

HEALTH & SAFETY POLICY OF



Push Energy

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Push Energy

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1. Scope of Health and Safety Policy

This policy details the general intentions of Push Energy, allocates safety responsibilities to all members of staff and outlines particular arrangements that are in place to implement the policy. The scope covers the company's premises in Colchester, Essex and any place of work that Push Energy (the "Company") are responsible for and or any place of work where any employee or representative of the Company are engaged on company business.

HSG 65 is the preferred method of implementing a Health and Safety management system by the Health and Safety Executive (HSE), audits identify any short falls and allows the basis for a proactive action plan to enable health and safety integrity to be maintained. It is the responsibility of Management to:

- Implement adequate control measures to address noncompliance identified as a result of completing an audit, assessment or inspection
- Support all proactive Health and Safety management programs
- Ensure that all employees within their control with respect to health, safety and environmental management undertake a proactive role.

Formal Review

A formal internal review of the Health and Safety Policy (H&S Policy) and associated procedures will be undertaken every year or:

- When any change within the Company directly or indirectly affects the integrity of the policy.
- When any change to the business operation that directly or indirectly affects the integrity of the policy. Examples:
 - Issues identified from any weekly, fortnightly, quarterly inspections
 - Following an investigation after an accident or incident directly or indirectly involving the Company employees or sub-contractors or products
- When the frequency of any review will be overridden if existing legislation or proposed legislative changes requires a review or prompt action.

Review & Revision			
Version	Details	Date	Approved
0.1	First Revision	July 2018	
0.2	Amended policy statement signees	Dec 2018	
0.3	Amended policy statement signees	March 2019	
0.4	Amended policy statement signees	January 2020	
0.5	Amendments to Organisation and Responsibilities	September 2020	

2. About us

Push Energy Ltd has been established from roots in the Commercial Scale Solar PV, Biomass Heating, and Combined Heat and Power sectors. Our exposure to the fast-changing solar power market has led us to naturally progress into development of field scale solar farms on carefully selected sites.

Push Energy pride ourselves on developing projects from conception to completion. Every stage of the process is managed by an in-house team from the first site meeting with the customer to the planning, construction and commissioning of the project. This hands-on approach throughout allows us to maximize the efficiency of this process.

Our aim is to provide a professional and cost-effective solution to the supply of, and demand for, large scale green energy generation through the use of renewable technologies. To date Push Energy Limited have concentrated in the development and realization of PV power plants of every size from site selection to plant construction and on-going operational and maintenance support.

3. SAFETY POLICY STATEMENT

Health and Safety at Work etc Act 1974

PUSH ENERGY LTD

The following is a description of the type of work that our office staff undertakes:

Description of Work:

General office duties.

General Statement of Policy

As a responsible employer, we recognise our responsibilities for the health and safety of our employees and anyone affected by our actions. We believe our employees have the right to work in safe and healthy conditions. These conditions are created and maintained by having clear health and safety policies systems and procedures.

The Company recognises and accepts the general duties imposed upon the Company as an employer under the Health and safety at Work Act 1974 and subsequent Health and Safety Regulations appertaining to its operation.

Accordingly, we are committed:

- To provide adequate control of health and safety risks arising from our work activities;
- To provide a safe and healthy working environment;
- To consult with our employees on matters affecting their health and safety;
- To provide and maintain safe plant and equipment;
- To ensure safe handling and use of substances;
- To provide information, instruction and supervision for employees;
- To ensure all employees are competent to do their tasks, and to give them adequate training, including refresher/update training;
- To provide personal protective equipment relevant to working tasks;
- To prevent accidents and cases of work related ill health;
- To maintain safe and healthy working conditions; and
- To review and revise this Policy as necessary at regular intervals.

Signed: *D Sydenham*

Date: 9 Sep 20

Name: Drummond Sydenham

Position: Managing Director

Signed: *T Hargreave*

Date: 10 Sep 20

Name: Tom Hargreave

Position: Director Projects

4. ORGANISATION AND RESPONSIBILITIES

4.1 Summary of Responsibilities

1.	Person with the overall and final responsibility for Health & Safety:	Chief Executive Officer
2.	Day-to-day responsibility for ensuring that this policy is put into practice.	All Managers
3.	Ensuring Health and Safety standards are maintained / improved in the following areas: <ul style="list-style-type: none"> • Construction Sites • Overall 	All Managers
4.	Risk Assessments are undertaken by:	All staff attending site
5.	Findings of Risk Assessments are reported to:	All Managers
6.	Person(s) responsible for ensuring the actions required in the risk assessments are implemented.	All Managers Health and Safety Manager
7.	Monitoring and review of Health and Safety by:	Health and Safety Managers
8.	Problems with plant / equipment are reported to:	All Managers
9.	Employees representative for consultation is:	HR
10.	Person(s) responsible for ensuring that new plant and equipment meet health and safety standards:	All Managers
11.	Person(s) responsible for ensuring that all relevant employees are informed about COSHH assessments:	All Managers
12.	Person(s) responsible for checking new substances can be used safely before they are purchased:	All Managers
13.	The Health and Safety Law Poster is displayed at / Health & Safety leaflets issued by:	1&2 Tollgate Business Park, Tollgate West, Stanway, Colchester, CO3 8AB
14.	Health and Safety advice is available from:	Health and Safety Manager
15.	Person(s) responsible for ensuring that our employees, working at locations under the control of other employers, are given relevant Health & Safety information:	All Staff
17.	Induction Training provided to all employees by:	HR/Health and Safety Manager
18.	Health & Safety Training identified /arranged by:	All Managers
19.	The first aid box is kept in / at:	Office Kitchen Area
20.	Checking / replenishing of first aid boxes are carried out by:	All Staff
21.	The accident book is kept by / at	First Aid Kit in Office Kitchen area

22.	Person responsible for reporting accidents, diseases and dangerous occurrences to the enforcing authority:	Health and Safety Manager
23.	Person responsible for investigating work-related causes of sickness absences:	Health and Safety Manager All Managers
24.	Person responsible for acting on investigation findings to prevent reoccurrence:	Health and Safety Manager All Managers
25.	Person responsible for ensuring fire risk assessment is undertaken and implemented:	Health and Safety Manager
26.	Safe exits / escape routes are checked by / every:	All Staff
27.	Fire extinguishers are maintained and checked by / every:	GCS Alarms
28.	Fire alarms tested every week by:	Health and Safety Manager
29.	Emergency evacuation will be tested Bi-annually by:	Health and Safety Manager All Staff
30.	Ensuring fire and evacuation arrangements are implemented, tested and monitored:	Health and Safety Manager All Managers
31.	Work station (DSE) assessments carried out by:	All Staff
32.	Carrying out Specific Risk Assessments:	All Staff
34.	Recording and monitoring of Portable Appliance Testing (inspecting and testing):	MRM Electrical
35.	Ensuring the maintenance, inspection and testing of Work Equipment is carried out and recorded:	All Managers Health and Safety Manager

4.2 Managing Director (MD)

The MD recognises that instilling a health and safety culture within all their workplaces, both within their offices and remotely at all their construction projects is a foundation for proactive management.

The MD is responsible for:

- Ensuring that adequate resources, i.e. financial, training and time are made available to fulfil the legal requirements imposed on Push Energy;
- Ensure all HSE reportable incidents are reported to Push Investment Group within 12 hours of occurring, via the assistant to the CEO, for distribution to the Push Investment Group board;
- Ensure effective safety communications within their business unit. They are required to advise the Senior Management Team on matters that they feel need its attention;
- The allocation of managerial and supervisor's responsibilities;
- Ensuring the integrity of all health and safety systems is maintained at a high standard
- Ensure that, the Senior Management Team, Managers and Supervisors are adequately trained to carry out their Health and Safety duties effectively and that records are kept of training undertaken;
- Ensure the safety performance of each company/department is monitored and take action to remedy any identified deficiencies. Establish procedures to deal with office and site emergencies;
- Before entrusting work tasks to employees and sub-contractors, take into account their capabilities as regards Health and Safety and ensure that suitable risk assessments are carried out of any hazardous activity;
- Ensure that all necessary PPE is provided to employees, within their department, and require subcontractors to obtain and wear PPE (Personal Protective Equipment);
- Ensure that adequate provision is made for welfare facilities on site that meet the relevant regulations and that adequate first aid provisions are made;
- Accepting the agenda and action points set out in "Leading health and safety at work, leadership actions for Directors and Board Members INDG 4173" published jointly by the Institute of Directors and the HSE. that is to Plan the direction for health and safety; Deliver health and safety; Monitor health and safety; and Review health and safety;
- Set a personal example when visiting sites by wearing appropriate personal protective clothing;
- Set a personal example and promote an interest and enthusiasm for health and safety within their business unit;
- Ensuring the development and implementation of the Push Energy Health & Safety Policy;
- Understanding Push Energy's statutory responsibilities affecting all its operations;
- Ensuring that the requirements in the H&S Policy are communicated to all staff;
- Ensuring that disciplinary procedures are in place for anyone contravening H&S standards, including the standards set out in this policy;
- Ensuring Health & Safety is placed on the Agenda at all Board Meetings and treated with the priority it deserves.

4.3 Directors

Although all Directors and Managers have specific duties and responsibilities with regards to Health & Safety, they all have general duties to ensure that health & safety is proactively considered in day to day business including the operations of consultants and subcontractors. The general Health & Safety duties and responsibilities are to:

- Read and understand the Push Energy H&S Policy;
- Review performance regarding health, safety and environmental matters regularly, ensuring responsibilities are satisfactorily discharged;
- Have personal knowledge of the broad requirements of the Health and Safety at Work Act 1974 and Health and Safety Regulations and the HSE Approved codes of Practice;
- Ensure adequate funds are available to ensure compliance with the Health and Safety standards;
- Ensure that all reported accidents are investigated to ensure safe working procedures are in place;
- Ensure personal awareness of health, safety and environmental issues through regular team discussions;
- To ensure that the Health and Safety Policy is updated as required;
- To ensure that professional safety advice is available as required;
- Support and assist the Managing Directors, Responsible for Safety in the execution of their duties;
- Take reasonable steps to familiarise themselves with the hazards and risks associated with the work carried out by the company and with the precautions which need to be taken to eliminate or control those risks;
- Show leadership by setting an example, implementing company rules and procedures, and wearing appropriate personal protective equipment [PPE]; Make recommendations whereby safety of working operations could be improved, reporting any shortfalls to the Push Energy MD;
- Ensure that all employees satisfactorily discharge their Health and Safety responsibilities allocated to them;
- Ensure that all subordinate staff has adequate health, safety and environmental training, including health and safety induction to their workplace, and to the companies' policies and procedures.

4.4 Managers & Supervisors

All managers and supervisors are expected to demonstrate by example their total commitment to health and safety matters.

- Each manager and supervisor are responsible for their personal safety and that of all personnel under his or her authority, including others who may be affected by the Push Investment Group's activities.

In Particular they will:

- Understand and implement the Push Investment Group and their respective Company Health and Safety Policy;
- Appreciate the responsibilities of personnel under their authority and ensure that each employee knows his/her responsibilities and are adequately competent and trained to carry out these correctly;
- Ensure all Statutory requirements, Regulations and Codes of Practice relevant to their work are fully complied with;

- Conduct risk assessments on activities within their department, ensuring that the methods and systems of work are safe and ensure that the necessary procedures, rules and regulations designed to achieve this are formulated, published and applied;
- Provide written instructions of work methods outlining potential hazards and precautions, and ensure they are complied with;
- Ensure accident and near-miss reporting procedures are understood and complied with, and assist with accident investigations where appropriate;
- Ensure all employees and sub-contractors are suitably trained/competent to carry out the prescribed task and that the necessary licenses/certificates of competence are in force and appropriate and ensure that records are kept of training undertaken;
- Ensure that records of driving licences are held to ensure that only those eligible by birth date or qualification can tow a trailer or drive a 7.5-ton vehicle;
- Ensure the Statutory Notices, the Health and Safety Policy, Insurance Certificate and the names of appointed First Aiders are displayed and maintained in prominent locations;
- Ensure that all new employees in the company are provided with a copy of the Health and Safety Policy and are issued with personal protective equipment as required and are aware of their personal responsibilities;
- Reprimand any employee for failing to discharge their health and safety responsibilities;
- Set a personal example with regard to health and safety.

4.5 All employees and Sub Contractors

The Management at Push Energy expects everyone that is employed throughout the business to conduct themselves in a professional and safe manner. To this end it is expected that all employees and subcontractors irrespective of position or employment status within the Company have the same personal responsibility this extends to (but not limited to):

- Taking reasonable care for the health and safety of themselves and of other persons who could be affected by their acts or omissions
- Ensuring that all accidents involving personal injury are recorded into the Accident Book or entering the details of all incidents, dangerous occurrences
- Reporting any accidents or near misses that they experience, or witness, to their Line Manager.
- Co-operating in all aspects of health and safety procedures introduced by Management for their well-being
- Wearing personal protective equipment when conditions require or where identified by risk assessment, method statement or mandatory signage
- Following safe working procedures when handling, storing, using or transporting any COSHH controlled items
- Reporting any medical problems experienced when undertaking any work functions to the Site Manager or direct Line Manager
- Assisting with any investigations or accident reports where necessary
- Maintaining a good standard of housekeeping throughout their areas of work
- Ensuring that work equipment is only used for its intended purpose and that they have been trained to use it
- Not interfering with any equipment provided for their safety

4.6 First Aiders

First Aider's are responsible for administering First Aid within the scope of their training and completing an accident form, in full following administration of treatment. First Aid trained employees have the following responsibilities:

- Ensure that when First Aid is administered that details of the accident are recorded in the Accident Book, and that the completed report is confirmed by the Site Manager (for Construction Sites) removed from the book and passed to the Projects Administrator for distribution and further action;
- Ensure that where First Aid supplies are used that the First Aid box is duly replenished;
- Ensure that a copy of their First Aid Training Certification is provided to the Projects Administrator so that arrangements can be made for refresher training in advance of expiry date.
- Report any incidents or actions taken and inform the Push Energy Health & Safety Manager

4.7 Fire Wardens

Where an employee/contractor is specifically appointed to act as Fire Warden they will have the following responsibilities:

Push Energy Head Office

- In conjunction with the Health and Safety Manager attend fire drills and emergency drills;
- With the Health and Safety Manager ensure the fire-fighting equipment is well maintained and tested;
- Report any faults/problems with firefighting equipment, appliances, escape routes and facilities to the Health and Safety Manager;
- Assist Emergency Services with Role Calls.

See Section Fire Safety

4.8 Health and Safety Manager

The day to day management of health and safety is being managed by the Health and Safety Manager. The Competent Person(s) responsible for the provision of advice, reviewing and auditing policies and associated procedures, providing training and briefings and ultimately ensuring the Company remain in compliance their duties and responsibilities

5. Consultation with Employees

The Company acknowledges its duties to consult with its employees on health, safety and welfare issues. Monthly Board Meetings are held where monthly health and safety reports are included on the Agenda.

If employees have specific health and safety concerns or suggestions these should be brought to the attention of their line Manager or the Health and Safety Manager, as and when required.

The company has a Health and Safety Committee, that meet every quarter and formal minutes are communicated to all employees. The Health and Safety Committee is the platform to discuss current and new company policies and procedures, whilst providing an open discussion for Health and Safety suggestions and ideas, in line with the Push Energy Core Values.

The Company is committed to consult with employees in good time on matters relating to their Health & Safety at work and, in particular, with regard to – The introduction of any measure at the work place, which may substantially affect the Health and Safety of those employees.

1. The arrangements for appointing or, as the case may be, nominating persons in accordance with the Management of Health & Safety at Work Regulations 1999 (R7(1)) and (R8(1)(b)) and the Regulatory (Fire Safety) Order 2005.
2. Any Health & Safety information it is required to provide to those employees by or under the relevant statutory provisions.
3. The planning and organisation of any Health & Safety Training it is required to provide to those employees by or under the statutory provisions.
4. The Health & Safety consequences for those employees of the introduction (including the planning thereof) of new technologies into the workplace.

The above arrangements are part of the Health & Safety (Consultation with employees) Regulations 1996, of which the Company has implemented as part of its Health & Safety arrangements. The Company will make the necessary arrangements to ensure that any non-English speaking employees will be involved in the health and consultation process, providing interpreters if and when required. The MD is in regular contact with all members of staff and will take into account any employees views, before any decisions are made with reference to any measures which may substantially affect their health and safety.

5.1 Equal Opportunities

The Company is an equal opportunity employer and ensures that no employee receives less favourable treatment on the ground of race, sex, religion, belief, colour, nationality, sexual orientation, age, ethnic or national origins, disability, or is disadvantaged by conditions or requirements which cannot be shown to be justifiable. All employees employed directly will require demonstrate that they are able to work within the UK legally in accordance with Immigration, Asylum and Nationality Act 2006 (Section 15-25).

Where an employee has difficulty in speaking or reading English, the Management will identify any hazards and associated risks via risk assessment related to the work that is planned and implement the required control measures to assist any short fall, and in doing so reduce the risks to an acceptable level without treating any individual less favourably.

5.2 Monitoring, Audit and Review

We monitor health and safety by periodically checking working conditions and systems by:

- Carrying out regular Inspections and Audits on all site and premises
- Having managers / Leaders report on safety performance
- Investigating accidents and incidents and putting into place remedial actions to prevent similar incidents occurring in the future
- Looking for patterns of accidents, occurrences and absenteeism through work related ill health
- Auditing of safety management processes to ensure that all processes and procedures are working effectively

6. Arrangements for Implementing the Policy

6.1 Incident Reporting

How work-related Accidents, Dangerous Occurrences and Diseases are dealt with:

1. An Accident Book is kept by Reception.
2. Any accidents must be reported to Reception/H&S Manager **immediately**.
3. All accidents, near misses and dangerous occurrences (however minor) must be investigated at the earliest opportunity by the H&S Manager. All corrective or preventative measures will be actioned, to prevent reoccurrence.
4. All incidents, near misses etc. must be entered on the relevant forms supplied to all staff. Forms must be forwarded to the H&S Manager so they can be recorded.
5. Be aware of the procedures that must be followed regarding the types of reportable injury (death of any person, specified injuries to workers, over 7 day incapacitation of a worker, non-fatal accidents to non-worker (e.g. members of the public), certain occupational diseases, certain dangerous occurrences and certain gas incidents. All reportable incidents must be reported to the HSE. *See section below RIDDOR Reporting.*
6. If an employee or their doctor suspects that the work the employee carries out is the cause of their ill health, they must inform their supervisor or manager without delay.

See Incident Reporting Procedure Appendix 1.

Accident Investigation

All incidents will be investigated to establish the root cause, our investigation will:

- Be factual and without bias
- Clearly show the sequence of events leading to the accident or incident
- Identify immediate causes
- Identify underlying causes, for example unsafe conditions
- Show root cause, for example lack of supervision, training or monitoring

By discovering all causes, we will be able to learn from accidents and incidents and then aim to prevent re-occurrences.

RIDDOR Reporting

Introduction

Push Energy Ltd has a statutory responsibility as an employer to report specified incidents in accordance with the Health & Safety at work Act 1974 and the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

We aim to ensure all reportable cases of work related injuries, diseases and dangerous occurrences are reported to the Health & Safety Executive in the approved manner and within legally defined timescales.

Purpose

This Policy has been developed to enable Push Energy Ltd compliance to the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013

Reporting Requirements

Under RIDDOR you must report some work-related injuries, diseases and dangerous occurrences. This requirement covers all work activities but not all incidents.

The following are reportable if they arise out of or in connection with work: -

- The death of any person, with the exception of suicides, must be reported if they arise from a work-related accident, including an act of physical violence to a worker.
- Accidents to members of the public or others who are not at work must be reported if they result in an injury and the person is taken directly from the scene of the accident to hospital for treatment to the that injury.
No need to report incidents where people are taken to hospital purely as a precaution when no injury is apparent.
- Employers and self-employed people must report diagnoses of certain occupational diseases where these are likely to have been caused or made worse by their work.
- One of the 27 specified 'dangerous occurrences' - these do not necessarily result in injury but have the potential to do significant harm.

Over-seven-day incapacitation of a worker

Accidents must be reported where they result in an employee or self-employed person being away from work, or unable to perform their normal work duties, for more than seven consecutive days as the result of their injury. This seven day period does not include the day of the accident, but does include weekends and rest days. The report must be made within 15 days of the accident.

Non-fatal accidents to non-workers (e.g. members of the public)

Accidents to members of the public or others who are not at work must be reported if they result in an injury and the person is taken directly from the scene of the accident to hospital for treatment to that injury. Examinations and diagnostic tests do not constitute 'treatment' in such circumstances.

There is no need to report incidents where people are taken to hospital purely as a precaution when no injury is apparent.

Specified injuries to workers

The list of 'specified injuries' in RIDDOR 2013 replaces the previous list of 'major injuries' in RIDDOR 1995. Specified injuries are (regulation 4):

- fractures, other than to fingers, thumbs and toes
- amputations
- any injury likely to lead to permanent loss of sight or reduction in sight

- any crush injury to the head or torso causing damage to the brain or internal organs
- serious burns (including scalding) which:
 - covers more than 10% of the body
 - causes significant damage to the eyes, respiratory system or other vital organs
- any scalping requiring hospital treatment
- any loss of consciousness caused by head injury or asphyxia
- any other injury arising from working in an enclosed space which:
 - leads to hypothermia or heat-induced illness
 - requires resuscitation or admittance to hospital for more than 24 hours

Reportable dangerous occurrences:

Dangerous occurrences are certain, specified near-miss events. Not all such events require reporting. There are 27 categories of dangerous occurrences that are relevant to most workplaces, for example:

- collapse, overturning or failure of load-bearing parts of lifts and lifting equipment;
- plant or equipment coming into contact with overhead power lines;
- accidental release of any substance which could cause injury to any person

Occupational diseases

Employers and self-employed people must report diagnoses of certain occupational diseases, where these are likely to have been caused or made worse by their work: These diseases include (regulations 8 and 9):

- carpal tunnel syndrome;
- severe cramp of the hand or forearm;
- occupational dermatitis;
- hand-arm vibration syndrome;
- occupational asthma;
- tendonitis or tenosynovitis of the hand or forearm;
- any occupational cancer;
- any disease attributed to an occupational exposure to a biological agent.

Keeping records

The Company must keep a record of any reportable injury, disease or dangerous occurrence. This must include the date and method of reporting; the date, time and place of the event; personal details of those involved, and a brief description of the nature of the event or disease. The record must be kept for three years from the date the company records the details. The Office will keep a record of completed report forms.

6.2 Display Screen Equipment

It is the policy of the Company to comply with the Health and Safety (Display Screen Equipment) Regulations 1992 (as amended 2002). The Company will conduct health and safety assessments of all workstations staffed by employees who use DSE as part of their usual work and will ensure that all workstations meet the requirements set out in the Schedule to the Regulations.

DSE Users

The risks to users of DSE will be reduced to the lowest extent reasonably practicable. DSE users are encouraged to take periodic breaks in their work.

Eyesight tests will be provided for DSE users when required. The Company will arrange an eye test at an optician of their choosing and will contribute up to a maximum of £25 to the cost of the test. Where the eye test shows that the user needs glasses specifically for DSE work, the Company will contribute £25 to the cost of a basic pair of frames and lenses.

If you require an eyesight test, please inform your Line Manager and the Health and Safety Manager.

All DSE users will be given appropriate and adequate information/training on the health and safety aspects of this type of work and will be given further training and information whenever the organisation of the workstation is substantially modified. Where any person uses Display Screen Equipment at home for work purposes then the workstation involved should comply with the schedule as stated in the Health and Safety (Display Screen Equipment) Regulations 1992 (as amended in 2003).

DSE Assessment

Once a User has been identified they will be required to undertake a Self-Assessment that will be reviewed by a Competent Assessor. A detailed Self-Assessment Form will be kept as a record of the Users assessment of their work station.

The User's Line manager will be informed of any significant findings and any recommendations to reduce the risks to an acceptable level. The DSE Assessment will remain as live document and will be reviewed when;

- The User leaves the Company
- Significant changes to the workstation or environment takes place
- The User makes a formal complaint as to aches or pains in the upper limbs
- The User is either pregnant or suffers from an ailment or injury that may affect their safe working

6.3 Electrical Equipment (Portable, Transportable & Fixed)

All reasonable steps will be taken to secure the health and safety of employees who use, operate or maintain electrical equipment. The Company acknowledges that work on electrical installations and equipment is a fundamental part of the business operations such work can be hazardous and it is therefore the intention of the Company to reduce the risks as far as is possible. The implementation of this policy requires the co-operation of all members of management and staff, as well as any contractors hired to carry out work involving electrical equipment. Where a problem arises related to electricity at work, employees must inform a responsible person immediately and the Company will then take the necessary measures to investigate and remedy the situation. In the event of an incident/injury, the company accident/incident reporting process should be followed, see Appendix

1. The Company will, in consultation with its employees: -

- Ensure that electrical installations and equipment are installed in accordance with the IEE (Institute of Electrical Engineers) Wiring Regulations as amended, this extends to ensuring the testing of sub contracted works
- Maintain the fixed installation in a safe condition by carrying out routine safety testing
- Inspect and test portable and transportable electrical equipment as frequently as required
- Exchange safety information with contractors, ensuring that they are fully aware of (and prepared to abide by) the Company health and safety arrangements. As part of this process the Contractor HSE Vetting Questionnaire will ensure that all contractors are competent.
- Provide specified personal protective equipment as necessary, maintain it in a good condition and replace damaged or lost items as necessary
- Ensure that all tools and equipment are suitable and adequate for electrical working that is they are EN/BS approved
- Ensure that any employees who are required to work on any electrical systems are suitably competent to do so

Portable Appliance Testing (PAT)

The Health and Safety Manager is responsible for ensuring that all portable electrical appliances within the offices are maintained in a safe condition and inspected at suitable intervals.

The results of the inspections completed are to be recorded in the Portable Appliance Register. The portable appliance registers for the Company will be maintained and controlled by the Health and Safety Manager.

Suggested initial intervals

Offices and low-risk environments

Type of business/equipment	User checks	Formal visual inspection	Combined inspection and electrical tests
Battery operated (less than 20 volts)	No	No	No
Extra low voltage: (Less than 50 volts ac) e.g. telephone equipment, low voltage desk lights	No	No	No
Computers / photocopiers / fax machines	No	Yes 2-4 years	No if double insulated otherwise up to 5 years
Double insulated equipment: not hand-held. Moved occasionally, e.g. fans, table lamps, slide projectors	No	Yes 2-4 years	No
Double insulated equipment: Hand-held. E.g. some floor cleaners, some kitchen equipment and irons	Yes	Yes 6 months – 1 year	Yes 1-2 years
Earthed equipment (class 1): e.g. electric kettles, some floor cleaners, portable electric heaters	Yes	Yes 6 months – 1 year	
Cables (leads) and plug connected to above. Extension leads (mains voltage)	Yes	Yes 6 months-4 years depending on the type of equipment it is connected to	Yes 1-5 years depending on the type of equipment it is connected to.

All records of portable appliance testing are kept in the relevant folder in head office.

Premises must be inspected and tested every five years and certificated to ensure maintenance of electrical systems.

User Checks (visual)

Employees using the equipment are encouraged to look critically at the electrical equipment they use and visually check for signs that the equipment is not in sound condition, for example:

1. there is damage (apart from light scuffing) to the cable sheath;
2. the plug is damaged, for example the casing is cracking or the pins are bent;
3. there are inadequate joints, including taped joints in the cable;
4. the outer sheath of the cable is not effectively secured where it enters the plug or the equipment. Obvious evidence would be if the coloured insulation of the internal cable cores were showing;

5. the equipment has been subjected to conditions for which it is not suitable, e.g. it is wet or excessively contaminated;
6. there is damage to the external casing of the equipment or there are some loose parts or screws;
7. there is evidence of overheating (burn marks or discoloration).

These checks also apply to extension leads and associated plugs and sockets. The user should undertake checks when the equipment is taken into use and during use. Any faults should be reported to management and the equipment taken out of use immediately. Management should take effective steps to ensure that the equipment is not used again until repaired by a person competent to carry out the task, (e.g. the defective equipment could be labelled as 'faulty' and its associated plug removed).

6.4 Emergency Procedures

The purpose of having emergency procedures arrangements in place is to ensure an effective response in the event of serious or imminent danger such as fire, bomb alerts, flooding, major release of chemicals, major incidents and accidents.

A Fire Risk Assessment shall be carried out and recorded at all Company locations. An Emergency Information Form will be displayed on notice boards throughout the premises. All new personnel will be informed of the specific site arrangements at Induction.

Specific duties and responsibilities for first aid and fire wardens will be appointed. Fire extinguishers are located around the premises with an indication of the type of fire on which they should / should not be used. Arrangements are made for them to be inspected annually by an appropriately qualified engineer and certification of inspection will be maintained in file for audit purposes. A fire alarm is installed in the premises. Arrangements will be made for this to be tested weekly. A record of each test will be maintained for audit purposes.

If fitted, arrangements will be made for emergency lighting to be tested monthly by simulated mains failure, a record of each test will be maintained for audit purposes. Emergency lighting will be tested every six months by simulated mains failure and allowed to discharge for at least one hour. A record of each test will be maintained on file for audit purposes. Arrangements will be made for emergency lighting to be tested every year by simulated mains failure and allowed to discharge for at least three hours, a record of each test will be maintained for audit purposes. Arrangements will be made for emergency lighting battery packs to be changed every four years or such period as stipulated by the battery manufacture. A record of each battery change will be maintained on file for audit purposes.

Major Incidents / Bomb Alerts / Flooding / Major Release of Chemicals and Collapse of Structure:

If any of the above circumstances arise, please call the emergency services (999) as soon as possible.

What is a major incident?

A Major Incident is best described as an event that overwhelms the responder's ability to deal with it using its normal day to-day resources. It has been defined as an emergency that requires the implementation of special arrangements by one or more of the Emergency Services, the NHS or the Local Authority.

What Plans are in Place?

Turn off and disconnect any plant or equipment in operation, go immediately to the site assembly point. Do not run. Do not return to your workplace until instructed to do so.

Bomb Alerts

In the case of a bomb alert all personnel will leave the premises or site immediately, the police will then be called. No one will return until instructed to do so by the police.

Flooding

The Environment Agency is the lead agency on flooding issues. They have mapped flood risk areas on an electronic map on their web site, on which you can check all of your critical locations, and possibly your normal access or delivery routes.

You may also need to consider that flooding can be caused by burst pipes, water mains and sewers as well as natural sources.

Consider how this may impact on equipment, storage areas and car parks that may be in basements or low-lying areas. Find out what services (pipes, mains and sewers) are in the ground around your buildings.

Major Release of Chemicals

Follow Chemical Spillage procedures

Collapse of Structure

Building collapses are not uncommon, neither in the United Kingdom or worldwide. Buildings collapse for a variety of reasons. Natural phenomena such as earthquakes, hurricanes, floods, mudslides, avalanches, and storms are the usual cause for multi-building collapses. It must be understood that minor hazards become severe health risks after a structural collapse. For example, emergency lights become flesh-devouring acid pools, yet only appearing as wet spots on walls. The severe dust contains every disease that has been safely buried for the past few hundred years just waiting to find a nice warm moist home in your lungs. Water and sewage systems, electrical wires, and hazardous materials, among others, may pose danger.

When the area has been made safe, an accident investigation team will be formed to carry out a full investigation into the occurrence. The HSE must be informed of any structural collapse and they will require the scene preserved until they arrive on site.

6.5 Environmental Policy

Push Energy Ltd is committed to making sure that its activities are consistent with best practice within its industry and with relevant legislative and regulatory requirements, and fully accepts the need to protect the environment for the benefit of society and will make environmental considerations an integral part of its business activities.

The company's Environmental Policy will be reviewed regularly to make sure that it continues to meet or exceed current standards.

Our commitment means that all staff at every level of the company will strive to meet minimum standards, as set by the company from time to time, for:

- Recording the use of raw materials and other supplies
- Recording the safe and environmentally acceptable disposal of waste materials
- Finding new methods of waste disposal that are more environmentally acceptable than existing methods
- Reducing energy usage to a minimum level, where possible
- Advising customers on the company's environmental policy and the best practice that may have an impact on the environment.
- Assessing suppliers' compliance with the company's environmental policy
- Maintaining a 'good neighbour' approach to the local community and aim to support local environmental initiatives where possible

As part of this environmental policy, the company will appoint an employee or director to act as an environmental officer. They will be responsible for implementing this policy and for its effective communication to all staff, customers and suppliers.

Push Energy Ltd will:

- Set and review realistic targets to ensure that we are continually improving our environmental performance.
- Undertake our activities consistent with good environmental practice so as to prevent pollution.
- Maintain compliance with the relevant applicable environmental legislation.
- Communicate and consult with staff on environmental matters.
- Ensure that staff recognise that consideration of the environment is integral to its work activities and that each staff member has a personal responsibility to maintain high standards of environmental care.
- Carry out environmental impact assessments of work activities at the planning stage with aim of keeping resource consumption, waste and pollution to a minimum.
- Manage its estate, equipment and stock with environmental considerations in mind; and
- Seek to ensure that its suppliers, contractors, business partners and customers take their environmental responsibility seriously

Waste and the Duty of Care

The Duty of care is covered in Part 2 of the Environmental Protection Act 1990. The Duty of Care applies to anyone who produces or imports, keeps or stores, transports, treats or disposes of waste. It also applies if they act as a broker and arrange these things.

The Act defines the following:

Pollutants as

- Solid wastes discharging onto land
- Liquid wastes discharging onto land or into water
- Discharges onto the atmosphere
- Noise in the community

Controlled waste as:

- Waste from households
- Waste from industry
- Commercial waste

Special waste as:

- Controlled waste that is so hazardous that it can only be disposed of using special procedures.

The Company will take the following steps to keep waste safe:

- Stop waste escaping from our control and store it safely and securely. We will prevent it causing pollution or harming anyone.
- Keep it in a suitable container. Loose waste in a skip will be covered.
- We will describe the waste in writing. We will fill in and sign a transfer note for it and keep a copy.
- Ensure our waste carriers have a valid waste carriers licence in place and can transport, recycle or dispose of it safely.

Environmental Incident Response Procedure

An environmental incident is defined as the release either accidental or malicious, of a harmful substance, for example:

- Chemical or oil spillage
- Uncontrolled release of harmful substance to the atmosphere
- Uncontrolled release of harmful substance to the sewerage system
- Uncontrolled release of a harmful substance to a local watercourse
- Uncontrolled release of a harmful substance to land

Environmental Incidents will be responded to in accordance with Appendix 6.

Signed:

Date:

Name: Drummond Sydenham

Position: interim MD

6.6 Fire Safety

The Company shall take all necessary measures to ensure the safety of employees and other personnel on their premises, from all hazards relating to fire. The Company shall ensure that all routes are clearly marked, to enable egress from the premises to a place of safety.

Fire Safety Training

- All employees to attend site safety induction on-site, where applicable. Ensure induction covers site specific fire procedures (alarms, assembly point(s), test times, drills etc.)
- If ever carrying out hot works, a permit to work must be issued and adhered to.
- Fire marshals will have specific fire marshal training and be trained in the safe use of fire extinguishers.

Means of escape for the disabled or vulnerable individuals

The actions required to ensure the safe and effective evacuation of disabled people in an emergency situation, will be given detailed consideration. The fire management system will ensure that all employees of the Company, and other personnel who enter the premises, can escape in the event of a fire.

A Personal Emergency Evacuation Plan (PEEPS) will be required for all staff and visitors with mobility impairments, sight impairments, hearing impairments or cognitive impairments, who are therefore not able to evacuate the building unaided, or in a prompt manner.

Fire Evacuation

For further information on fire evacuation procedures please see *In the Event of a Fire -Tollgate - Appendix 2*

Fire Control Measures

The Company has a Fire Risk Assessment of their premises, these are reviewed periodically, in accordance with the Regulatory Reform (Fire Safety) Order 2005. The reviews are undertaken:

- Every year (Offices)
- Following significant changes to the operations or management, premises or current legislation

Fire Exits and Fire Doors

- Fire exits are provided as a route away from the premises in the event of an emergency, and shall be kept clear of obstruction at all times.
- Fire doors are designed to stop the spread of smoke and flames, and shall be kept closed at all times.

Fire Alarms and Fire Alarm Call Points

- Fire alarms shall be activated by breaking the glass at a Fire Alarm Call Point. All Fire Alarm Call Points shall be kept clear of obstructions at all times.

- The Company shall ensure that all employees and other personnel are familiar with the sound of the Fire Alarm, and the position of the Fire Alarm Call Points throughout the premises on escape routes.

Fire Extinguishers

- The Policy of the Company shall be that no employee or other personnel shall attack a fire unless they are trained to do so, other than if the fire is likely to block their means of escape or is likely to endanger their life.
- Each fire requires its own specific means of extinguishment, and the Company shall try to ensure that fires are not worsened by the improper use of extinguishing media.

To limit the effect of a fire on the Environment and the Local Community, the following Agencies must be contacted:

The Environmental Protection Officer – the Environmental Agency,
Telephone: 01473 727712
Anglian Water, Telephone: 01206 289302
Police, Telephone 01255 221312
Health and Safety Executive, Telephone 01245 706200

6.7 First Aid

Needs assessment

The Company will make an assessment of the first-aid needs to establish what provision for first aid is required. This will depend upon the workplace, taking into account, among other things, the number of employees, size, location and work activity. The needs assessment will be reviewed when deemed necessary, such as when new premises are used, or more employees join the company.

How first Aid cover at work is provided and ensured:

The Health and Safety (First-Aid) Regulations 1981 (as amended) requires employers to provide adequate and appropriate equipment, facilities and personnel to enable first aid to be given to employees if they are injured or become ill at work.

Employees should follow the procedures listed below:

- The First Aiders name will be displayed in the kitchen area at head office and other various locations around the premises. Onsite the First Aiders names will be displayed in the main porta cabin office on site.
- If an injury or illness occurs you should make immediate use of any first aid equipment and services available.
- Call an ambulance if the injury or illness is serious or if you have any doubt about the injured or ill person's condition.
- Do not put yourself in danger when trying to help any injured person.
- Any casualty should be made as comfortable as possible, kept warm and protected with coats, rugs etc.
- Unconscious casualties should be placed on their side in the recovery position.
- If there is serious bleeding apply direct pressure, if possible, to the wound and elevate the affected limb.

- Burns should be cooled with clean water, preferably under a running tap for at least ten minutes
- The Company policy is to only use First Aid Kits that meet the British Standard – BS-8599.
- First aid kits are to be in correctly marked boxes, being a white cross on a green background.
- Items such as patent medicines, aspirin, paracetamol, etc are not to be kept in first aid kits.
- Site Induction will inform employees and sub-contractors of the first aid arrangements for a site.
- In the case of very short duration work involving no more than two employees, a small travelling first aid kit will be provided on the Company's transport.

6.8 Hazardous Substances

Operational Guidelines for COSHH

All employees and sub-contractors must be familiar with completed assessments of substances hazardous to health and associated procedures. General rules for the safe use of substances include:

- Referring to the Push Health and Safety Manager, on all occasions when it is believed that unusual conditions apply to the use of hazardous substances.
- Through suitable training and instruction ensuring hazardous substances are not misused.
- Wearing appropriate masks when working with any substances which can emit hazardous fumes.
- Appropriate gloves must be worn when dealing with any adhesive or other similar chemical.
- Waste or unused substances will be disposed of carefully and in an environmentally manner.
- Encouragement of personal hygiene - washing hands thoroughly after working with any substance.

COSHH Assessments

Push Energy Line Managers have a responsibility to ensure assessments of all substances in use are undertaken, in order to identify and minimise associated health risks. Substances lists are reviewed where necessary and updated at each location where substances are stored. None of the substances in general use present an unacceptable risk to the health of any employee or subcontractor in the normal course of use; provided that the procedures set out in the assessment are followed. Various substances can present a risk in continuous use or in use under unusual conditions (ie confined spaces or areas with poor ventilation). All substances can present a risk when misused.

COSHH assessments are carried out for substances used / supplied by the Company and any safety data sheets. Copies are given to all employees and are to be carried in the vehicle, with reference to the substance to be used. The Company prohibit the use of any hazardous substance for which an assessment has not been completed, or data sheets not obtained.

See COSHH Risk Assessment Flowchart- Appendix 3

All approved substances are logged on the company COSHH register, if you come across a substance which is not logged on the register, the following action must be taken:

- Stop using the chemical immediately
- Report to your Manager
- Manager to take appropriate action and inform the Health and Safety Manager so that a COSHH assessment can be created, and necessary precautions taken.

Workplace Exposure Limits (WELs)

WELs are British occupational exposure limits and are set in order to help protect the health of workers. WELs are concentrations of hazardous substances in the air, averaged over a specified period of time, referred to as a time-weighted average (TWA). Two time periods are used: long-term (8 hours); and short-term (15 minutes).

Short-term exposure limits (STELs) are set to help prevent effects such as eye irritation, which may occur following exposure for a few minutes.

Substances that have been assigned a WEL are subject to the requirements of COSHH, and exposure limits will be included in the COSHH assessment for that substance. Push Energy will ensure any WEL is not exceeded and exposure to asthmagens, carcinogens and mutagens will be reduced as low as is reasonably practicable.

Further information on workplace exposure limits can be found in the HSE guidance document EH40/2005 Workplace Exposure Limits.

Operational Guidelines for Working with Asbestos

The Company office in Colchester was constructed in 2014, no asbestos was used within the construction and none currently present. However, the Company will ensure that suitable Asbestos Awareness Training takes place with respect to employees and subcontractors working on sites if the risk requires. In the absence of a refurbishment survey the general contingency procedure is:

- If any area or material is discovered or suspected to contain any Asbestos material, work will stop in that area.
- The area will be contained
- A Local Registered Asbestos Contractor will be contacted to ascertain the material discovered and the material will either be removed or suitably contained – depending on the condition.
- No work will continue within the affect area until formal written authority is given by the Client.

6.9 Workplace & Welfare

Push Energy Ltd will ensure that all its workplaces comply with the relevant Workplace Health, Safety and Welfare Regulations and other relevant regulations applying to the work place. To remain compliant with legislation the Company will ensure the following:

- Workplace equipment, devices and systems will be maintained as per the manufacturer's recommendations.
- Adequate ventilation will be provided either by means of opening windows or by mechanical means.
- Temperature will be kept to acceptable levels (In building, normally at least 16°C or 13°C where severe physical effort is required).
- There will be suitable and sufficient lighting for area and task.
- There will be adequate cleaning of furniture, furnishings, fittings, window, floors, and ceilings. Rubbish bins will be emptied regularly, (usually daily).
- There will be sufficient space for circulation and task
- Workstations and seating arrangements will be suitable for the persons using that workstation and the work being carried out.
- Floors will be suitable for the purpose for which they are being used and not cause a slip, trip or fall hazard.
- Employees will be protected from falling and falling objects whilst in the workplace.

- All windows and transparent/translucent doors, gates or walls will, where necessary, be made of safety materials and marked to make them apparent.
- Traffic and circulation routes shall be designed to ensure safety where practicable
- Washing facilities shall be provided and maintained in a clean condition and in adequate numbers for all staff. Barrier creams and hand cleaning gels are provided.
- All workplaces shall have access to drinking water and cups.
- Where appropriate for the work activity there will be accommodation for clothing and facilities for changing.
- Every manned work site will have facilities for rest; and preparation and eating of meals.
- All workplaces where there is a significant risk of high noise levels, will be assessed and control measures put in place as necessary
- Where reasonable we will adapt the premises and facilities to those employees with disabilities.
- Periodic inspections and audits will be carried out to ensure compliance with the above requirements as detailed in the audit and inspection procedure which is available as a separate document.
- All harmful substances to be placed in one area and clearly marked.
- When working on site, staff are supplied with adequate welfare facilities by the Main Contractor.

If you experience any problems in these areas, advice is available from the Health and Safety Manager, but you should first contact your line manager.

Workplace Inspections

Inspections of the workplace (Site, Office or Workshops) must be carried out on a regular basis, to ensure that the Health and Safety Policy Arrangements and safety guides are being complied with. The arrangements for the inspections are as follows:

The Health and Safety Manager will carry out random inspections of the workplace which will be recorded so that any required actions can be implemented.

6.10 Housekeeping Arrangements

Clean, tidy and uncluttered workplaces reduce the risk of injury to anyone working or visiting the premises. The following examples will ensure that good housekeeping is maintained at all times in the work environment:

- Keep floors, corridors and stairs clear of goods, obstructions and trailing leads at all times.
- Waste paper and litter must be placed in bins and all rubbish cleared away regularly.
- Broken glass or other sharp objects must be disposed of carefully and never left exposed in wastepaper bins.
- Spilt liquids must be cleared up immediately.
- Vision panels in doors must never be obscured.
- Never overload top drawers of filing cabinets or open more than one drawer at a time as this may cause the cabinet to tip over.
- Drawers of filing cabinets or desks should never be left open as this creates a tripping hazard.
- Ensure that there are no trailing leads from computers, telephones etc. that could be tripped on.

- Broken or unsafe furniture must be immediately taken out of use or effectively repaired.
- Use steps or kick stools to gain access to high shelves, never climb on boxes or chairs.
- Any potentially insecure furniture (e.g. Vertical plan chests) should be fixed to a solid structure or back-to-back for stability.

If you see a potential hazard, correct it if you can do so safely. If not, put the hazard out of action or prevent access to the area. Then tell your supervisor or the Health and Safety Manager so that it can be recorded.

6.11 Home Working

Some of the company's employees may be working from their homes.

The Health & Safety Work Act 1974 and most Regulations apply equally if you are working at home as they would at your employer's work place. Examples of relevant legislation would include Display Screen Equipment, Provision and Use of Work Equipment, Manual Handling and Control of Substances Hazardous to Health. These must all be complied with including the requirements for Risk Assessment.

If you work from or at your home the company is responsible for maintenance and inspection of any equipment provided. In particular electrical equipment including computers etc. must be inspected / tested at the specified intervals.

Any accidents whilst working at home must be reported in the same way as if you were at the company's work place.

If you need further advice contact your manager or the Health & Safety Manager.

6.12 Information, Instruction, Training & Competency

Health & safety updates/changes in Legislation are regularly monitored by the Health and Safety Manager.

All new employees will receive an initial induction to cover statutory requirements. Health & Safety induction is compulsory and all new starter, relocated, temporary and promoted staff will go through an induction training programme.

Employees will undergo training, which their manager's feel is necessary and appropriate for them to carry out their work safely.

All safety training will be recorded in the staff safety-training folder.

Training Policy

Push Energy Ltd places training firmly to the forefront of its Company Policy. By constantly reviewing the Training Policy and encouraging on-going training, Push Energy Ltd is able to lay down the foundations for the long-term benefit to the individual and the company, by ensuring that Managers and Staff alike receive the necessary training to carry out their day-to-day duties effectively.

The mission statement from the MD is that every employee will receive the necessary training in order to enable them to progress to their full potential.

On joining Push Energy Ltd, where appropriate, every employee will receive:

Induction / Training
Manual Handling Training
Job Specific Training

6.13 Lone Working

Managers must ensure that no employee, contractor or visitor is permitted to work alone if there is any significant risk to their health or safety whilst doing so. If there is a significant risk, a formal written risk assessment must be undertaken.

All employees must use their judgment to assess if the work they are doing whilst alone puts them at risk and to cease work and report to their supervisor or manager if they consider themselves at risk. No person under 18 years is permitted to work in isolation.

Adequate arrangements must be made for maintaining contact by radio, telephone or in some other way, with, or between, employees who are working on their own.

Prohibited practices outside visual contact are:

- Use of electrical test apparatus (PATs)
- Loading or unloading ride-on plant
- Working in confined space

- Using unsecured portable ladders, steps or trestles.
- Work immediately adjacent to deep unguarded or fast flowing water
- Work requiring safety harness, lifeline or fall protection
- Electrical work as defined in the company's safety rules
- Lifting heavy loads
- Excavating near known underground services
- Using jetting machines operating above 35 bar pressure
- Entering a site where it is believed intruders may be present
- Using a chainsaw
- Working from hydraulic/motorised access platform
- Any operation defined by formal risk assessment prohibiting lone working.

A second person should be present to give emergency assistance while these tasks are undertaken.

The Company has put procedures in place to monitor lone workers to see they remain safe. These include: -

- Supervisors periodically visiting and observing people alone
- Regular contact between the lone worker and supervision by using a telephone
- Checks that a lone worker has returned to their base or home on completion of a task.

6.14 Manual Handling

Operational Guidelines for Manual Handling

Upper Limb Disorders (ULDs) and other injuries associated with manual handling are one of the largest causes of lost work time. To minimise the risk of injury the Company undertakes assessments of manual handling operations; such assessments will identify means of eliminating or reducing the risk of injury. Line Managers will identify any special manual handling operations and will arrange for a manual handling assessment to be undertaken.

It is the Company's policy to ensure a safe working environment and therefore will not assign particular manual handling tasks to pregnant women, or other persons who do not have the individual capability or relevant experience. All employees and Sub-Contractors will be encouraged:

- Familiarise themselves with completed manual handling assessments and follow the procedures established by them.
- Report any manual handling operation which has not been suitably assessed by the Company.
- Report any health problems or other factors which may affect his/her capability to perform manual handling operations.
- Report any manual handling task he/she is asked to do, which he/she believes to be beyond his/her capabilities.

All staff will receive manual handling when starting employment with the Company.

See flowchart Manual Handling Risk Assessment- Appendix 4

6.15 Motor Vehicle Safety

It is the intention of the Company and in line with the Company Environmental Policies to promote the use of environmentally friendly practices and utilise Company vehicles that reduce the burden of greenhouse gases, this will be achieved by the utilisation of smaller compact vehicles that produce lower amounts of CO2 emissions and are economical to run.

The Company requires all employees that use motor vehicles on Company business to:

- Ensure his/her vehicle is roadworthy and in receipt of a valid MOT Certificate.
- Ensure the vehicle is insured to include Business Use.
- Ensure that they are not banned from driving for medical reasons or by court judgment.
- Undertake a routine check of the vehicle before commencing a long journey to include:
 - Tyres including the spare tyre
 - Oil & Water

Further details are available on daily vehicle checks in the *Daily Vehicle Walkaround Checklist* document.

- No chemicals or waste materials are carried unless they hold the correct license.
- Where possible, no more than a maximum of 2hrs constant driving without a 15-minute break.
- Valuables must be kept out of site when the vehicle is not occupied.

Mobile Phone Use

From March 2017, the penalty for using a mobile phone whilst driving changed to a fixed £200 fine, plus six penalty points on your driving license. You are reminded that any fine or penalty incurred whilst driving a work vehicle will be the responsibility of the driver.

All company vehicle drivers will be issued with a hands-free kit for them to use whilst driving on company business. All employees will be reminded that outgoing calls should only be made when it is absolutely necessary and where it is possible, they should restrict outgoing calls to emergencies only. When incoming calls are received, the driver should inform the person making the call that they are driving, and if the call can wait then they should call back later when they are no longer driving.

6.16 Work Equipment

Operational Guidelines for Selection, Maintenance & Use of Work Equipment

The Provision and Use of Work Equipment Regulations 1998 (PUWER 98) specify the requirements for the design, manufacture, modification, purchase, supply and use of all work equipment. The Company has implemented the following guidelines with respect to the current regulations:

Selection

- All equipment purchased will be suitable for its intended operational use.
- Where applicable, equipment will be provided that meets the requirements of British Standards and any International Standard or relevant legislation.
- All work equipment purchased must be assessed risk prior to purchase and before issued for use.
- Suitable and sufficient risk assessments must accompany the purchase request to demonstrate this element has been considered
- Risk Assessment must detail the training/instruction elements where offered by the supplier
- Ensure all work equipment, components or any articles or substances that are at high or very low temperatures are protected so as to prevent burn, scald or sear injuries through contact with the offending surface.
- Ensuring that work equipment is provided with a clearly identifiable and readily accessible means of isolating it from its energy source, where appropriate.
- Special training needs will also be considered where applicable; as will regard for the working conditions and possible hazards in which the equipment will be used.
- Cost and complexity of the training must support the risk assessment with the purchase request
- Ensure all work equipment has appropriate and clearly visible health and safety markings, where required and that any appropriate health and safety warning or warning devices are incorporated. Such warnings will be unambiguous and easily perceived and understood
- Local Exhaust Ventilation (LEV), although Push Energy have not identified a requirement for LEV, the aspect of suitable LEV on work equipment will be considered at the point of risk assessment prior to purchase. Where required the necessary manufacturer's instructions will be adhered to for maintenance and use.

Use (where required this extends to Company owned and Leased work equipment)

- Only Push Energy employees that have been trained and/or have sufficient knowledge and experience in the use of the work equipment must be allowed to use the equipment
- Where required Push Energy require employees to demonstrate they are Competent to operate or use work equipment. This is achieved by supplying certification to operate or demonstrating long term experience, where Statutory Requirements dictate, up to date certification will over rule experience.
- Training records and confirmation of experience of employees will be held by the Health and Safety Manager and/or HR. Training records and confirmation of experience of regularly employed Contractors and Sub-Contractors will be held by the Delivery Department.
- Mobile work equipment SHALL NOT be used to carry people unless it is suitable for that purpose (with a seat and seatbelt) and incorporates measures to reduce any risks to safety (including risks from wheels or tracks), as low as is reasonably practicable.

- NB: Push Energy will take disciplinary action (Red Card) against any employee, contractor or sub-contractor that carries or allows to carry passengers on any mobile work equipment that is not designed specifically for purpose. This rule is emphasised at site and company induction.
- Daily checks of all mobile plant will be undertaken by the operators prior to use
- Lifting Operations, the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) apply to ALL work activities and place duties on those in control of operations.
- All Lifting Equipment and Lifting Operations owned by the Company will be regularly inspected by the Company insurers and details recorded by the Health and Safety Manager in accordance with the above regulations. The Health and Safety Manager will ensure that all defects are recorded on the item and the equipment taken out of use before arranging ensure prompt remedial action. Written confirmation of remedial actions taken will be logged.
- Items without a valid test should be removed form service, locked away until a suitable record of test has been obtained.
- Work Equipment owned by the Company is not allowed to be used by any Contractor employed directly or in directly by the Company, without express formal permission.

Leased or Hired Work Equipment

It is the responsibility of all staff to ensure that any Work Equipment which is leased or hired on behalf of the Company is only undertaken via a reputable vendor, and correct test and maintenance certification is supplied.

Where training or instruction is required; the Health and Safety Manager will ensure that adequate numbers of employees or contractors are present, to ensure the Work Equipment is never used without trained personnel available. No employees, contractor or sub-contractors will be allowed to operate any leased or hired work equipment unless they are competent to operate it.

Employees, contractors and sub-contractor will not misuse any Work Equipment leased or hired on behalf of the Company. Daily checks must be undertaken in accordance with the Lease/Manufacturer's instructions. Any infringement of a Safe System of Work will be deemed as a breach of terms of conditions and be treated as a serious offence.

6.17 Risk Assessment

The Management of Health and Safety at Work Regulations 1999 places a duty on the Employer to undertake Suitable and Sufficient Risk Assessment of all Hazards within the workplace and associated operations to eliminate or reduce risks to an acceptable level. The Company will therefore take all reasonable steps to eliminate or reduce the risks to an acceptable level and ensure that risk assessments are carried out. Any employee who discovers a hazard during working operations will report the hazard to their Line Manager or the Health and Safety Manager so that the necessary remedial action can be taken.

Work Place Activities

It is the Managements responsibility to ensure that adequate risk assessments have been undertaken with respect to hazards identified within the workplace in accordance with the relevant statutory requirements.

Method Statement

A Method Statement will be produced for all works undertaken, the Method Statement will detail the works to be carried out and identify the following:

- Where, When and What works will be undertaken

- Who will be undertaking the works and what work equipment will be used
- Details of the Hazards and Associated Risks, reference to Risk Assessments
- What Control Measures will be implemented & how they are maintained
- Details of variations and communications
- Details of Emergency Procedures & Contact Numbers

See Risk Assessment Flowchart- Appendix 5

6.18 Expectant and Nursing Mothers

If you are pregnant you are advised to consult with your doctor and your Line Manager/Health and Safety Manager, to ensure that your work will not put you or your baby at risk.

A healthy pregnant woman can generally undertake normal duties. Nevertheless, pregnancy places extra strain on working women and steps must be taken to safeguard the unborn child (foetus).

A risk assessment of your job will be carried out by the Health and Safety Manager, this includes a risk assessment for manual handling.

Working conditions that require changes must be discussed with your line manager and Health & Safety Manager. Your doctor will be informed of any changes if appropriate.

You are advised to ensure that your immunity against Rubella has been confirmed.

6.19 Young People and Disabled Persons at Work

DEFINITIONS

A young person (16 - 18 years of age) is defined as any person who has not attained the age of 18 years (*The Management of Health & Safety at Work Regulations 1999*)

A child (under 16 years of age) is defined as someone who has not yet attained school leaving age (*The Education Act, 1996 (England and Wales)*)

Where young persons and/or disabled persons are employed by the Company all relevant risk assessments will be reviewed to ensure that all control measures implemented are suitable and relate to the disability of which employee is affected by. All placements will be planned and assessed accordingly.

Risk Assessment

The Company has an obligation to undertake risk assessments of the particular risks to young people and disabled persons. These risk assessments will be made available to all relevant parties.

Young Person and Disable Person Management

The Line Manager directly responsible for an employed young person and must ensure that the young person is authorised only to undertake tasks once a related risk assessment has been completed; this must make particular reference to the risks to young people, and the requirement for the young person to received appropriate training and information.

Details of the disabilities of the disabled person must be made available to the Line Manager to allow a true assessment of proposed tasks to be undertaken, which will allow the correct control measure to be implemented

In undertaking such assessments for young people and disabled persons, the following areas should be addressed:

- The inexperience or immaturity of Young People.
- The lack of awareness of risks to Health and Safety.
- Unfamiliarity of workplace and work equipment
- The layout of the work area.
- The nature of equipment and processes.
- The nature, degree and duration of exposure to chemical or physical agents.
- The nature and risk levels for manual handling tasks.
- Changes to emergency procedures
- The nature and extent of any training that should be provided.

The Company will not permit young people to work on any tasks where a high degree of risk has been identified or undertake any night shift work activities.

6.20 Safety of Visitors

The safety of all visitors to the Push Energy offices and sites is of high importance; therefore, the following will be implemented:

- We must be aware that visitors are on our premises.
- All visitors, either customers or company representatives, must report to the reception or site office, where they must sign in, and out when leaving.
- Hazards, controls, emergency procedures and visitor's rules will be explained to our visitors on arrival.
- Whenever possible, visitors will be accompanied by a company employee. Visitors will not be allowed to wander freely around work areas.
- Reasonable arrangements will be made to protect the safety of 'uninvited' visitors, especially children.
- All visitors must comply with the following conditions.
 - Follow any relevant emergency procedures for the premises (e.g. fire evacuation)
 - Adhere to no smoking controls
 - Park vehicles in such a way as not to obstruct fire escape routes or traffic routes
 - Either be accompanied or authorised to enter premises
 - Remain within authorised areas and not enter restricted areas unless accompanied
 - Not take anything from the premises without permission
 - Report all accidents and incidents and/or injury to the host
 - Wear all necessary personal protective equipment, which will be supplied, when necessary.

6.21 Personal Protective Equipment (PPE)

Personal Protective Equipment (PPE) is generally considered to be a measure of last resort; only to be used when other risk minimisation techniques are not appropriate, or to reduce residual risk. When use of PPE is unavoidable the Company will undertake a risk assessment and provide suitable PPE to all employees ensuring:

- It is appropriate to the risks involved
- Compliance with necessary standards (CE marked as a minimum);
- It fits the wearer and does not create additional risks.
- That if two or more items of PPE worn simultaneously are compatible.
- It is maintained in proper working order.
- Provision of suitable storage for PPE when not in use.
- Suitable cleaning and hygiene procedures if PPE is shared.
- Provision information and training to employees concerning the risks involved and purpose of PPE
- That all PPE is properly used
- Provision of all PPE is free of charge

Responsibilities

- All Departmental Managers and Leaders shall instruct employees trained to use PPE on its limitations, and how to inspect, fit, clean and store the equipment.
- Any PPE that is lost or damaged shall be reported to the Health and Safety Manager or Line Manager as soon as possible.
- All staff are under a legal obligation as per the Health & Safety at Work Act 1974 and PPE Regulations 1992 to wear all PPE provided that is relevant to the work activity being carried out.
- PPE register will be kept ensuring items are monitored regularly and all employees have been issued with the necessary PPE to carry out their job safely. Each new starter to the company will be issued with a PPE kit during their induction.

Respiratory Equipment

All dust and fumes are a risk to health. When it is not possible to reduce the risk of source, respiratory equipment must be worn. The equipment mentioned is available as:

- Disposable face masks
- Half and full mask respirators

If there is any doubt by the user of the substance or material being used, a superior should be consulted.

As an employer, we have a legal responsibility to control substances hazardous to health in your workplace, and to prevent and adequately control employees' exposure to those substances. Therefore, the provision of RPE may be necessary as part of our control regime.

The Health and Safety at Work etc Act 1974 and the Management of Health and Safety at Work Regulations 1999 requires us to provide and maintain a safe working environment, so far as is reasonably practicable. They set out the basic requirements for us to follow.

In addition to COSHH Regulations 2002, RPE may need to be used to satisfy requirements in the following pieces of legislation. We will need to consider whether any of these Regulations apply to us and comply with any specific requirements they contain on RPE:

- Control of Asbestos Regulations 2012
- Control of Lead at Work Regulations 2002
- Ionising Radiations Regulations 1999
- Confined Spaces Regulations 1997

Tight-fitting facepieces require each wearer to undergo a fit test. If the RPE does not fit, it will not protect the wearer. Face fit testing is a method of checking that a tight-fitting facepiece matches the wearer's facial features and seals adequately to their face. It will also help to identify unsuitable facepieces that should not be used.

6.22 Occupational Health

Occupational Disease

- The prevention of illness owing to work is the aim of the Company.
- Some work does involve exposure to hazardous substances and materials for which suitable control measures must be put in place.
- If you suspect your health may be affected or you have been accidentally exposed to a hazardous substance such as asbestos you must immediately contact your Manager who will support any emergency treatment already in hand or refer you for medical advice if necessary.
- If your doctor diagnoses an illness which he / she says may be associated with your work it must be reported to your manager and the Company Health and Safety Manager, Elizabeth Aldous.
- Some examples are
 - Dermatitis: any skin complaint or rash
 - Asthma type symptoms at home or work
 - Recurring headaches
 - Joint, muscle or tendon pain
 - Stress symptoms
 - Leptospirosis
 - Hepatitis A
 - Persistent infections
- Early recognition of problems and subsequent adaptation of work processes and working environments will prevent serious ill health effects developing.
- Advice on vaccination can be obtained from your local Health Nurse.
- Managers should liaise with Health Nurse's and implement an appropriate OH surveillance programme within their area of influence if necessary.
- Stress and stress related illness is a problem in today's workplace. If you think you have a stress problem your manager is available for advice. On returning to work after an absence owing to stress or stress related illness you must discuss your future work activities with your Manager. *(See Company Stress Policy in the next section)*

6.23 Work–Related Stress

Work–related stress can lead to ill health and can seriously affect the quality of life of our workforce. Legislation requires the Company to tackle work related stress and having a positive, satisfied, and psychologically healthy workforce will produce economic benefits for our organisation. Because of improved attendances, motivation and commitment, managing and securing the well-being of our workforce is an investment.

Responsibilities for Preventing and Managing Stress

Corporate:

The Company will take account of the risk of stress related ill health when meeting our legal obligations under Regulation 3 of the Management of Health and Safety at Work Regulations 1999 and be especially aware of any staff who may be more vulnerable, for example those returning to work after stress related illness, or those who have a domestic crisis, such as a bereavement. Work–related stress and health issues will be treated seriously, and the Company will respond positively to any concerns.

Employees are actively discouraged from working excessively long hours and encouraged not to take work home. Employees will be consulted and, where possible, able to participate in discussions that may affect them. Staff will be supported emotionally and practically.

Managerial:

Management will discuss with staff the subject of work–related stress and explain that the management have to identify if there is a problem within our Company.

The Company will provide support and training, according to the individual. Management must ensure there is good, open communication between employees and between employees and management.

Relevant Legislation:

HASAWA 1974

MHSW Regulations 1999

Employment Rights Act 1996

Working Time Regulations 1998

Disability Discrimination Act 1995

Protection from Harassment Act 1997

SRSC Regulations 1977

HS (Consultation with Employees) Regulations 1996

6.24 Drugs and Alcohol

Through our stringent vetting and probationary procedures, evidence of past or current alcohol or drug abuse will become apparent. Should any prospective employee declare past Alcohol or Drug abuse, the success of their application will be at the discretion of the MD. However, should previous or current abuse not be declared and subsequently come to light, Push Energy maintain the right to deal with the individual within their own disciplinary procedures.

This disciplinary procedure prohibits the consumption of alcohol and the entering of licensed premises both whilst on duty and immediately prior to duty, contravention of which is likely to result in dismissal or gross misconduct. This disciplinary procedure prohibits any person arriving at work and behaving in an intoxicating manner.

The taking of any banned and classified use of dangerous drugs is also subject to gross misconduct. It may well be in the prospective candidates' interest to inform the managers if they are taking prescribed medication.

Drugs and Alcohol Procedure

Drugs or alcohol render the employee unfit to continue duty and may be an important factor in accident causation, and if deemed necessary during an incident investigation testing will be carried out. Disciplinary action will be taken against any employee or subcontractor found to be under the influence of drugs / alcohol, this may also lead to dismissal.

Note: Drugs mentioned within this document relate to any of the drugs detailed in the UK Misuse of Drugs Act 1971.

But any person using prescribed drugs for medical reason should:

- Find out what the side effects may be i.e. dizziness, tiredness
- Inform their team leaders / supervisor that they are taking prescribed medications, the team leader will decide whether or not they will be able to start / continue work.

Push Energy will keep records of all personnel who have been screened for a minimum period of three years. We will monitor the results of such screening to identify any trends in alcohol/drugs abuse. We will regularly review this procedure and make any changes to control measures as necessary to eliminate or reduce risks resulting from any deficiencies found.

Things you shouldn't do

- Don't drink alcohol during meal breaks or during paid 'on call' duty.
- Don't wear your company branded clothing in licensed premises.

Things to remember

- Never have the smell of alcohol on your breath while you're at work.
- Don't get involved in an unexpected call-out if you have any doubts about your alcohol level or your fitness for general duties.

6.25 Health Surveillance and Personal Hygiene

How Health Surveillance (where necessary) is provided:

Health surveillance enables the identification of those employees most at risk from occupational ill-health.

Health surveillance detects the start of an ill-health problem and collects data on ill-health occurrences. It also gives an indication of the effectiveness of the control procedures.

It is required when there appears to be a reasonable chance that ill-health effects are occurring in a particular work place as a result of reviewing sickness records or when a substance listed in Schedule 6 under Regulation 11 of the COSHH Regulations is being used. Schedule 6 lists the substances and the processes in which they are used. The Company does not use any of the listed substances, however, the Company issues all staff with an eight page annual Health Surveillance questionnaire when they begin employment, covering such areas as manual handling, dermatitis, breathing, hand arm vibration etc.

Personal hygiene is very important for workers exposed to hazardous substances. Always wash hands thoroughly before eating drinking or smoking. Protection against biological hazards can be increased significantly by vaccination (e.g. tetanus). Finally, contaminated clothing and overalls need to be removed and cleaned on a regular basis.

HIV and Other Blood Borne Diseases

We recognise that some of our employees may be concerned about HIV and other blood borne diseases, such as hepatitis B, in our workplace. Although our workplace is low risk, and there is no significant risk of contracting blood borne diseases in every day work situations, all staff should follow these procedures:

- Keep all wounds covered
- If there is a spillage of blood, do not touch the blood. Contact a First Aider, as they have been trained in how to clean up such spillages safely
- Injuries must only be treated by a qualified first-aider

There is a significant risk to first-aiders who treat injuries without using appropriate equipment. We will train all first-aiders in how to protect themselves against blood borne diseases and will provide them with well-maintained protective equipment. All first-aiders should keep disposable protective gloves and a protective resuscitation aid at hand at all times.

Employees suffering from HIV

Employees suffering from HIV are to be encouraged to report their condition to the employer. Employees found to be suffering from HIV infection or AIDS will not be communicated to other employees without the sufferer's consent.

Hygiene

- Managers must ensure that all employees and contractors are made aware of this information and are able to apply it to their aspects of work.
- The aim is to ensure the wellbeing of employees by preventing infection of wounds, or illness contracted in the course of the employee's duties.
- Reporting and recording work-related illness, injury, cuts or grazes are essential for monitoring the health effects of work.
- The issue and use of protective clothing is mandatory for certain tasks.
- Contaminated overalls must not be taken home for cleaning or any other reason.
- Managers must ensure that adequate welfare facilities, cleaning of premises and mess room, hot water units and first aid materials are provided.

- Employees must be instructed on what to do in the event of accidental contamination and advised on immunisation, leptospirosis and other pathological micro-organisms.

7. Appendices

Incident Reporting Procedure- Appendix 1.

In the Event of a Fire -Tollgate -Appendix 2

COSHH Risk Assessment Flowchart- Appendix 3

Manual Handling Risk Assessment Flowchart- Appendix 4

Risk Assessment Flowchart- Appendix 5

Environmental Incident Response and Reporting Procedure- Appendix 6