

COMPANY HEALTH AND SAFETY POLICY

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Signed:



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This document makes reference to a Contacts Sheet which is available via the PETA Intranet. This list contains details of key contacts covering a range of areas, including health and safety.

Section I Policy and Planning

General Requirements (4.1)

An Occupational Health and Safety Management System (hereafter referred to as OHSMS) has been established in order to comply with the requirements set out in OHSAS 18001 and to ensure that the commitment exists at all levels within PETA Ltd to the prevention of ill health and injury..

OHSMS Policy (4.2)

It is the policy of PETA Ltd to:

- ▲ Promote and protect the health and safety of all employees whilst at work and the health and safety of others, e.g. safeguarding young and vulnerable learners, visitors and contractors, who may be affected by the activities of PETA Ltd.
- ▲ Comply with the requirements of the Health and Safety at Work Act 1974. The Management of Health and Safety at Work Regulations 1999 and all related safety legislation that may apply to the Company and its employees.
- ▲ To set objectives which will develop the OHSMS and provide a framework for continual improvement.

Implementation

To secure the health and safety of staff and other persons, in so far as is reasonably practicable, PETA Ltd will implement and maintain a Health and Safety Management System that complies with OHSAS 18001:2007 and interfaces with the company's ISO 9001 system, forming part of the Integrated Management System. The system is based on effective planning and evaluation and promoting a philosophy of continual improvement.

This will be achieved by:

1. Making suitable assessment of:
 - ▲ The health and safety risks to which Company employees may be exposed whilst at work.
 - ▲ The health and safety risks of persons not employed by the Company but who could be put at risk whilst on Company premises.
2. Providing and maintaining safe and healthy working conditions, taking into account any statutory provisions, in order to promote an accident prevention policy.
3. Informing all employees of Safety Regulations and Working Instructions applicable to them.
4. Providing training and instruction to enable employees to perform their work safely and efficiently and to meet their own particular obligations under this policy.
5. Making available and supervising the use of all necessary safety devices and protective equipment.
6. Monitoring safety performance with regard to this policy.
7. Actively utilise the IMS Advice Note system to monitor, improve and reduce health and safety issues.

All employees are required to:

8. Inform their Line Manager of any work situation, which they consider, represents a health and safety hazard.
9. Co-operate and support the management of the organisation on all matters relating to occupational health and safety.

10. Ensure the health and safety of themselves and colleagues, correcting where deemed within their ability and level of authority health and safety issues.

Planning (4.3)

PETA Ltd is committed to an effective health and safety planning structure, this includes:

- ▲ Ensuring the policy requirements are effectively implemented.
- ▲ The organisational structure defines the responsibilities, authorities and reporting structure.
- ▲ The requirements of the health and safety management system are effectively implemented.
- ▲ New and used equipment will be visually inspected, plant and machinery will be formally assessed prior to commissioning.
- ▲ Safe systems of work are implemented as a result of recommendations from the risk assessment programme and include training, supervision and the awareness of applicable legislation relevant to an individual's activities, emphasising the importance of compliance and the consequences if deviated from.
- ▲ Health and safety is monitored and recorded.
- ▲ All aspects of the system are subject to periodic audit.
- ▲ Reviews at top management level take place in order to assess the continuing effectiveness of the system.

Hazard Identification, Risk Assessment and Determining Controls (4.3.1)

Working Instructions are available that determine the methods employed for assessing the hazards and risks resulting from routine and non routine activities including substances hazardous to health, manual and mechanical handling, the use of display screen equipment and the introduction of new processes. These procedures ensure that the risks are clearly identified, who or what might be affected by the resultant risk, the current controls that are in place and the determination of any new controls that may need to be implemented in order to reduce risk.

This information is documented and maintained in a manner that is easily retrievable and is reviewed when setting objectives for occupational health, safety and welfare.

Legal and Other Requirements (4.3.2)

The IMS Consultant and Health and Safety Management Representative are responsible for identifying applicable legislation and other requirements relevant to the hazard identification and risk assessment programme within PETA Ltd. The applicable legislation for each site will be published on the intranet and will be subject to a legal compliance audit as part of the Site Safety Inspections/Audits.

Objectives and Programme (4.3.3)

In line with the Company's commitment to setting objectives for the Integrated Management System the management, within PETA Ltd, will also set objectives for occupational health and safety. These objectives will be documented in the Company Business Plan and will be consistent with the outcomes of the risk assessment programmes, legal and other requirements relevant to the Company's activities.

The occupational health, safety and management programmes will be consistent with the format used for documenting and monitoring the IMS objectives.

Section 2 Implementation and Operation (4.4)

Responsibility and Authority for Managing the OHSMS (4.4.1)

Structure and Responsibilities

Health and Safety Management Representative (Company Safety Manager)

The Health and Safety Management Representative has overall responsibility for ensuring that the Company's Health and Safety Policy and its accompanying OHSMS is effectively implemented and regularly audited at all sites.

Site Managers

Site Managers are responsible for the site health and safety and facilities management of their designated work places. This encompasses the effective implementation of the Company's Health and Safety Policy and procedures and compliance with legislative related matters applicable to their area. Duties and responsibilities include but are not limited to:

- ▲ Maintenance and updating of the site health and safety documents
- ▲ Ensuring all risk assessment and control activities are undertaken and implemented in a timely manner
- ▲ Compliance with Workplace (Health, Safety and Welfare) Regulations
- ▲ Controlling contractors working on site
- ▲ Ensuring waste from each site is managed correctly
- ▲ Co-ordinating facilities management for their site and ensuring routine maintenance requirements for repairs are undertaken

Health and Safety Officers

Nominated Officers are appointed from staff employed to undertake a health and safety related role within the company and have a responsibility to support Site Managers on all matters relating to health and safety legal compliance, resolving issues that might arise from audits, incidents or IMS advice notes and providing advice and guidance on participation, communication and staff development.

Each site will have a dedicated Health and Safety Officer; however the Site Managers have the authority to call on any Health and Safety Officer, regardless of their appointed site, for advice and support based on specialist expertise and availability.

IMS Management Representative

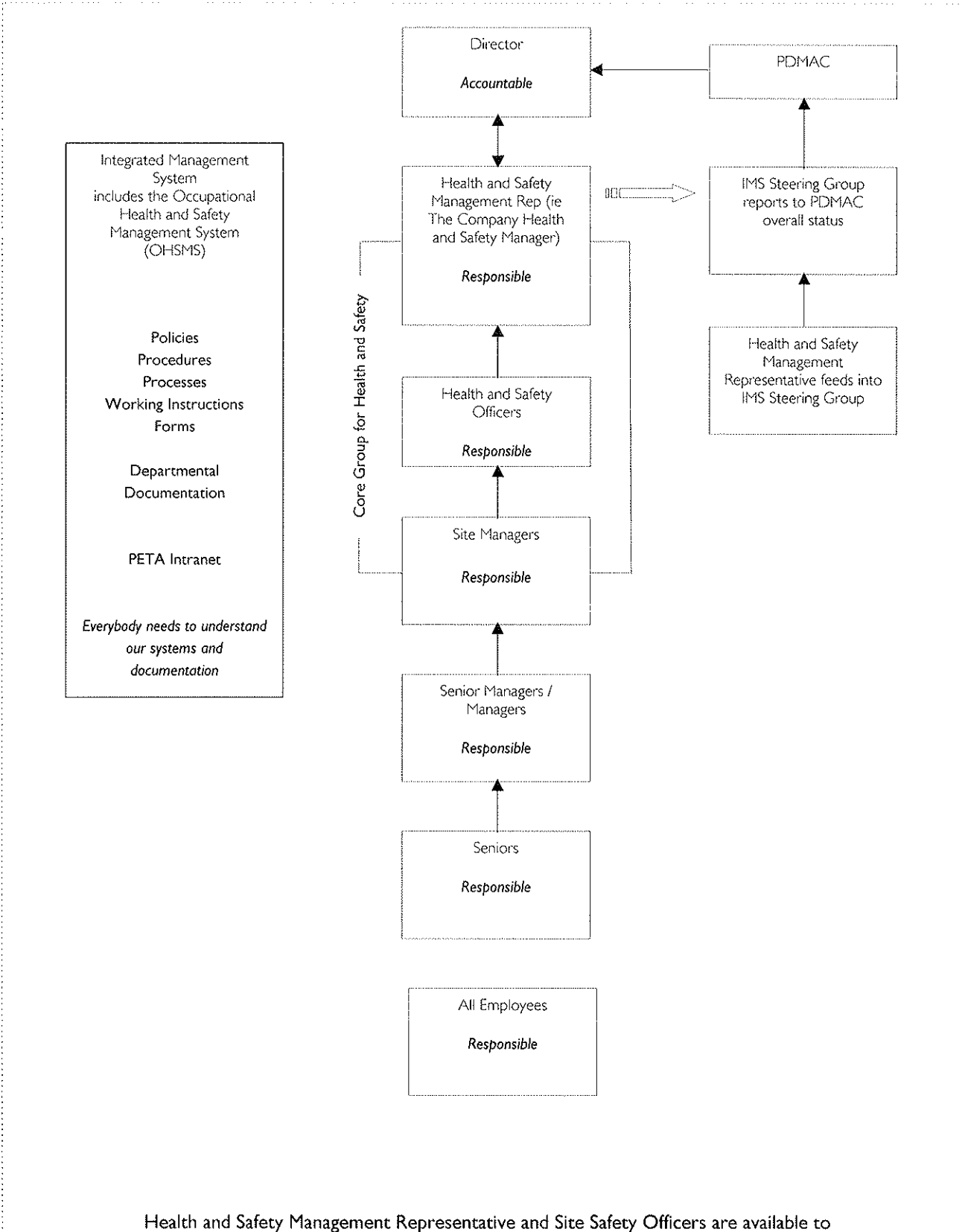
The IMS Management Representative is responsible for ensuring the Health and Safety Management and OHSAS 18001:2007 requirements are fully incorporated into the Integrated Management System and for liaising with PDMAC on matters relating to policy development and deployment.

IMS Consultant

The IMS Consultant will provide guidance to the IMS Management Representative on the integration of OHSAS 18001:2007 into the IMS System, develop in conjunction with the IMS Management Representative an audit programme for Health and Safety Management that evaluates compliance and provides opportunities to improve the effectiveness of the system, and where instructed to do so will carry out these audits.

The IMS Consultant will work closely with the PDMAC via the IMS Management Representative to identify changes to legislation and to assess legal compliance as stipulated within OHSAS 18001:2007 Clause 4.5.2.

Communication for OHSMS



Responsibility and Accountability for Achieving Safe Working Practice

Director

The Director is accountable for ensuring the occupational health and safety of all employees and other persons and to ensure that the appropriate standards are defined in the Company Safety Policy, distributed to departments, disseminated to staff and appropriately enforced.

Health and Safety Management Representative (Company Health and Safety Manager)

The Health and Safety Management Representative will co-ordinate activities with Site Managers and Health and Safety Officers to ensure:

- ▲ Employees, contractors and visitors are aware of safety procedures.
- ▲ Equipment, plant and substances used are suitable for the task and are kept in good working condition this includes the regular maintenance and service of equipment.
- ▲ The facilitation of adequate training, information, instruction and supervision to ensure that work is conducted safely.
- ▲ Appropriate steps are taken, so far as is reasonably practicable, to investigate and rectify any risk to health and safety arising from the work activity,
- ▲ Senior Management are advised on any health and safety issues that require their attention.
- ▲ Any accidents resulting in “lost time injury” or near miss events resulting in structural, plant or vehicle damage of any kind are properly investigated, reported and recorded in order to determine the cause factors and provide recommendations for improvement.
- ▲ Safe access to and egress from the workplace is maintained at all times.
- ▲ Managers and their staff are aware of and comply with appropriate health and safety legislation and other regulatory requirements that PETA subscribe to
- ▲ Working practices are regularly reviewed to minimise risk to health and safety.

Health and Safety Officer

- ▲ Each site within the PETA Ltd organisation will have a professional and qualified Health and Safety representative appointed to the role of Health and Safety Officer in order to co-ordinate on health and safety matters and to provide feedback to the Site Manager and Health and Safety Management Representative.
- ▲ The Health and Safety Officer is responsible for and is accountable in conjunction with the Site Manager, for the effective implementation of the health and safety policy, procedures and working instructions at the nominated site and for monitoring the controls in place to ensure compliance with all applicable aspects of health and safety legal requirements.
- ▲ The Health and Safety Officer will be the contact point for the Site Manager for any areas of clarification regarding compliance with the company wide health and safety working instructions and compliance with health and safety legislation. Any such requests should be made in writing (Company e-mails) unless the advice is related to an immediate health and safety matter that needs to be resolved.
- ▲ In the absence of the Health and Safety Officer (for whatever reason) the request for information should be made to any other member of the PETA Health and Safety Team.
- ▲ Details of the Health and Safety Officer can be found on the Contacts Sheet located on the Intranet.

Site Managers

The Site Manager is responsible for and is accountable for the effective implementation of the health and safety policy, procedures and working instructions at the nominated site and for monitoring the controls in place to ensure compliance with all applicable aspects of health and safety legal requirements.

Managers and Seniors

Departmental Managers are directly responsible for the day to day implementation and enforcement of this Health and Safety Policy. Other Managers, Heads of Departments and Seniors also hold responsibility for matters pertaining to health and safety within their area. This responsibility includes the effective communication and compliance of this policy through promotion of safe working practices, good housekeeping, enforcement in use of protective equipment, reporting of accidents and regular inspections for unsafe acts and conditions.

Employees

All employees benefit from adoption at all times of good health and safety practices, so reducing the risk of accident, injury and ill health to themselves and their fellow workers. Also the Health and Safety at Work Act 1974, Sections 7 and 8, and the Management of Health and Safety at Work Regulation 1999 require every employee to:

- ▲ Take all reasonable care for their own Health and Safety.
- ▲ Take reasonable care for the Health and Safety of anyone who may be affected by his / her acts or omissions.
- ▲ Co-operate with their employer and others to enable legal obligations to be met, and
- ▲ Not to recklessly or intentionally misuse or interfere with anything provided in the interest of Health and Safety at work.

In particular, employees have a duty of care to know, understand and comply with the Company Safety Policy, rules, regulations and working instructions.

Competence Training and Awareness (4.4.2)

Training procedures ensure all aspects of risk, responsibility and ability are taken into account.

Training and awareness will also be provided to personnel not employed by the company but who could be affected by the company's actions, such as visitors to site, contractors, agency staff, learners or delegates.

Training will include, but will not be limited to the following elements:

- ▲ The importance of conformance to the Company Health and Safety Policy, procedures and other recognised practices and arrangements.
- ▲ The individual's role in meeting these arrangements.
- ▲ The consequences of departure from these arrangements.
- ▲ Understanding the roles and responsibilities of normal or abnormal situations and how to react in an emergency incident.

As part of continual improvement, PETA Ltd will implement training initiatives for all employees on aspects such as legal and other requirements including updates, changes to processes and lessons learnt from accidents, incidents and near misses. This will include:

- ▲ Instruction to all new employees on the Company Safety Policy as part of their Induction Training.

- ▲ Managers receiving appropriate training to enable them to meet their safety obligations.
- ▲ New developments in safety which will be communicated to Department Managers, who will be responsible for cascading the information to staff.
- ▲ The Health and Safety Support Services Department providing information, training and support as required to ensure the company and the management team are able to comply with its legal obligations.

Communication, Participation and Consultation (4.4.3)

This section identifies how information is communicated to and received from employees and other interested parties on matters related to health and safety. These arrangements are documented and include consultation on:

- ▲ Policy and procedure development and change.
- ▲ Changes in the workplace affecting health and safety.
- ▲ Health and Safety Officer support and advice.
- ▲ IMS Advice Note system.

Communication (4.4.3.1)

Communication of all matters relating to the PETA Integrated Management System is achieved through the Intranet, Staff Noticeboards, Team Meetings, State of the Nation briefings and Staff Induction.

Participation (4.4.3.2)

All staff can participate in health and safety improvements using the IMS Advice Note system.

Section 3 Documentation (4.4.4)

Control of Documents (4.4.5)

Documented Procedures, Forms and Working Instructions are available for health and safety and are controlled as part of the Integrated Management System in accordance with IMS 4.01 which can be accessed on the intranet.

Section 4 Operational Control (4.4.6)

Safety Working Instructions

Safety Working Instructions are available on the Intranet for inspection by all employees. These Working Instructions are reviewed at regular intervals and new Working Instructions are issued, as required.

Learners and visitors to PETA sites will be made aware of the Safety Working Instructions as relevant. Contractors will also be expected to comply with Company procedures unless they can demonstrate that they have procedures as good as, or better than, the Company's.

A Safety Working Instruction is a written commitment to provide a basis of health and safety understanding for all Company employees and, as such, should be complied with at all times.

Failure to follow the true spirit of the Safety Working Instruction is likely to result in disciplinary action being taken.

Whilst the responsibility for introducing Safety Working Instructions lies with the IMS Consultant and Health and Safety Management Representative in conjunction with the IMS Management Representative any employee can suggest or put forward a Safety Working Instruction through the IMS Advice Note system.

The Safety Working Instructions are included on the intranet. Managers and Seniors are responsible for informing department members of changes as necessary.

Safety Working Instructions are periodically reviewed by the IMS Consultant or at the request of any employee, as the result of an accident, incident or action arising from an audit/inspection.

The management team has a duty to become familiar with the Company Safety Working Instructions and, in particular, the ones that are related to their areas of responsibility.

Personal Protective Equipment

PETA Ltd will supply protective equipment and clothing to its employees and learners where necessary. The equipment will conform to regulatory and other requirements and will be the most suitable type for the particular hazard.

Site Safety Requirements

The Site Safety section of the PETA Intranet will address activities relating to the following

Item	Activity	Legal Cross Reference	PETA Work Instruction
1	Display screen equipment and controls	Health and Safety (Display Screen Equipment) Regulations SI 1992/2792.	Display Screen Equipment
2	Risk Assessment	Management of Health and Safety at Work Regulations 1999/3242	Hazard Identification, Risk Assessment and Determining Controls
3	Control of Substances Hazardous to Health	Control of Substances Hazardous to Health Regulations SI 2002/2677	Control of Substances Hazardous to Health (COSHH)
4	Contractors	Health and Safety at Work etc Act 1974. Other legislation/regulations is cited within the work instruction	Contractors
5	Portable Appliance Testing	Electricity at Work Regulations	Portable Appliance Testing
6	Personal Protective Equipment	Personal Protective Equipment at Work Regulations SI 1992/2966	Personal Protective Equipment
7	Lift Truck Operations	Provision and Use of Work Equipment Regulations SI 1998/2306 and Lifting Operations and Lifting Equipment Regulations SI 1998/2307	Lift Truck Operation
8	Fire	Regulatory Reform (Fire Safety) Order 2005	Emergency Alarm and Lighting Testing Fire and Emergency Evacuation Fire Risk Assessment – Completion Fire Warden Duties – Additional Duties for Havant
9	Certificates of Equipment and Audits/Inspections	Provision and Use of Work Equipment Regulations SI 1998/2306 and Lifting Operations and Lifting Equipment Regulations SI 1998/2307 Control of Substances Hazardous to Health Regulations SI 2002/2677 Pressure Systems Safety Regulations 2000	

Hazard Analysis and Assessment

- ▲ The assessments identified in items 1, 2, 3, 6 and 8 will be undertaken by trained and competent staff and will be reviewed by the appointed Health and Safety Officer.
- ▲ The assessments will be subject to periodic review or will be reviewed after any accident, incident or near miss.
- ▲ The outcome of the review will be recorded along with any changes to procedures, working instructions or systems of work.

Contractors

The Health and Safety Management Representative in conjunction with the IMS Management Representative are responsible for the authorisation and maintenance of the Approved Suppliers List (Central) in relation to Contractors. The appointment of contractors falls within two categories:

Major Works

When there is a requirement to undertake major works such as:

- Building works
- Electrical installations, etc,

There is a requirement to complete the entire process of the Contractors Working Instruction.

Minor Works

When there is a requirement for some minor works such as:

- Replacement of a light fitting
- Fixing a leaking pipe
- Replacing a window

It is not necessary to complete the entire process of the Contractors Working Instruction. Where a contractor is already on the approved suppliers list then the works may proceed. If the Contractor is not on the approved suppliers list, reference must be made to the Contractors Working Instruction and obtain the necessary approvals.

Portable Appliance Testing (PAT)

The Site Manager is responsible for organising the annual portable appliance testing for each site in accordance with the relevant Working Instruction and associated forms.

New Machines and New Materials

The Company will ensure at all times that all machinery and new materials are safe to operate and conform to current legislation. The purchase and installation of such equipment will be in consultation with the appropriate Managers, Site Manager and the allocated Health and Safety Officer.

Before a potentially hazardous substance is brought on site, the Site Manager must be notified and a COSHH assessment completed. If the substance is then accepted onto site, this must then be entered onto the Assessment Register for the relevant site on the PETA Intranet.

First Aid

Assessment of first aid requirements takes place for each site. Details and location of all qualified First Aiders and the siting of the nearest First Aid box are given on notices around the sites and details are available via the company intranet.

Lift Trucks

Lift trucks used in the lift truck training area are maintained in accordance with a servicing agreement with the equipment supplier. However it is still the responsibility of the Department Manager to ensure all statutory testing and daily inspections are carried out and that records are available to support this activity.

Emergency Preparedness and Response (4.4.7)

Fire, emergency and evacuation procedures are in place, which are tested regularly with recorded outcomes. These procedures are reviewed annually or after an incident or exercise has taken place.

Training and awareness records demonstrate employees understanding of actions required in an emergency situation. It is the responsibility of the host to make visitors and contractors aware of the requirements upon arrival or commencement of work. Fire and Emergency Evacuation Working Instruction refers.

Section 5 Checking (4.5.)

Performance Measurement and Monitoring (4.5.1)

IMS Procedures provide a basis for assessing the performance of the health and safety system on a regular basis and include:

- ▲ The provision of quantitative and qualitative measures.
- ▲ Measures to assess the management programmes, operational systems, legal applicability and regulatory compliance on a pro active basis.
- ▲ Measures to monitor occupational health and near misses on a proactive basis and accidents, incidents and ill health and on a reactive basis.
- ▲ Methods for recording health and safety data in order to facilitate corrective and preventive action analysis.

Evaluation of Compliance (4.5.2)

As part of the IMS review programme, compliance with regulatory and other legal requirements will be assessed as part of site safety audits and reported on at the IMS review forum and the six monthly management review

Incident Investigation, Non Conformity, Corrective Action and Preventive Action (4.5.3)

The Site Manager holds copies of form F2508, for reporting notifiable accidents. Employees who are involved in an accident etc, on the Company's premises, however slight, must notify their superior as soon as possible so that an official record can be kept. Should it be necessary to send an employee to hospital for treatment, arrangements are to be made for transportation to and from the hospital.

The Site Manager should advise the appointed Health and Safety Officer and the Health and Safety Management Representative of any reportable incidents that have occurred.

In the event of a serious accident, an accident investigation report is to be completed at the earliest opportunity. The Site Manager should involve the Health and Safety Officer or another member of the PETA safety team in the investigation process. Any equipment or evidence, which may be related to the accident, is not to be moved other than to make the area safe. Where such evidence has to be moved, sufficient photographic evidence should be acquired first.

Near misses must be reported to the appointed Health and Safety Officer and copied to the Health and Safety Management Representative. Accidents requiring hospital treatment, or absence, must be reported to the Personnel department and the Health and Safety Officer will liaise with the Site Manager in order to determine cause and corrective action required.

Statistics will be maintained by the personnel department and made available to the IMS Steering Group and ultimately the Management Review in order to determine trends where both corrective and preventive action controls can be applied.

Records and Record Management (4.5.4)

Record control for health and safety management is in accordance with Procedure IMS 4-02 The Control of Records.

Audit (4.5.5)

Audits of the Integrated Management System take place in accordance with IMS 8-03.

In addition, a structured programme of site safety inspection/audits take place under the authority of the IMS Management Representative. The process for achieving this is:

- ▲ The IMS Consultant is responsible for preparing a schedule of audits that must be undertaken each year
- ▲ The schedule will be made available to the IMS Management Representative who will nominate competent staff to undertake the audit and include within the IMS system.
- ▲ Any deviation to the schedule must be agreed with the IMS Management Representative in advance.
- ▲ An Internal Audit Report will be prepared by the nominated auditor in conjunction with the IMS Consultant at every scheduled visit.
- ▲ The completed report will be verified by the IMS Consultant who will then forward the original report and associated IMS Advice Notes to the IMS Administrator for action.
- ▲ The IMS Administrator will action the report and:
 - Enter the IMS Advice Notes raised into the system and record the number on the original report
 - Retain a copy of the original report on file for future reference
 - Forward the original report and associated IMS Advice Notes to the Site Manager for action and advise the IMS Management Representative of the outcomes
- ▲ The Site Manager is to action the report as a matter of urgency.

Section 6 Management Review (4.6)

A review of the Integrated Management System takes place twice a year (See Work Instruction CW0023) by senior management and incorporates health and safety. These reviews are supported by records.