

HEALTH AND SAFETY POLICY FOR PHARMED UK

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CONTENTS

1. Health and Safety Statement.....	3
Organisation for Health and Safety	4
Health and Safety Governance – Pharmed UK.....	7
3. Health and Safety Arrangements	8
3.1 Risk Assessment.....	8
3.2 Accidents, near misses and first aid	8
3.3 Slips, Trips and Falls	10
3.4 Manual Handling.....	11
3.5 Lone Working.....	11
3.6 Control of Substances Hazardous to Health (COSHH).....	12
3.7 Fire.....	13
3.8 Display Screen Equipment (DSE)	14
3.9 Electricity, Plant and Equipment Safety	15
3.10 Personal Safety and Personal Protective Equipment	16
3.11 Visitors and Contractors	16
3.12 Health, Safety and Welfare (Working Environment)	18
3.13 The Use of Vehicles	20
3.14 Workplace Transport.....	21
3.15 Health and Safety Training	21
3.16 Monitoring of Safety	21
3.17 Information for and Consultation with Employees	21

HEALTH AND SAFETY POLICY STATEMENT

At Pharmed UK we recognise our duties under current health and safety legislation and we will endeavour to meet the requirements of this legislation and maintain a safe and health working environment.

Our managers and supervisors are informed of their responsibilities to ensure they take all reasonable precautions, to ensure the safety, health and welfare of those that are likely to be affected by the operation of our business.

Pharmed UK recognises its duty to make regular assessment of the hazards and risks created in the course of our business.

We also recognise our duty, so far as is reasonably practicable:

- To meet our legal obligations to maintain safe and health working conditions
- To provide adequate control of the health and safety risks so identified
- To consult with our employees on matters affecting their health and safety
- To provide and maintain safe plant and equipment
- To provide information, instruction, training where necessary for our workforce, taking account of any who do not have English as a first language
- To ensure that all workers are competent to do their work and to give them appropriate training
- To prevent accidents and cases or work related ill health
- To actively manage and supervise health and safety at work
- To have access to competent advice
- To see continuous improvement in our health and safety performance and management through regular (at least annual) review and revision of this policy and
- To provide the resource required to make this policy and our Health and Safety arrangements effective.

We also recognise:

- Our duty to co-operate and work with other employers when we work at premises or sites under their control to ensure the continued health and safety of all those at work; and
- Our duty to co-operate and work with other employers and their workers, when their workers come onto our premises or sites to do work for us, to ensure the health and safety of everyone at work.

To help achieve our objectives and ensure our employees recognise their duties under health and safety legislation whilst at work, we will also inform them of their duty to take reasonable care for themselves and for others who might be affected by their activities. We achieve this by explaining their duty and setting out our company health and safety rules in an Employee Safety Handbook which is made available to every worker employed by us.

In support of this policy a responsibility chart and more detailed arrangements have been prepared and are reviewed on a periodic basis.

Signed:



General Manager

Date: 13/2/2020

Organisation for Health and Safety

1.0 Chief Executive Officer

Overall responsibility for Health and Safety in the business lies with the Chief Executive Officer, and in the UK, the General Manager.

In particular, this responsibility requires him to:

- 1.1. Provide the appropriate leadership in the Company, ensuring that all employees are competent, having sufficient knowledge and skills to carry out their duties in a proper manner;
- 1.2. Provide the resources necessary to implement the commitments made in this policy;
- 1.3. Ensure that Health and Safety matters are considered by the manager and employees in each department – and allocating duties accordingly;
- 1.4. Ensure effective communication with all employees;
- 1.5. Ensure regular formal assessment of Health and Safety activities are conducted;
- 1.6. Comply with all statutory requirements relating to Health and Safety, in particular the need to maintain an effective programme of risk assessment.

2.0 Directors

As managers in their respective departments each director is responsible for:

- 2.1. Providing leadership for the implementation and effective operation of the Health and Safety policy;
- 2.2. Leading through example by following all safety rules and procedures, using accepted safe working practices and setting high personal standards in Health and Safety;
- 2.3. Creating an environment of openness, no blame, trust and mutual respect which allows employees, contractors and visitors alike, to excel in Health and Safety performance;
- 2.4. Knowing the Health and Safety requirements of the jobs performed by the people they are responsible for;
- 2.5. Ensuring that safety rules, procedures and personal protective equipment are utilised in order to prevent near misses, injuries and illnesses;
- 2.6. Ensuring that visitors to Group premises fully comply with the Health and Safety policy;
- 2.7. Ensuring that staff follow safe working practices;
- 2.8. Auditing work practices and taking prompt action to correct deficiencies with an appropriate priority.

3. Department Managers

The Department Managers report to their appropriate Director.

Their duties include:

- 3.1. Clearly communicating the contents of the Health and Safety policy to everyone in the workplace;
- 3.2. Ensuring effective implementation of the Health and Safety Policy in their areas of responsibility;

- 3.3. Ensuring that induction training is provided and that there is continuing supervision, where necessary, of all relevant employees;
- 3.4. Identifying and acting upon any identified training needs;
- 3.5. Reporting any hazard or defect to plant, equipment, stock and buildings to the General Manager.
- 3.6. Leading through example by following all safety rules and procedures, using accepted safe working practices and setting high personal standards in Health and Safety;
- 3.7. Creating an environment of openness, no blame, trust and mutual respect which allows employees, contractors and visitors alike, to excel in Health and Safety performance;
- 3.8. Knowing the Health and Safety requirements of the jobs performed by the people they are responsible for;
- 3.9. Ensuring that safety rules, procedures and personal protective equipment are utilised in order to prevent near misses, injuries and illnesses;
- 3.10. Ensuring that visitors to UK premises fully comply with the Health and Safety policy;
- 3.11. Ensuring that staff follow safe working practices.

4. Site person responsible for Health and Safety

The Site person responsible for Health and Safety (via their appointed representative) is responsible for the day-to-day implementation of health and safety in the company. These responsibilities include:

- 4.1. Ensuring that the Chief Executive Officer and the Leadership Team are provided with any information necessary in order to fulfil their responsibilities under this policy, including changes in applicable laws or the advent of new legislation on Health and Safety;
- 4.2. Ensuring that all employees effectively implement this policy;
- 4.3. Enforcing Health and Safety related actions and to escalate directly and without hesitation to Senior Management where these actions are not satisfactorily completed;
- 4.3. Ensuring that office welfare facilities are kept up to the required standards;
- 4.4. Ensuring compliance with all risk assessments carried out within the UK Head Office;
- 4.5. Ensuring good housekeeping is maintained in areas at all times and undertaking inspections of the company facilities, using specialist support when necessary;
- 4.6. Undertaking risk assessments in accordance with current legislation and, through the line management team, implementing any control measures identified in the risk assessment;
- 4.7. To carry out safety audits on the UK premise and delegate the necessary actions to the appropriate manager in order to ensure that deficiencies are effectively corrected.

6. Site Safety Representative

A Site Safety Representative has been nominated for the UK site. The SSC will report on a regular basis to the UK General Manager. They will be authorised to control, monitor and record Health and Safety activities on a day to-day basis.

The duties of a SSC will include, being responsible on their premises for:

- 6.1. Completing UK documents relating to Health and Safety;
- 6.2. Communicating and cascading relevant Health and Safety information to the site
- 6.3. Reporting on all accidents as required;
- 6.4. Assisting in safety awareness;
- 6.5. Implementing DSE, COSHH, Manual Handling and risk assessments;
- 6.6. Monitoring the implementation, and reviewing the effectiveness of Health and Safety policies and procedures;
- 6.7. Carrying out site safety audits as required;
- 6.8. Ensuring the correct number of staff with specific Health and Safety responsibilities (e.g. designated first aiders, fire wardens);
- 6.9. Producing relevant Health and Safety management information as required;

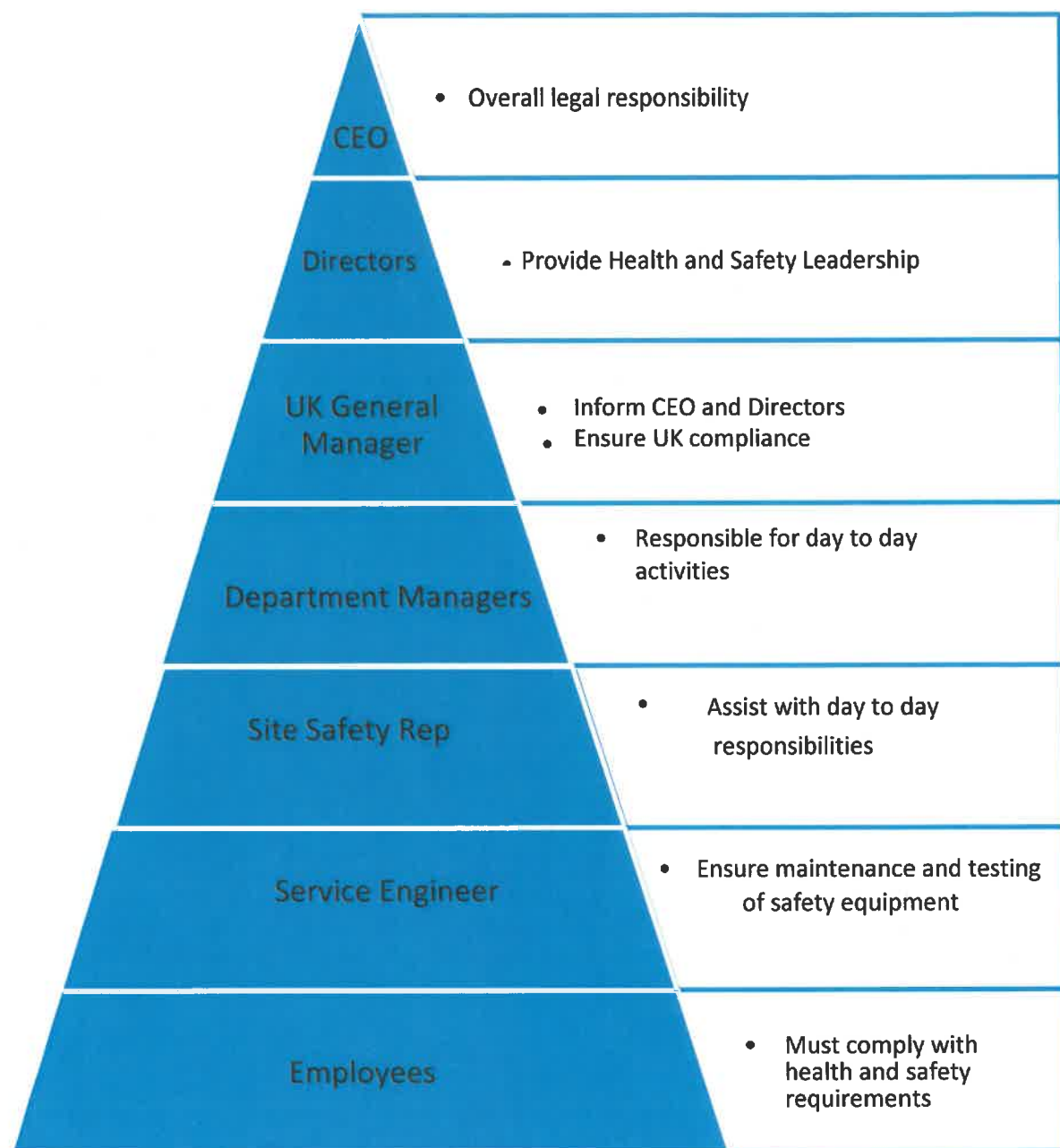
7. Employees

The successful implementation of this policy is dependent on all employees recognising and adhering to the commitments established in this Policy Statement.

In order to eliminate or minimise the risk of an accident or incident, all employees are obliged to:

- 7.1 Work in accordance with the instructions and training they have received;
- 7.2. Not intentionally or recklessly interfere with or misuse any item provided in the interests of health, safety and welfare;
- 7.3. Report any situation in which they consider that they have not received sufficient instructions and training;
- 7.4. Report any hazardous situation or defective equipment to their manager; Defective equipment is to be taken out of use until effectively repaired or replaced. Employees are instructed not to carry out any corrective actions without prior approval or specific training/instructions on how to do the work;
- 7.5. Report accidents and incidents in accordance with identified procedures;
- 7.6. Employees are expected to attend and carry out work in a fit and proper state with no impairment from the effects of alcohol or illegal drugs. Being unfit for work due to alcohol consumption or drugs is a disciplinary offence and appropriate disciplinary action will be taken;
- 7.7. Where necessary, wear protective clothing and equipment as required.

Health and Safety Governance – Pharmed UK



Health and Safety Arrangements

3.1 Risk Assessment

Legal Responsibilities

It is recognised that the preparation of risk assessments is required under the provisions of various items of legislation, including the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999.

Regulation 3 of the Management of Health and Safety at Work Regulations 1999 requires formal risk assessments to be carried out to determine the risks associated with working operations. These assessments will need to identify risks to both employees and other persons, who may be affected, for example contractors, visitors, members of the public, etc.

Arrangements within Pharmed UK

Within Pharmed, risk assessments are generally generic risk assessments which are related to locations under the control of the Company in the UK, ie., Head Office and associated warehousing locations.

The completed risk assessments will be made available to all persons who may be affected by the activities identified within the assessments. Records of all risk assessments will be kept on file electronically and be available on the UK Shared drive.

The completed risk assessments are used to identify appropriate controls, taking account of Health and Safety Executive (HSE) guidance materials and external support services as required. The department managers and all other employees are to ensure, as far as is reasonably practicable for them to do so, that the required controls are in place.

Responsibility

The General Manager will ensure that risk assessments are in place for all activities carried out by UK employees. He will also ensure that all risk assessments are kept up to date, reviewed annually and any significant changes will lead to a reassessment of risk. This may be delegated to the UK Site safety representative.

Department managers will identify employees who may require individual risk assessments and ensure that these assessments are carried out, for example, expectant/new mothers, and young people by communicating to the UK General Manager who will ensure the task completed. He will ensure risk assessments are in place for any UK staff that may carry out activities in third party sites ie., service engineers.

3.2 Accidents, near misses and first aid

Legal Responsibilities

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013 place a duty upon an employer to report certain incidents and accidents to the relevant enforcing authorities within prescribed time limits.

A record must be kept of all such incidents and accidents, these records must be kept for a minimum of three years.

The record must contain the following information:

- The date and time of the incident.
- The full name and address of the person(s) affected and their occupation.
- The person completing the entry if different from above.
- The occupation of the person(s) affected.
- The nature of the injury or condition.
- The place where the accident or near miss occurred.
- A brief, but clear description of the circumstances.

Definitions

An accident can be defined as an unplanned event that causes injury to persons, damage to property or a combination of the both.

A near miss can be defined as an unplanned event which does not cause injury or damage, but could do so.

Arrangements within Pharmed UK

Duties of Employees

- In addition to completing the accident/incident report form, any accident or dangerous occurrence must be reported to a responsible person.
- If an injury renders an employee unable to complete the accident/incident report form, this should be completed by the First Aider, a witness or colleague.
- The employee's account of the accident or incident must be entered as soon as possible after the event.

Reporting Duties of Directors, Managers and Team Leaders

- The General Manager will ensure that the accident/incident report form is available electronically at the UK location and is also accessible via the Group Intranet.
- If an injury, damage incident or near miss is reported to a director or manager, they must ensure that appropriate records are kept.
- Completed accident forms must be forwarded to the UK General Manager who will investigate each and every accident/near miss. He may delegate to the Site Representative who will also keep the company records and produce statistics as necessary.
- If the accident results in over seven consecutive days of incapacity to work, it is reportable under RIDDOR on form F2508 or form F2508A to the HSE Incident Contact Centre.
- Major incidents as described in RIDDOR must be reported immediately to the General Manager who will ensure the relevant form is completed and forward this to the Incident Contact Centre within the specified period as laid down in the current RIDDOR Regulations.
- A copy of the completed form and any written reports, sketches etc. must be kept with other Company records and to assist the insurers in the event of a claim.
- The manager must keep records of any developments to the injured person's health, up to and including a return to normal duties.
- The manager must check that a self-certification form submitted by an injured employee is properly completed to reflect that the absence was caused by a work-related accident or incident.
- Any relevant information must be forwarded to the General Manager.

First Aid

- A fully stocked first aid box is maintained at each location. The contents are maintained by the appointed person at each location.
- Appointed persons will receive appropriate training and refresher training.

- The number of appointed persons will be sufficient for those premises.
- The names of current first aid personnel are displayed in the premises.
- It is expected that employees working at client premises will have access to first aid facilities provided by the client organisation.

3.3 Slips, Trips and Falls

Legal Responsibilities

The most common cause of injuries in the workplace is the slip or trip.

The Health and Safety at Work etc. Act 1974 (HSWA) requires employers to ensure the health and safety of all employees and anyone who may be affected by their work. This includes taking steps to control slip and trip risks.

Employees must not endanger themselves or others and must use any safety equipment provided.

Manufacturers and suppliers have a duty to ensure that their products are safe. They must also provide adequate information about appropriate use.

The Management of Health and Safety at Work Regulations 1999 build on the HSWA and include duties placed on employers to assess risks (including slip and trip risks) and where necessary take action to safeguard health and safety.

The Workplace (Health, Safety and Welfare) Regulations 1992 require floors to be suitable, in good condition and free from obstructions. People must be able to move around safely.

Arrangements within Pharmed UK

Pharmed will take all reasonably practicable measures to ensure that workplaces under its control are safe and without unnecessary risks of slips and trips to all persons needing to access them.

In order to achieve this Pharmed will ensure that it provides a safe working environment free from slip, trip and fall hazards by:-

- a) Ensuring that all potential slip and trip hazards in the workplace are identified
- b) Controlling adequately any risk to a person's safety to the lowest level reasonably practicable.
- c) Where necessary the appropriate risk assessments and risk reduction methods are in place.

Responsibilities

Managers will ensure that good standards of housekeeping are maintained within their areas

Site Safety Rep/delegated site staff will carry out monthly safety audits to ensure that there are no hazards within their premises which could cause any slips, trips or falls.

Employees are responsible for keeping their work area tidy and report any problems to their manager.

3.4 Manual Handling

Legal Responsibilities

The Manual Handling Operations Regulations 1992 apply to a wide range of manual handling activities, including lifting, lowering, pushing, pulling or carrying. The regulations require employers to:

- Avoid the need for hazardous manual handling, so far as is reasonably practicable;
- Assess the risk of injury from any hazardous manual handling that can't be avoided;
- Reduce the risk of injury from hazardous manual handling, so far as is reasonably practicable.

Definitions

A manual handling operation is defined as any transporting or supporting of a load including lifting, putting down, pushing, pulling, carrying or moving by hand or bodily force. The assessment that the Company will conduct will take into account the following factors;

The Person – The strength, height, age and medical history all determine a persons' capabilities and will be given due consideration by the Company;

The Environment – Factors such as lighting, space and temperature will be evaluated; **Load** – Weight, ease of handling and number of required movements will be taken into account;

Task – Required body movements and the distance the load has to travel will be assessed.

Arrangements within Pharmed

All activities which involve manual handling tasks will be assessed to identify if an alternative method can be adopted. If such an alternative is not available the appropriate manager will ensure that the employees involved in these tasks have received adequate training in manual handling techniques.

Responsibilities

Duties of Employees

Employees must ensure that they follow any safe systems of work when performing manual handling operations. In addition, they must:

- Report to their manager any personal conditions that may affect their ability to perform manual handling operations. Any such report will be treated in the strictest confidence and will always be looked upon sympathetically.
- Comply with instructions and training that is provided in safe manual handling activities and use any equipment that is provided to minimise the risk of accident or injury.
- Report any problem relating to the activity to a manager.

Duties of Directors and Managers

Directors and Managers must ensure that:

- Employees are properly supervised.
- Supervision, information and training be provided to any persons carrying out manual handling activities and that new employees receive induction training prior to starting work.

3.5 Lone Working

Legal Responsibilities

Under the Health and Safety at Work Act 1974 employers are made generally responsible for the health and safety of all their employees and others who might be affected by their work activities. This responsibility includes employees who work alone. However, employees have their own duty

under the Act to take reasonable care of their own health and safety and that of anyone else that might be affected by the work activity.

Risk assessments must pay particular attention to these aspects in relation to the work carried out by the company. Such risk assessments must consider the availability of first aid, and that telephone communication is possible, combined with the potential severity of injuries. Where the risk is high then lone working should be prohibited.

Arrangements within Pharmed

Managers must identify any employee who will be required to work alone. Any such employees must be subject to an individual risk assessment to ensure that they are capable of carrying out the necessary work.

The manager will ensure that employees involved in this type of work are familiar with the relevant risk assessments and method statements. The manager will also ensure that the appropriate control methods are in place.

Responsibilities

Employees are required to follow the safe working procedures, which include provision of first aid, communication procedures, security measures and awareness of emergency procedures. Employees are required to co-operate to ensure safe working and to report any concerns to a director or manager.

Any employee who is in doubt about which tasks can safely be carried out alone or has any concerns regarding their personal safety should always check with a manager beforehand.

3.6 Control of Substances Hazardous to Health (COSHH)

Legal Responsibilities

The Control of Substances Hazardous to Health Regulations 2002 (COSHH) (as amended) require employers to control substances that can harm workers' health.

Arrangements within Pharmed UK

The company recognises that exposure to hazardous substances may cause injury and ill health. The use of hazardous substances in the business is limited to domestic products in the office and small quantities of commercial products during maintenance and site based work. A formal COSHH assessment is completed using the specific COSHH assessment form.

The hazardous products in use have been assessed as creating minimal risk and the control measures identified include the following matters:

- Storage in original containers with secure tops;
- Use in accordance with manufacturers' instructions;
- No mixing of chemicals;
- Correct personal protective clothing to be used.

Responsibilities

The General Manager will ensure that all substances brought into premises occupied by Pharmed UK are subject to a COSHH assessment and stored in suitable, secure storage when not in use.

Department managers and all employees using the hazardous substances are responsible for ensuring the control measures are implemented.

3.7 Fire

Legal Responsibilities

The Company will comply with all current legal requirements as defined in the Regulatory Reform (Fire Safety) Order 2005 and promote and encourage promotion of fire prevention practices. Regular risk assessments will be carried out and reviewed and where recommended, appropriate fire fighting equipment, detectors and alarms will be installed. Fire alarm, emergency lighting systems and similar fire protection equipment will be electrically tested on an annual basis.

Arrangements within Pharmed UK

The General Manager is responsible for ensuring that the procedural provisions of the fire risk assessment are maintained. The fire risk assessment is carried out by the Site Safety Rep, using specialist support as necessary.

As a matter of routine, the following fire precautions and fire procedures are implemented.

- The fire evacuation procedure is displayed at strategic points throughout Pharmed UK
- Emergency lighting is provided at strategic points in the building
- The fire assembly points are identified
- The fire extinguishers are positioned at strategic points in the building and are checked and serviced annually by an external specialist contractor
- Fire evacuation routes are kept free from obstructions
- Fire evacuation routes are clearly marked
- Training in Fire Evacuation Procedures is carried out at induction and subsequently on an annual basis
- Waste materials are removed from the buildings on a daily basis
- Packaging materials are disposed of as soon as they are removed from goods

A Fire Log Book will be kept at the location by the appointed person and will be audited regularly.

A Fire Marshal has been appointed and will undergo necessary training and refresher training as required.

Responsibilities

Actions in the event of Fire or the possibility of Fire

Employees should report any concerns they have about fire hazards to a director or manager so that the Company can take the appropriate measures to eliminate the problem.

If a fire is discovered the alarm should be raised by the appropriate method. This should be the first action taken on discovery of any fire, however small, and the Company will always support employees who operate the fire alarm system in good faith, regardless of whether or not it is ultimately determined that a fire existed.

All persons are responsible for summoning the fire brigade in the event of fire. The Company does not require persons to attempt to extinguish a fire, but this action may be taken if it is safe to do so and the person has received adequate training in the safe use of fire fighting equipment.

Upon hearing the fire alarm immediate evacuation of the building must take place with re entry strictly prohibited until the fire brigade officer or the company's appointed person declares that it is safe to do so. Employees must be aware that the silencing of the fire alarm system should never be taken as an indication that it is safe to re-enter the building.

Fire Drills

Fire evacuation drills will be carried out at least once a year with the date of each drill recorded in the fire safety logbook along with evacuation times and the approximate number of participants.

Any ensuing required actions identified as a result of the drill will also be recorded along with any relevant miscellaneous information.

3.8 Display Screen Equipment (DSE)

Legal Responsibilities

The Health and Safety (Display Screen Equipment) Regulations 1992 requires employers to carry out an analysis of any workstation where a person uses display screen equipment for periods during the day of more than 1 hour continuously. This applies to home working as well as office and similar locations.

Arrangements within Pharmed UK

Eye and eyesight tests

Extensive research has shown that there is no evidence that VDU's can cause disease or permanent damage to eyes. However, it is acknowledged that long spells at a VDU screen can lead to tired eyes and this may make you aware of an eyesight problem which had not noticed before. The user must ensure that their VDU is well positioned and properly adjusted and that workplace lighting is suitable. Information is available on the Pharmed UK Intranet which gives guidance on ensuring correct seating and workstation set up.

An eye test should be sought from an Optician of choice if there are concerns about eyesight for a qualifying DSE user, the company will reimburse you with the cost of the test.

Rest Breaks

The purpose of a rest break from DSE is to prevent the onset of fatigue. To achieve this objective and where necessary, the company will seek to incorporate changes of activity into the working day. Where possible, the user will be given the discretion to decide the timing and extent of off screen tasks.

Any employee who believes that his or her workload does not permit regular screen breaks must bring this to the attention of management.

Responsibilities

Assessment of the Workstation

DSE users will be invited to assist the Company in providing a comfortable and safe working environment and may be asked to complete self-assessment forms.

All new starters will be given information on DSE working as part of their health and safety induction process

It is the Company's policy to re-assess any workstation that is to be used by a pregnant woman and for this to take place, it is important that staff inform a member of management that they may be pregnant as soon as they are able to. However, although it is Company policy to carry out specific risk assessments for pregnant workers there are no legal obligations for an employee to inform the Company of a pregnancy.

3.9 Electricity, Plant and Equipment Safety

Legal Responsibilities

The Provision and Use of Work Equipment Regulations 1998 and the Lifting Operations and Lifting Equipment Regulations 1998 cover responsibilities relating to inspection and testing to ensure safety of Plant and equipment.

There is a duty on employers in that they must ensure that all electrical equipment is properly constructed, installed and maintained and that installations are suitable for the environment in which they are used.

Therefore the Company will ensure that all electrical equipment is inspected and tested by a competent person in order to check that critical electrical safety factors are operational.

Arrangements within Pharmed UK

A schedule re: tests and inspections for plant and equipment is maintained by Site and any statutory certificates are kept electronically. All statutory inspections are carried out and any relevant calibration and certificates held.

The equipment is subject to a range of inspection and test procedures in accordance with the following schedule:

- a) All employees have the responsibility to visually check for defects to the equipment and any cables, attachments etc. that may be used during the working day. Any defects or damage (either actual or suspected) are reported to their manager for further investigation and appropriate repairs or replacement as necessary. Any damaged equipment is to be taken out of use until effective repairs or replacement has taken place.
- b) In addition to the above, a combined inspection and test of portable electrical equipment is carried out by a competent person. The frequency of the inspection and test is determined by taking account of the type and use of the equipment. Records of the inspection and test results are kept by the Site representative.
- c) Lifting equipment and lifting accessories are subject to thorough examination and inspection in accordance with statutory requirements in accordance with LOLER Regulations.

Responsibilities

The fixed electrical installation at all premises is subject to inspection by a competent electrician every 5 years. Any recommendations made following the inspection are to be implemented as soon as practicable. Copies of such inspection and tests will be held on site.

In addition, the Site will ensure that emergency evacuation lighting and fire alarm systems, where fitted, are inspected and tested by a competent person on an annual basis. Records of such inspections and tests will be kept available on the premises at all times.

Summary

Accidents involving electrical, lifting equipment or other plant can have very serious consequences. To help prevent accidents, all employees are advised to follow four basic rules:

- Report faulty or damaged equipment, electrical leads, plugs or sockets to a manager and do not attempt to use the appliance further.
- Never try to repair faulty equipment yourself.
- Never use electrical equipment in damp surroundings unless you know that it is suitable for that purpose.
- Never bring personal items of electrical equipment to work with you.

3.10 Personal Safety and Personal Protective Equipment

Legal Responsibilities

Pharmed recognises that it is under a general duty to ensure the health, safety and welfare of employees and to provide adequate supervision and training. This is the duty of care referred to within the Health and Safety at Work Act 1974. and applies to visitors and contractors also.

Employees are placed under a legal obligation to protect themselves, and any others who may be affected by their acts or omissions, as far as is reasonably practicable.

Arrangements within Pharmed UK

Personal Protective Equipment (PPE)

Risks to health and safety are, whenever practicable, eliminated at source or minimised by a range of procedures targeted at reducing the risks for all who may be exposed to the risk.

If the risks cannot be adequately controlled by other means, then PPE will be provided for employees. The type of PPE provided is determined by the risks presented.

All engineers have been issued with a full set of PPE as detailed in the Risk Assessment requirements.

Employees are required to:

- a) Care for the equipment in a proper manner.
- b) Wear/use the PPE provided when the risk assessment and/or safe procedure identify that it is necessary to do so.
- c) Inspect the equipment and report any defect to their Manager.
- d) Report any circumstances where the PPE provided is considered to be unsuitable.

Failure to comply with the Company's requirements relating to the use of PPE is considered to be a serious offence and disciplinary proceedings may be invoked if the appropriate PPE is not worn.

General Responsibilities of Employees

In order to help maintain their personal safety, employees must:

- Comply with any risk assessment requirements.
- Comply with any safe systems of work.
- Avoid horseplay or practical jokes.
- Never cut corners or take unnecessary risks.
- Report to a manager any concerns regarding safety or security.
- Consider the implications and consequences of actions before undertaking a task.

Summary

Personal safety is an issue that affects all members of staff. The Company will treat with sympathy, understanding and discretion all concerns regarding personal safety and will always attempt to alleviate any such problems. With this in mind, all employees are encouraged to participate in discussion regarding personal safety.

3.11 Visitors and Contractors

Legal Responsibilities

Under Section 3 of the Health and Safety at Work Act 1974 employers have a duty to ensure the health, safety and welfare of people not in their employment, but who may be affected by the activities of their undertaking. The Act places a general duty of care upon those who have control of

non-domestic premises to which visitors are admitted. "Visitors" include clients, other members of the public, representatives, contractors and any unauthorised persons (trespassers).

The Approved Code of Practice accompanying the Management of Health and Safety at Work Regulations 1999 require that visitors are given appropriate information and instructions regarding risks relevant to their health and safety. This should include emergency procedures within the premises, and if appropriate, identities of persons appointed to deal with emergencies. Visitors should be adequately supervised whilst on Company premises to ensure that they do not endanger themselves or others.

The Occupiers' Liability Act 1957 imposes a duty of care on occupiers to ensure that visitors are reasonably safe whilst on the premises and makes particular reference to children who are likely to be at greater risk than adults. The later Occupiers' Liability Act 1984 includes an important amendment which places the same duty of care upon unauthorised personnel such as trespassers.

Arrangements within Pharmed UK

Risk assessments should take account of risks which may be created by a visitor, as well as risks to which visitors may be exposed.

- Visitors should be supervised whilst on the premises.
- Access to unauthorised areas should be made difficult and suitable warning signs should be visible in potentially hazardous areas such as the stores.
- Visitors must be advised of any specific risks to which they may be exposed whilst on the premises.
- Visitors must be made aware of emergency procedures including the location of assembly points and must be accounted for during emergencies and evacuation drills.
- Due consideration must be given to security when the premises are unoccupied.

The three most important steps to take are as follows:

- Ensure that a responsible person knows the whereabouts of each visitor at all times.
- Ensure, when necessary, that all visitors are made aware of the arrangements for health and safety and the emergency procedures which may apply to them.
- Take reasonable steps to prevent visitors, including trespassers, from becoming exposed to any hazards.

Responsibilities

Control of Contractors and Visitors

Contractors visiting the company to carry out work, do so only with the express consent of the General Manager. Written orders for the work will have been issued in advance and it is implied that the contractor has the required skills and competencies to complete the work.

A risk assessment should be completed by the contractor and safe procedures are agreed with the manager before works commence, taking particular account of:

- staff access to the premises
- storage of materials
- working at heights
- use of plant and equipment
- any other activity introduced by the contractor that affects the safety of employees or other visitors.

All visitors report to the reception area where they are to sign in the visitors' book and wait for their host.

Contractors working without a permanent host are expected to work in accordance with their risk assessment and, in particular, any precautions established to deal with lone working.

No hot work will be undertaken on Pharmed UK premises without prior agreement of the General Manager/Health and Safety Representative

3.12 Health, Safety and Welfare (Working Environment)

Legal Responsibilities

Various regulations cover the Working Environment including and in particular the Workplace (Health, Safety and Welfare) Regulations 1992 relate to the working environment and issues of good housekeeping. The regulations also require that workplace floors and all access routes must, as far as reasonably practicable, be kept free from obstructions, articles or other items or substances that are likely to cause slips, trips or falls.

These regulations expand on the general duty under the Health and Safety at Work Act 1974 and also cover welfare facilities including temperature, ventilation, lighting and workspace. The regulations also define standards for accommodation for clothing, facilities for changing, rest and eating areas, and washing and sanitary facilities.

The Control of Substances Hazardous to Health Regulations 2002 (COSHH) require employers to control the exposure of employees and others to hazardous substances by carrying out risk assessments, providing and maintaining control measures, monitoring exposure levels and providing training.

Arrangements within Pharmed UK

Workplace inspections will be carried out on a regular basis to identify areas where standards require improvement. These areas will be highlighted for immediate action. The condition of welfare facilities will be checked as part of these routine safety inspections.

The premises are designated "No Smoking".

Responsibilities

All persons will ensure that their workplaces are maintained to a satisfactory standard of housekeeping at all times. This will ensure that walkways and floors are clear of obstacles and boxes or files are not allowed to accumulate on the floors around workstations.

Employees are responsible for keeping their work area tidy and reporting any housekeeping problems to their manager.

Although Pharmed UK employs cleaning operatives to assist with cleaning duties, it is the responsibility of everyone to keep all areas, particularly kitchen areas and washrooms clean and tidy. Any spillages should be reported or cleaned up as soon as possible.

Summary

Poor housekeeping is a common cause of accidents and fire in the workplace. There are three basic precautions for all persons to consider to help maintain good housekeeping standards:

- Ensure that articles and substances are returned to designated locations after use. In particular, the spaces around workstations are kept tidy.
- Ensure that waste materials are removed on a daily basis or as soon as possible.
- Always report any problems that cannot easily be rectified.

General Provisions

Temperature

Although no upper temperature limit is specified, indoor working temperatures should be “reasonable for the comfort of persons employed” (unless this is impractical because of hot or cold processes in which employees should only work for short periods).

The recommendation is for a minimum 16°C for environments where physical labour does not take place and 13°C for workplaces requiring strenuous effort.

Ventilation

Regulation 6 requires that effective and suitable measures be taken to ensure that enclosed workplaces are adequately ventilated and stale or hot air is replaced at a reasonable rate.

Ventilation includes both openable windows and mechanical systems, and the requirements include the avoidance of unpleasant smells or fumes.

Lighting

Regulation 8 requires that “lighting should be sufficient to enable people to work - so far as is reasonably practicable, by natural light”. Suitable and sufficient emergency lighting should be provided in any room where persons are exposed to danger in the event of failure of artificial light.

Workspace

Regulation 10 and the accompanying Approved Code of Practice suggests a minimum working space of 11 cubic metres, to a height of 3m, or around 2 x 2.3 metres of floor-space per person. Floor-space may be taken up by furniture etc. so there should be enough space to allow access or egress to and from workstations.

Hygiene

Employers provide suitable and sufficient washing facilities and sanitary conveniences, which must be adequately ventilated and lit. In addition, they must be kept in a clean and orderly condition with suitable drainage and flushing systems.

Separate facilities should be provided for men and women and special provisions made for any worker with a disability. Soap and towels (or similar) must be provided and hot water should be thermostatically controlled to prevent scalds.

Employee co-operation

The Company welcomes active participation and suggestions for improvements to the working environment. Such suggestions should be passed on through the relevant manager.

The most important considerations for all members of staff are:

- To consult with and to respect the wishes of colleagues with regard to noise, heat or lighting.
- To keep their own work area tidy so as not to encroach upon a colleague's working space.
- Employees must maintain good standards of personal hygiene in the workplace and make full and proper use of washing facilities.
- Employees should only use sanitary/washing facilities for their intended purpose (i.e. do not rinse out floor mops or wash crockery etc in wash hand basins).
- Any special requirements, defects or identified problems should be reported to a director or manager.
- Any water spillages or other slip hazards should be reported or cleared up immediately.

3.13 The Use of Vehicles

Legal Responsibilities

The Health and Safety at Work Act 1974 requires employers, as far as possible to ensure the health and safety of employees while at work. There is also a responsibility to ensure that others are not put at risk by work-related driving activities.

Arrangements within Pharmed UK

Only those employees who are allocated a company vehicle (and other designated members of their family) are authorised and insured to drive company vehicles.

A separate Car Policy gives full details of Company requirements in relation to vehicle use and a copy of this document is provided within the Company Induction Package.

Using a mobile phone (or other hand held device) whilst driving

It is illegal to use a hand held mobile phone whilst driving unless a hands-free set is in use in conjunction with the device. Drivers must not use a hand held phone or device to either receive or make a phone calls, send messages or text while driving, even in the case of a traffic jam or stopping at traffic lights, unless parked with the engine switched off. It is also an offence to use a phone or device even while it is in a cradle or if it is being operated via buttons if the driver cannot have proper control of the vehicle or has to take their eyes off the road.

Any driving offence committed by an employee whilst using a phone will result in the employee being subject to the Company's disciplinary procedure. The Company will not accept any liability for any employee, business associate or driver of a vehicle who in the course of carrying out business on Pharmed UK is found to be using a mobile phone or other device whilst driving.

Hands-free kit

Whilst using a hands-free device excludes you from immediate prosecution, drivers are still advised to keep conversations to a minimum and advise the other parties that they are driving in order to keep the conversation short.

Several studies have shown that mobile phone use whilst driving creates a distraction to the driver which may increase the likelihood of an accident. This distraction potential is not eliminated by the use of a hands-free phone. Hands-free phones have not been shown to be safer than hand held phones with respect to driver distraction. When using a phone while driving the driver needs to keep conversations short and resist any temptation to make notes or read documents.

If there is the necessity to call someone else, the driver must pull in somewhere legal and turn the engine off before attempting to make the call. Any mobile phone use at the time of an accident, whether hands-free or not, will result in prosecution, up to and including for death by dangerous driving and may result in imprisonment.

Recommendation

Where possible, drivers of company vehicles should make use of voicemail on their mobile phones whilst driving. Journeys should be planned to allow for a break every two hours, this break can be used to answer messages.

3.14 Workplace Transport

Legal Responsibilities

The Health and Safety at Work Act states that employers must ensure, so far as is reasonably practicable, the health and safety of all employees while at work. There are also specific guidelines around planning transport within a workplace. This includes management of site signage, traffic routes and any site specific instruction relating to the movement of vehicles and pedestrians within a work area.

Warehouses where there are movements of vehicles and pedestrians will have a traffic management system in place to segregate where possible and provide walkways, crossings etc. in area where vehicles operate

3.15 Health and Safety Training

Managers base the selection and recruitment of all employees on an appraisal of existing knowledge, skills and experience. Only those prospective employees considered to demonstrate the correct attitude to work are employed.

Following appointment, the manager arranges for induction training. This includes details relating to:

- fire safety
- accident recording and first aid
- hazard spotting and reporting procedures

Throughout employment, training needs may be identified by the management and/or individual employees. The appropriate training is provided, subject to approval by the directors.

Staff appointed as First Aiders, Fire Marshalls and similar will receive training to enable them to fulfil the role adequately.

Health and Safety training records are retained on Site in line with other training records.

3.16 Monitoring of Safety

It is recognised that it is the responsibility of every employee in the company to be aware of hazardous situations and to deal with them, if appropriate, without endangering themselves.

If hazards cannot be dealt with as above, the employee is to report the hazard to their line manager or appropriate director so that remedial action can be taken.

In addition, the company will audit on a periodic basis any safety systems and procedures in the company. The records of the external audits are kept by the person responsible for Quality.

Periodically, enforcement officers may visit the company. The General Manager will accompany the officer during the visit; or in their absence another manager will deal with the officer during the visit. The General Manager is responsible for co-ordinating the response to any matters raised by the visit. This may include the use of external specialists as necessary.

3.17 Information for and Consultation with Employees

The Health and Safety Rep will ensure that the appropriate Statutory Notices are displayed on notice boards throughout the premise.

Additional posters and notices relating to specific safety subjects appropriate to the location will be posted on company premises.

This Policy and related documents and forms are available to all staff via the shared drive on the Pharmed UK Intranet and on the Pharmed UK website.

Provision for feedback is made available via team meetings and any member of staff can contact the General Manager on a confidential basis.

Managers are available to staff and this provides an opportunity to discuss health and safety issues.

All employees are encouraged to speak with any member of management at any time about standards of Health and Safety at work.