever any of the following factors occur:

- Change in legislation.
- Change in control measures.
- Significant change in work carried out.
- Transfer to new technology.
- Original assessment is no longer valid.

Assessments will be recorded and records maintained by the HSE Manager. The results of all such assessments will be communicated to and be available for inspection by all employees.

All assessments will identify necessary protective and preventative measures. The Company shall make, and give effect to, any appropriate arrangements for the effective planning, implementation, monitoring and review of any protective measures identified as a result of risk assessments.

### 4.2 Specific Operational Policies and Procedures

All company policies and procedures issued in the interests of health, safety and the environment will be regarded as supplementary to this policy. These include those pertaining to:

- Human Factors engineering.
- Provision of PPE to personnel.
- Fire safety, fire prevention and emergency evacuation procedures.
- Appointment/election of safety representatives and safety committee procedures.
- Control of contractors.
- Company travel.
- Purchasing of goods and services.

Specific procedures will be maintained for ensuring that the following requirements are met.

- That all buildings, plant and equipment meet statutory requirements that any remedial action required is carried out without delay and that any unsafe or environmentally damaging equipment is safely immobilised.
- That all new equipment introduced into any location conforms with statutory requirements.
- That all subcontractors who are to work on or in any of the Company's premises, or for the company in any capacity are made aware of all safety procedures and any hazards applicable to the areas in which they are to work.
- That all fire fighting appliances, detection systems and alarms are regularly inspected and tested and a log retained of the same.

- That the fire procedure is displayed and reviewed at frequent intervals with regular tests of the procedure.
- That no new chemicals/substance will be purchased or brought into the premises until their hazards have been assessed in accordance with the Control of Substances Hazardous to Health Regulations 2002.
- That inspections are made under the Electricity at Work Regulations 1989 of all work activities which use electricity and that, so far as is reasonably practicable, any risk to those who may be affected is removed or reduced.

### 4.3 Visitors to Company Premises

Visitors may not be aware of the risk associated within the site, therefore all visitors must:

- Sign in on arrival.
- Be accompanied by the person they are visiting, who in turn is responsible for the visitor's safety and ensuring that visitors are aware of any hazardous process or situation they may be exposed to.
- On leaving the premises, sign out at Reception.

### 4.4 Reporting and Investigating of Accidents and Dangerous Occurrences

All accidents, no matter how minor, will be reported on the Company Accident Report Form with copies being sent to the Safety Manager.

- All accidents, dangerous occurrences and near misses will be reported immediately to the manager responsible for the site as soon as possible after the event.
- All accidents, dangerous occurrences and near misses will be investigated within 24 hours by the relevant manager.
- The Safety Manager will at periodic intervals analyse the accident statistics and issue a report to all managers identifying trends and common causations.

Where an employee of another company or organisation is involved in an accident, a copy of the Accident Report Form will be sent to his/her employer.

Likewise, where an employee or contractor working on behalf of the Company at another company's premises or otherwise under contract to another company irrespective of location, the other company's accident reporting system must be followed in accordance with their instructions. An Accident Report Form is to be filled out and sent to the Company along with a copy of the other company's record of the incident and actions taken.

### 4.5 Training

To comply with the general duty of care for employees, instruction, training and supervision shall be provided to ensure all personnel are fully apprised of their responsibilities, and those of the company to develop and maintain safe systems of work, and to minimise the environmental footprint of the organisation.

- At inductions.
- Repeat training at regular intervals.
- On transfer or promotion to new duties.
- On introduction of new technology.
- On changes in systems of work.
- When training needs are identified during risk assessments.

Managers at all levels of the Company will be included in the health, safety and environmental training programme.

Records of all health, safety and environmental training will be maintained by the HSE Manager and planned training resource requirements tabled at the next appropriate Senior Management Team meeting.

#### **4.6 Consultation**

Consultation will take place via the quarterly Senior Management Team meeting where matters of health, safety and the environment shall be tabled.

Any employee with a health or safety concern must inform his/her supervisor or manager initially. If, after investigation, the problem is not corrected within a reasonable time, or the supervisor/manager decides that no action is required and the employee is not satisfied with the explanation, the employee may then refer the matter to the HSE Manager who may make representations to the supervisor concerned. This must be done in writing.

Failing resolution at this stage, the matter may be entered on to the Agenda of the next quarterly Senior Management Team meeting at the Chairman's discretion.

#### **4.7 Review**

Notwithstanding the above, this Policy will be reviewed on an annual basis.