

Health & Safety Policy

1 Policy Statement – What is Comms-care’s commitment to H&S

Comms-care Group Ltd places the highest priority on protecting the health, safety and wellbeing of its employees and others, as far as is reasonably practicable. The company therefore complies with the Health & Safety at Work etc. Act 1974 and all other relevant health and safety legislation to ensure that the company’s staff and premises are safe and healthy. The necessary supporting arrangements are built into the company’s Integrated Management System (IMS), which is subject to formally scheduled review (at predetermined intervals), plus audit and continuous improvement arrangements.

The company uses the following means to implement its legal and regulatory obligations:

- provide adequate control of the health and safety risks arising from our work activities;
- develop a culture supportive of health and safety in support of achieving control over risks;
- consult with our employees on matters affecting their health and safety;
- provide and maintain safe plant and equipment;
- ensure safe handling and use of substances;
- provide information, instruction and supervision for employees;
- ensure all employees are competent to do their tasks, and to give them adequate training;
- reinforce to employees the importance of meeting their responsibilities and co-operating with the company to achieve a safe working environment;
- prevent accidents and cases of work-related ill health;
- maintain safe and healthy working conditions; and
- review and revise this policy as necessary at regular, scheduled intervals.

Within the context of Comms-care’s operational basis, which is an office environment at Company HQ with staff working on-site at customer, supplier and group company locations (on-site workers), and the company recognises that failings in management controls, rather than individual themselves, may be the cause of incidents. Health and Safety risks are therefore subject to the company’s risk assessment and management approach, with risks being able to be logged and managed. However, where an individual is found to have infringed the law, wilfully neglected safety precautions or overlooked a potential hazard, disciplinary action may result.

Simon Day – Services Director

Date: 18/02/20

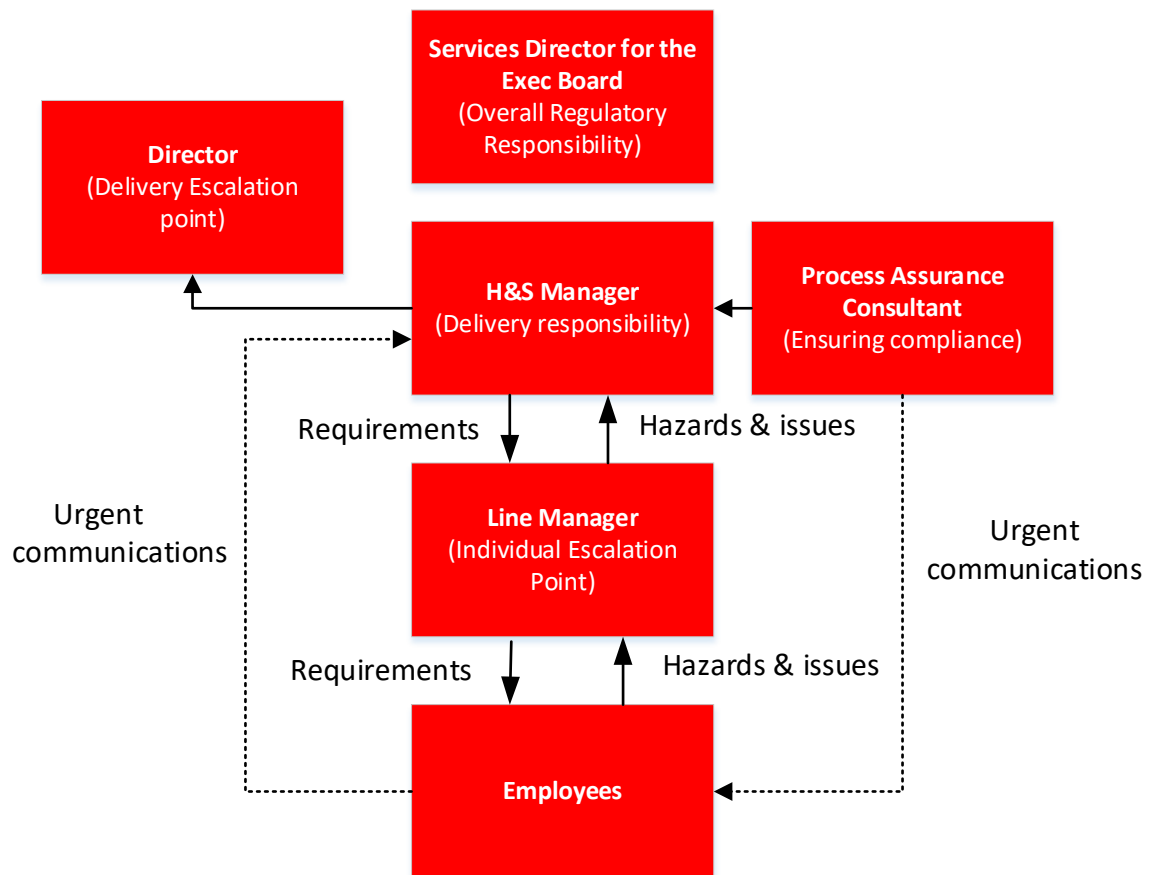
Next Review: February 2021

2 Organisation and Responsibilities - Who has to do what (including all employees)

Comms-care's Health and Safety structure is depicted in the diagram below.

It recognises that although overall accountability for health and safety lies with the Services Director on behalf of the Executive Board, everyone in the company must take responsibility for their own health and safety at work, as well as for that of others. The structure therefore provides the necessary communication and escalation routes to enable them to report accidents, near misses and potential hazards, as well as first symptoms of ill health. The structure also provides the downward communication means to communicate to employees about their responsibilities and the company's health and safety arrangements. The Services Director is supported by the H&S Manager who acts as the H&S competent person for the company.

High Level Safety Management Structure



2.1 Specific Responsibilities

2.1.1 The Services Director (on behalf of the Executive Board)

Has overall responsibility for Health and Safety and specifically for:

- Ensuring suitable financial provision is made for health and safety obligations.
- Ensuring work is planned to take into account health and safety issues.
- Understanding the company policy for health and safety and ensuring it is readily available for employees.
- Setting a personal example by visibly abiding by and promoting the company's H&S Policy
- Actively promoting at all levels the Company's commitment to effective health and safety management.

2.1.2 The H&S Manager

Has the operational responsibility and is the competent person for H&S arrangements and safeguards, and the maintenance of a safe and healthy workplace and the necessary welfare facilities, and specifically for:

- Providing appropriate information and instruction to employees.
- Ensuring that all staff receive appropriate training and/or that the need for such training is communicated to the relevant managers
- Assessing and monitoring risks to health and safety.
- Monitoring the implementation of the health and safety policy throughout the company and reviewing its appropriateness by regular safety audits/inspections (conducted by Process Assurance)
- Investigating potential hazards, accidents and implementing corrective action.
- Reviewing health and safety legislation and implementing any new requirements pertaining to the company's undertaking.
- Liaising with managers, employees, sub-contractors, customers and specialists as and when appropriate.
- Collating and reporting any accidents reportable under the Reporting Guidelines

2.1.3 All employees

All employees have a legal duty for health and safety at work. They are required to:

- Work safely, using the correct equipment (including any Personal Protective Equipment (PPE)) for the job and following all relevant training and instructions
- Read, understand and comply with the Company's Health & Safety Policy
- Co-operate with supervisors and managers on health and safety matters and any incident investigations;
- Not interfere with anything provided to safeguard their health and safety;

- Take reasonable care of their own health and safety and of others who could be affected by what they do; and
- Report all health and safety concerns to an appropriate person (usually their line manager, H&S forum representative or to the H&S Manager), where “concerns” includes defects to equipment, incidents which could have led to injury or damage (even if that didn’t occur (i.e. a “near miss”)) or actual accidents

2.1.4 Consulting with staff

The company recognises its obligations under the Safety Representatives and Safety Committees Regulations 1977 and the Health and Safety (Consultation with Employees) Regulations 1996. Comms-care has a proven communications track record which includes the use of emails and general internal news updates. Two way communication/or feedback from staff is provided by the quarterly Health & Safety Forum and information is then cascaded down to all employees.

Arrangements – How we meet our commitments to H&S

There is a mixture of Health and Safety legislation to which Comms-care has to abide and a variety of internal arrangements which the company uses to meet its legal requirements (and to enable employees to meet theirs). These various arrangements are outlined below.

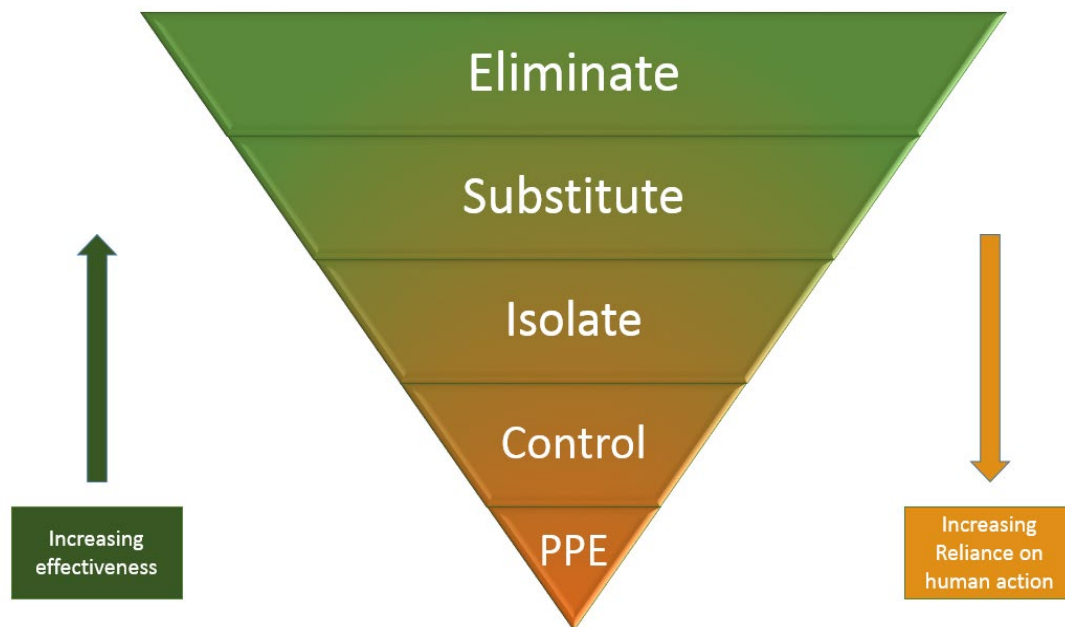
2.2 Risk Assessment

Risk Assessments are used to determine what could go wrong (“hazards”), before the event, and to put in place a control to stop it happening before someone is hurt. Examples of possible hazards include causes of trips and falls, manual handling, working at height and workplace transport. A risk therefore, is the chance or likelihood that a hazard will cause harm.

All employees are required to report any hazards to their line manager, H&S Manager or HR. The Company is responsible for ensuring that H&S risk assessments (both proactive and reactive) are conducted and acted on. All risk assessments are conducted such that they are both suitable and sufficient. The higher level corporate on-going risks are recorded in the company risk register (using the Risk Control Hierarchy Method described therein and summarised in the diagram below), ensuring that appropriate control measures are put in place and for on-going monitoring. As part of the company’s standing operational procedures, a Method Statement, supported by a Risk Assessment, detailing the work and controls surrounding the installation of new or replacement IT equipment in a standard comms-room or office environment is in place. On-site workers additionally perform risk assessments for work they are conducting on site for risks not covered by the routine Method Statement and are at all times required to maintain vigilance.

The diagram below summaries the Risk Control Hierarchy adopted; we apply the highest level of control where practicable and commensurate with the risk level. Lower levels controls may be used in the interim until long-term control are implemented. All identified risks are properly examined and

resolved in a reasonably practicable way, taking into consideration the cost of the various control options available versus the risk.



2.3 Training

For health and safety in Comms-care this starts from day one with induction where staff are appraised of all health and safety arrangements and documentation (e.g. this Policy). As part of induction (and on a refresher basis) staff are required to complete on-line training (including scored tests) covering manual handling, DSE, fire awareness, ladder training and slips, trips and falls, other training is available as required. Facilities maintain on-line access to these training records.

Staff are then trained on-the-job (or via more formal training as appropriate) and also when they change role or have to use new equipment with an associate actual or potential hazard. Should PPE be required, full training is given.

The Company maintains “a watch” regarding legislative changes and industry best practice via a 3rd Party. Required updates are communicated as necessary and captured in the Register of Health & Safety Legislation and Other Requirements.

2.4 Fire and Emergencies

Fire drills and fire alarm bell tests take place routinely at Company HQ; with drills formally planned and recorded with lessons learned. All safety equipment is in place in the Company buildings and is regularly checked and fire notices giving instructions are sited at exit doors. Fire Wardens & Marshalls are appointed and trained.

However preventative measures are key to ensure that none of the above measures have to be carried out for real. Therefore staff are required to conduct themselves so as to minimise the risk of fire and are required to observe the company smoking policy (including using the smoking area and ensuring that cigarette ends are safely disposed of in the bins provided).

Managers are required to keep their areas safe from risk of fire at all times (including segregating flammable materials).

For fires and other emergencies/significant incidents, the Emergency Incident Procedure is invoked and an incident manager appointed.

2.5 First Aid

First aid boxes and posters describing what to do in the event of certain key injuries are displayed in company premises. Trained first aiders at work are also in post and their names are also displayed. There is a defibrillator at Company HQ with trained personnel should its use be required.

2.6 Accident reporting and investigation

1. All accidents MUST be reported to either HR, H&S Manager or the employee's line manager and the details recorded in the accident book & Company H&S Log. Where an accident occurs on a customer's site, On-site workers are required to coordinate with their host to ensure the accident is reported in the customer's accident book. Either HR, H&S Manager or the line manager is still informed and details are recorded in Comms-care's accident book and H&S log if required.
2. Near Misses should be reported to Line Manager's and may be logged on the Company H & S Log.

Serious accidents where hospital treatment is required must be reported to HR and the H&S Manager as well as the line manager as soon as possible after the incident.

In line with the following advice <http://www.hse.gov.uk/riddor/reportable-incident.htm> the Company complies with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 1995 by reporting the following:

- Deaths
- Major injuries e.g. fractures (other than fingers, thumbs and toes), amputations, loss of sight, crush injuries, serious burns, scalping, loss of consciousness, hypothermia or heat induced illness
- Injuries which have caused over seven day's incapacitation (not counting the day on which the accident happened)

The H&S Manager is responsible for forwarding notification to the enforcing authorities via:

- The web at <http://www.hse.gov.uk/riddor/report.htm> OR
- Telephone 0345 300 9923 (opening hours Monday to Friday 8.30 am to 5 pm).

3. The H&S Manager (supported by the Process Assurance Consultant as appropriate) is responsible for investigating the causes of an accident in order to:

- determine the cause(s) with a view to preventing a recurrence
- gather information for use in any criminal or civil proceedings
- confirm or refute a claim for industrial injury benefit
- prepare notification to be made to the Health and Safety Executive

With the objective of answering the following questions:

- WHAT caused the accident?
- WHO was involved?
- WHEN did it occur?
- WHY did it occur?
- HOW could it have been prevented?
- HOW can a recurrence be prevented?

2.7 Work Equipment & PPE

1. The company has an In Service Inspection & Testing Procedure (ISIT) which sets out the company's approach to the testing of electrical equipment and the applicable legislation.
2. Equipment is only used for the purpose for which it was designed and is checked as appropriate prior to use. Any equipment which could cause harm is not used until training has been given/proved and employees are required to operate all equipment in accordance with the given directions/instructions and all relevant safety equipment including PPE and guards etc. built into equipment. Comms-care is committed to maintaining all equipment in a safe and serviceable condition with records kept and additionally staff are required to report any faults or damage with equipment.
3. Fixed electrical wiring tests are scheduled for completion every 5 years.
4. Personal Protective Equipment (PPE): this is issued free of charge where required and training given in its use. When issued, PPE must be used and any problems with it reported to the line manager.

2.8 Substances Hazardous to Health (COSHH)

The Company holds a COSHH register for all hazardous chemicals used by the business. COSHH documentation is also provided by 3rd parties such as the HQ cleaning contractor with regard to the chemicals they store and use on site. Should any On-site workers working on a customer's site come into unprotected contact with a substance which could be hazardous to health, the customer host, the line manager, H&S manager and HR are to be notified immediately.

2.9 Asbestos Management

The Company operates from a new-build location where asbestos has not been used. Should any On-site workers working on a customer's site believe that they have come into contact with asbestos, the customer host, the line manager, H&S manager and HR are to be notified immediately and work halted until a safe system of work has been agreed. On-site workers undergo Asbestos training where required.

2.10 Manual Handling

Although the company seeks to eliminate the need for manual handling wherever possible, everyone in the company undertakes manual handling training on joining the company. In accordance with the training provided, everyone has a role in reducing any remaining needs for manual handling by:

- Reducing weights
- Reducing the frequency of manual handling
- The use of additional manpower
- Through the provision of suitable equipment to assist in the operation
- That the selection of appropriate persons to carry out manual handling or lifting tasks will be based on the training given, age, physique etc.

2.11 Welfare Provision

The company headquarters are fully provisioned with welfare facilities such as male and female toilets, disabled toilets, drinks and food heating facilities, rest areas and shower. The company also takes into consideration the requirements of the Working Time Directive as it relates, for example, to On-site workers driving to and from customer sites.

2.12 Working on Site (Customer requirements)

When working On-site the Comms-care employee is required to co-operate with their host and attend any such on-site induction. Where no such information is given, On-site workers are required to take a common sense approach with regard to their own safety, by familiarising themselves with local arrangements e.g. emergency exits, high risk areas to avoid, emergency alarm sounds and so on.

2.13 Monitoring, Audit, Review and Improvement

As this H&S Policy forms part of the Comms-care's Integrated Management System (IMS), it is subject to the same formal review, audit and improvement arrangements as is the rest of the IMS. These arrangements are generally certified to ISO9001 (and support other formal ISO certifications that have similar requirements, namely ISO20000, ISO27001, ISO22301 and ISO14001). The systematic formal review/audit of the Policy is scheduled into the company's Master Audit Schedule and this is usually undertaken as a joint venture between the H&S Manager and Process Assurance. The Policy is also subject to review under the annual Management Review of the IMS. As business requirements or legislation changes, the H&S Policy and associated arrangements are additionally reviewed.