

Plastica Ltd

The Major Accident Prevention Policy (MAPP)

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Contents

Section	Content	Page Number
1.0	Introduction, Scope and Objectives	3
2.0	Statement of General Policy	4
3.0	MAPP Organisation Chart	5
4.0 4.1	MAPP Responsibilities Directors with specific responsibilities for Health, Safety, Fire and Environmental Issues (MD HSFE, ICTD HSFE and BDD HSFE)	6 6
4.2	HR Officer with special responsibilities for Health, Safety, Fire and Environmental Issues (HR HSFE)	6
4.3	MAPP Team	7
4.4	All Other Employees	7
5.0	Health, Safety and Environmental Arrangements within the scope of the MAPP	7
5.1	MAPP Elimination of Hazard	7
5.2	Identification of Risk	8
5.3	Organisational Control	8
5.4	Management Change	9
5.5	Responsibility Towards Employees Training	9
5.6	Responsibility Towards Contractors, Visitors and Third Parties	9
5.7	Emergency Planning	10
5.8	Monitoring and Auditing	11
5.9	Review	11
5.10	Future Actions	11
Appendix A	Risk Factors	12
Appendix B	Inspection Schedules	14
Appendix C	Control Measures to Control risk of an accident or incident	18
Appendix D	Induction Process	19

2

1.0 Introduction

Plastica Ltd is based in St Leonards on Sea and is a supplier of swimming pool and hot tub equipment and water treatment chemicals. Under the terms of the Control of Major Accident Hazards Regulations (as amended) 2015 (COMAH) Plastica has been classified as a "Lower Tier" operation. This classification has been made for the following reasons:

- Plastica Ltd could handle a quantity of chemicals that could come under Schedule 1
 Part 2 of COMAH regulations.
- 2. Some of the chemicals that Plastica Limited handle have a risk category that comes under Schedule 1, Part 3, Sections 8, 9 and 10 of the COMAH regulations.
- 3. Based on the above, Flammability and Environmental categories have been exceeded making us Lower Tier.

Under COMAH regulations 2, 3, 4, 5, 6, 7, 10, 11, 15, 16, 18 and 26 apply. Lower Tier operations require that a Major Accident Prevention Policy (MAPP) is produced to prevent any major accidents/incidents occurring or if an incident occurs to have procedures in place to mitigate the effects. The 2015 COMAH regulations request a HAZID exercise is undertaken (see Appendix A), this will be reviewed every three years or in the event of a significant incident, a significant change to the business or processes or change of legislation (as outlined in H&S 13 Change Management Procedure).

This document is the MAPP for Plastica Limited and is specifically aimed at major hazard identification and control. Other hazards are considered in the Company's full Safety Management System (SMS)

Scope

The scope of this document extends only to those accidents and incidents which relate to the handling, storage, batching and distribution of water treatment products. These products form part of the Lower Tier inventory.

The other health and safety management of Plastica Limited's activities is controlled by the overall Safety Management System (SMS). This management system is contained in other documentation. Where relevant the MAPP makes reference to the SMS.

The Plastica Limited SMS follows the guidance given in the HSE document Managing for Health and Safety (HSG65), BS OHSAS 18001:2007 and COMAH (as amended) 2015.

The MAPP is regarded as a standalone document but is also used as a supplement to Managing for Health and Safety (HSG65).

Objectives

The primary objective of this MAPP is to prevent a major accident or incident occurring, or in the event of a major accident or incident the aftermath can be controlled so that it does not present further risk either internally or externally from this site. This is achieved through the implementation of this Policy and accompanying documentation.

2.0 Statement of General Policy

Plastica Limited is aware of its responsibilities under the terms of the COMAH Regulations (as amended) 2015 taking all measures necessary to prevent major accidents and to limit their consequences for human health and the environment, in line with Regulation 5. We will achieve these aims by:

- 1. Maintaining an effective and efficient health and safety policy and environmental management system (SMS) and (EMS) which will be reviewed by Health & Safety Representatives on an annual basis.
- 2. Identify, evaluate and control the accident hazard.
- 3. Ensure that adequate resources are made available to achieve the aims of this Policy
- 4. Manage risks to health and safety and the environment through a process of elimination, as low as reasonably practicable (ALARP), sufficient and sustainable risk assessments and risk control.
- 5. Ensuring we comply with current, relevant health and safety and environmental legislation and their Approved Codes of Practice (ACoP) and guidance notes.
- 6. Recognising that our employees are a key resource in implementing this Policy and ensuring that adequate training is provided to allow employees to understand their responsibility.
- 7. Ensuring safe and effective systems of work are provided.
- 8. Ensuring safe, well maintained plant and equipment including PPE.
- 9. Ensuring that any accidents or incidents, as well as near misses and dangerous occurrences that could have led to an accident are reported (where applicable), fully investigated and that any corrective actions are implemented.
- 10. Encouraging employee involvement in the key aspects of the development and implementation of the MAPP.
- 11. Ensuring that there is effective communication between those involved in the MAPP.
- 12. Strive for continual improvement of our performance through the establishment and monitoring of accidents and incidents, comparing actual performance against targets, implementing regular inspections (see Appendix B) and auditing processes on a routine basis. Regularly monitored by Health & Safety Representatives.
- 13. Demonstrate that we have taken all measures necessary as specified in the Regulations and provide resources to HSE as and when required

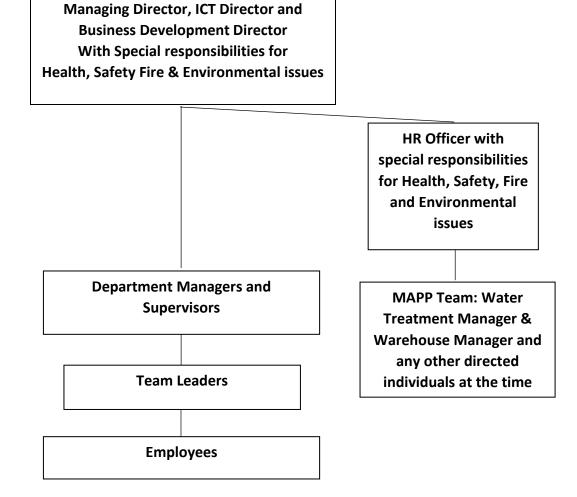
Signed

Date: October 2024

Managing Director with specific responsibilities for Health, Safety, Fire and Environmental issues (MD HSFE).

3.0 MAPP Organisation Chart

5



4.0 MAPP Responsibilities

This section outlines the responsibilities of those employees who have specific duties allocated to them within the MAPP. These are over and above their day to day health and safety and environmental responsibilities.

All employees have responsibilities as part of the MAPP. This is outlined in the Company's Health and Safety Policy. Information is provided to all new employees as part of their induction and is signed for by the employee to show they have understood their responsibilities. A record of this is kept by the HR Department.

The responsibilities within the MAPP are allocated according to the following organisational tasks:

4.1 Managing Director (MD HSFE), ICT Director (ICT HSFE), Business Development Director (BDD HSFE) with Special Responsibilities for Health, Safety, Fire and Environmental Issues

- a) Plan, develop and implement a substantial and sufficient Major Accident Prevention Plan
- b) Ensure that Plastica Ltd adheres to current health and safety and environmental legislation with respect to the MAPP
- c) Instruct the relevant members of the team on their specific duties and responsibilities with regards to the MAPP and COMAH
- d) Liaise with HSE, Environmental Agency and Local Authorities as and when required
- e) Ensure the MAPP is fully resourced in terms of time, personnel and finances
- f) Routinely monitor the implementation and the effectiveness of the MAPP
- g) Routinely report findings to the main board, shareholders and management team
- h) Ensure the members of the MAPP team are adequately trained to perform their duties
- i) Ensure that any/all COMAH related incidents and accidents are fully investigated
- j) Ensure all employees and contractors are aware that Plastica Ltd is a COMAH site and that as part of their induction they are issued with an explanatory document.
- k) Arrange staff consultation when necessary and appropriate
- I) Set a personal example with regard to the implementation of the MAPP
- m) Carry out regular routine audits and inspections
- n) Manage the day to day running of the MAPP and COMAH processes
- o) Must hold a level 3 Health and Safety qualification

4.2 The HR Officer with Special responsibilities for Health, Safety, Fire and Environmental Issues (HR HSFE)

- a) Assist the MD HSFE, ICT HSFE and BDD HSFE with MAPP and COMAH related issues
- b) Assist the MD HSFE, ICT HSFE and BDD HSFE to ensure that Plastica Ltd adheres to current health and safety and environmental legislation with respect to the MAPP
- c) Work in conjunction with the MAPP Team when required
- d) Assist with carrying out routine audits and inspections and present the findings to the relevant Director
- e) Assist with managing the day to day running of the MAPP and COMAH processes
- f) Work with the MD HSFE, ICT HSFE and BDD HSFE to ensure adequate training has been given and ensure it is up to date

- g) Assist in the investigation of COMAH related incidents and accidents
- h) Set a personal example with regard to the implementation of the MAPP and COMAH

4.3 MAPP Team (includes Water Treatment Manager and Warehouse Manager)

- a) Ensure that Plastica Ltd adheres to current health and safety and environmental legislation with respect to the MAPP
- b) Instruct the relevant members of the team on their specific duties and responsibilities with regards to the MAPP and COMAH
- c) Assist with monitoring that the procedures are implemented and adhered to
- d) Liaise with HSE, Environmental Agency and Local Authorities as and when required
- e) Ensure all staff members are trained as per the requirement of the MAPP team
- f) Ensure that COMAH incidents and accidents are reported through the correct procedure
- g) Assist with the investigation of any/all COMAH related incidents and accidents
- h) Ensure all employees and contractors are aware that Plastica Ltd is a COMAH site and that as part of their induction they are issued with an explanatory document.
- i) Set a personal example with regard to the implementation of the MAPP
- j) Manage the day to day running of the MAPP and COMAH processes as directed by the MAPP team
- k) Assist with the design, implementation and review of safety related policies with regard to the MAPP and COMAH

4.4 All Other Employees

- a) Adhere to the organisation's MAPP
- b) Carry out their duties in a safe manner in accordance with the Organisation's MAPP, procedures and safe working practices
- c) To be alert to hazards in the workplace and report all defects to their Line Manager/Supervisor and to make suggestions for safer working procedures
- d) Commit themselves to training in order to ensure that they are competent to perform their role
- e) Co-operate with all members of the company to ensure the aims and statutory duties are fulfilled
- f) Ensure that COMAH incidents and accidents are reported through the correct procedure
- g) Carry out their work activities in a safe manner with due regard for themselves and those working around them

5.0 Health, Safety and Environmental Arrangements within the scope of this MAPP

In order to effectively manage the risk, the organisation has followed Regulation 4 (Principles of Prevention) of the Management of Health and Safety at Work Regs 1999.

5.1 MAPP Elimination of Hazard

7

Plastica Ltd has attempted to eliminate the risk, as low as reasonably practicable (ALARP). To this end the Company buys many of its water treatment products prepacked. This eliminates the risk of cross contamination of products which in turn may lead to an explosion.

This also eliminates the employee's exposure to harmful dust and the potential of harm to the environment due to spillage during the decanting process.

5.2 Identification of Risk

Plastica Ltd has made an extensive study of the inherent risk with the water treatment products covered by the COMAH regulations. A hazard identification exercise (HAZID) was conducted in 2024 (Appendix A), previous meetings have been on:

- November 2016 HAZID Identification Meeting
- February 2020 HAZID Identification Meeting
- October 2021 Review Meeting
- May 2024 HAZID Identification Meeting

and will be reviewed on a regular basis. The study was undertaken by a number of managers and employees within the organisation who identified of all the potential risks to the site.

Many of these risks were deemed to be unlikely and were discounted accordingly, leaving a smaller group of risks which were considered by the team to be possible. Further details can be found in Appendix A.

In addition, specific COSHH risk assessments have been produced by a competent party and these are used in conjunction with the manufacturers data sheets. A complete review of these documents will be completed in 2024.

We undertook a fire risk audit using an external contractor in 2016, this will be fully reviewed on a regular basis. Fire risk audits will now be undertaken annually or in the event of a significant incident, a significant change to the business or processes or change of legislation.

Fire risk assessments have been written and are reviewed annually as per our risk assessment procedure.

5.3 Organisational Control

Having identified the risks Plastica has developed a series of control measures to mitigate the risk of an incident or accident. (See Appendix C for further details).

Water Treatment packing is performed in a building set aside from the main site at Perimeter House and in a separate building ½ mile away (Unit 82).

The employees involved in the work are predominantly specific to that area of the business and have been thoroughly trained in the potential hazards. They have refresher training as and when required.

The Water Treatment products are stored separately in the main Warehouse as per HSG65.

Where decanting of product takes place, equipment is thoroughly cleaned before changing batches to prevent contamination.

Spill kits are readily available in these areas and in the main yard where loading/unloading takes place. In 2019 we continued with our mock spills and based on these findings we implemented a dedicated Spill Team. We conducted a mock spill with our ADR carrier in 2019.

Plastica has 4 Fire Officers and 13 Fire Wardens who are trained and tasked with ensuring that the risk of fire is kept to a minimum.

The site is inspected on a regular basis to ensure that risks are identified and dealt with in a timely manner. These inspections are listed in Appendix B (Monthly Walk Throughs).

5.4 Management of Change

Plastica has a Change Management Policy (HS&E 13) which deals with all significant change within the business to control or minimise the risk of a major accident, hazard or environmental damage as low as reasonably practicable.

Plastica has a Change Procedure (HS&E14) where all changes, whether organisational, plant processes, materials, equipment, procedures and other external circumstances are addressed. This is completed via a dedicated email address that is reviewed by the Health & Safety Committee (changes@plasticapools.net).

5.5 Responsibility towards Employees training

Plastica has identified and accepted its responsibilities to its employees to this end it ensures the following.

All employees involved in handling water treatment products undergo refresher training by our external DGSA as and when required.

All new employees go through an induction and basic training.

All training records are held on My Compliance and these are reviewed annually as part of the DGSA audit.

All employees working with water treatment products are provided with the correct PPE and this PPE is maintained and replaced when necessary. It is a mandatory requirement that PPE is used when appropriate and that the employees are fully conversant with the PPE they are required to use. Failure or refusal to use PPE may lead to disciplinary actions being taken.

We hold regular one to ones with our staff to identify any training needs.

Learning from mistakes

Training needs are identified from the Health & Safety Dashboard showing leading and lagging tasks.

Training needs are identified from auditing and sampling.

Training needs are identified through discussion at quarterly Health & Safety Meeting.

5.6 Responsibility towards Contractors, Visitors and Third Parties

Plastica accepts it has a responsibility to contractors, visitors and third parties and recognises the societal expectations under Section 3 of the 1974 Health & Safety at Work Act. As a result, the organisation has following controls in place:

All visitors to the site are informed that we are a COMAH site, there are information leaflets available at Reception.

Contractors pose a potential risk to Plastica. Therefore, we undergo a careful selection process before engaging with a contractor which involves gathering information on them, Risk Assessments and Method Statements are mandatory.

In addition, we may also ask for any of the following:

- Their Health and Safety Policy
- Reference sites
- Professional qualifications
- Details of incidents/accidents

All contractors are asked to sign in and we undertake an induction process with them before they start work including a list of site rules. Any work to be carried out in one of the areas concerned with COMAH is supervised by a competent member of Plastica staff. Plastica operates a permit to work scheme where relevant.

At the end of a task a contractor's performance is reviewed and documented for future reference.

Plastica Ltd have notified its neighbours that we are a COMAH site and we have worked with the local authority and East Sussex Fire and Rescue Service (ESFRS) to develop both an onsite and offsite plan. We held an Emergency Fire Drill in conjunction with ESFRS, East Sussex County Council and Competent Authority, in July 2017, the next one is due in 2022 if circumstances allow.

Plastica have complied with relevant regulations on public notification on the HSE COMAH website. This information will be kept up to date and reviewed every three years. Last date of review 2019.

5.7 Emergency Planning

As a lower tier COMAH site an onsite plan emergency plan has been prepared covering Major Accident Scenarios that the Company has identified.

The onsite Emergency Plan details the following:

- The hazards that trigger the activation of the plan
- The key roles and responsibilities for implementing the plan
- The practical requirements for dealing with the events

- Contact and liaison arrangements with the emergency services during the event
- The step-down criteria
- The all clear criteria
- Training and testing requirements for the plan (full test every 5 years). We held an Emergency Fire Drill in conjunction with ESFRS, East Sussex County Council and Competent Authority in July 2017. We held an exercise in July 2024 to test the boom with the ESFRS.

The current plan has been reviewed in 2024, the next one is due in 2029 if circumstances allow.

We have tested our water retaining barrier in:

- September 2019;
- September 2021;
- April 2023
- July 2024 with ESFRS

a copy of our findings is stored with the hard copy MAPP.

We have also been provided with an offsite emergency plan by the local council and copies have been circulated to the relevant interested bodies.

Plastica ensure contractors and temporary workforce are aware of their role in emergency procedure or situation (See Appendix D for further details).

5.8 Monitoring and Auditing

All MAPP related health, safety and environmental information, including risk assessments is audited according to a pre-arranged, agreed audit programme. This is co-ordinated by the MD HSFE, ICT HSFE and BDD HSFE and assisted by the HR HSFE.

In addition, the Health and Safety Management process is reviewed by the MD HSFE, ICT HSFE and BDD HSFE and assisted by HR HSFE.

The findings of all these reviews are discussed at both the quarterly Health and Safety Meetings and the Board Meetings, along with near any near misses and accidents reports.

(See Appendix B for further details)

5.9 Review

The MAPP will be reviewed every 12 months or when any work activity or site changes, whichever is the soonest. A note of all reviews is recorded.

5.10 Future Actions

- Create HS&E Sampling
- Create HS&E Questionnaires

Appendix ARisk Factors

Last reviewed 22nd May 2024

FIRE	Risk Level
Smoking (limited locations)	Medium
FLT chargers close to chemicals – day time	Medium
charging, fire boards in place	
Battery charging	Low
Free standing heaters (many have been	Low to Medium
removed and replaced with wall heaters.)	
Hot works – finish 30 minutes before end of	Low to Medium
shift	
Skips – friction	Medium
Gas pipe in Engineering	Low
Other chemicals, paints, solvents	Low
Electrical Wiring – 3 year fixed wiring checks	Low
Overheating machinery	Low
Random wires hanging down	Low
Gas bottles – mishandling	Low
Arson	Low
Vehicle Accidents on Site	Low
Fumes (flammable)	Low
Dust extraction	Low
Spa Truck in WHS overnight (Diesel)	Low

SPILLAGE	Risk Level
Material spillage (ABS, oil, liquids, hazardous)	Medium to High
Vehicle Accidents on site	Medium to High
Vehicle arriving with spillages	Low
Leaking pallet trucks/FLTs	Medium to High
Unstable/broken pallets	Medium
Rubbish skips when emptying	Medium
Racking collapse/timber stack collapse	Low
Toilets – Water/Other	Low
Mains water pipes hit/burst	Low
Tea/coffee/water – drinks machines	Low
Losing load from FLT	Low to Medium
Diesel storage (bunded)	Low
Coolants	Low
Unit 82 – liquid packing	Low
Vehicles parked in WHS overnight	Low
Adverse weather	Low

FLOOD	Risk Level
Air Con Failure	Low
Down pipes blocked and broken	Medium
Gully full and blocked	Medium
Leaking roof	Medium

Adverse Weather	Low
Mains water/tanks hit/burst	Low
Fire Brigade (in event of fire)	Low
Test Tanks failure	Low

TOXIC GAS RELEASE	Risk Level
Racking collapse	Low
Chemical mix	Low
Leaking gas bottles	Low
Welding	Low
Purging Moulding machines	Low
Battery charging	Low

Appendix B

Inspection Schedules

Schedule of Monthly Walk Throughs

MONTH	DEPARTMENT
JANUARY	Offices, Kitchen, Toilets, Reception, Office Stairwell, Board Room, Meeting
	Room, Comms Room, Liners and Covers
FEBRUARY	Engineering, Canteen, Boiler Room, Toilets, Stairwells, Pump Room and
	Water Treatment
MARCH	Moulding, Timber Products, Warehouse/Goods In, Main Yard, Lower Car
	Park and Driveway, Goods In Yard and Top Car Park
APRIL	Offices, Kitchen, Toilets, Reception, Office Stairwell, Board Room, Meeting
	Room, Comms Room, Liners and Covers
MAY	Engineering, Canteen, Boiler Room, Toilets, Stairwells, Pump Room and
	Water Treatment
JUNE	Moulding, Timber Products, Warehouse/Goods In, Main Yard, Lower Car
	Park and Driveway, Goods In Yard and Top Car Park
JULY	Offices, Kitchen, Toilets, Reception, Office Stairwell, Board Room, Meeting
	Room, Comms Room, Liners and Covers
AUGUST	Engineering, Canteen, Boiler Room, Toilets, Stairwells, Pump Room and
	Water Treatment
SEPTEMBER	Moulding, Timber Products, Warehouse/Goods In, Main Yard, Lower Car
	Park and Driveway, Goods In Yard and Top Car Park
OCTOBER	Offices, Kitchen, Toilets, Reception, Office Stairwell, Board Room, Meeting
	Room, Comms Room, Liners and Covers
NOVEMBER	Engineering, Canteen, Boiler Room, Toilets, Stairwells, Pump Room and
	Water Treatment
DECEMBER	Moulding, Timber Products, Warehouse/Goods In, Main Yard, Lower Car
	Park and Driveway, Goods In Yard and Top Car Park

Monthly Racking Inspection

Available on the Intranet – Health & Safety > Equipment Checks

H&S Monthly/Quarterly/Yearly checks

Available on the Intranet – Health & Safety > Permits, Forms, Checklists and Questionnaires

HSF 08 H&S Monthly General H&S Checklist

HSF 09 H&S 3 Monthly General H&S Checklist

HSF 10 H&S 6 Monthly General H&S Checklist

HSF 11 H&S Annual General H&S Checklist

HS&E Sampling

To be worked on in late 2024

HS&E Questionnaires

To be worked on in late 2024

Appendix C

Control Measures to mitigate the risk of an accident or incident

We will follow Regulation 4 of the 1999 Management of Health and Safety Regulations which are the nine principles of prevention:

1) Avoiding risks;

We are unable to avoid the risks;

2) Evaluating the risk which cannot be avoided;

We complete Risk Assessments, undertake our HAZID review and work with ESFRS, HSE, EA and DGSA;

3) Combating the risks at source;

Fire – fire wall in place, segregating incompatible products, ensuring electrical installations checked regularly, smoking facility away from the main building in one area, Hot Works Policy, fire monitoring equipment, fire proof cabinets in place where required, regular maintenance of machinery and heightened awareness of staff of the risk of fire Spillage – liquids are bunded, Spill Team, spill kits in place, staff training, spillage procedure, ability to bund the site in the event of a spillage and racking inspection to prevent collapse Flood – regular building and site maintenance

Toxic Gas Release – racking inspections to prevent collapse, staff training on Water Treatment products and segregating incompatible products.

4) Adapting the work to the individual, especially as regards the design of workplaces, the choice of work equipment and the choice of working and production methods, with a view, in particular, to alleviating monotonous work and work at a predetermined work-rate and to reducing their effect on health;

Information, instruction, training and supervision is provided.

5) Adapting to technical progress;

As and when required.

- 6) Replacing the dangerous by the non-dangerous or the less dangerous; Purchasing pre-packed product.
- 7) Developing a coherent overall prevention policy which covers technology, organisation of work, working conditions, social relationships and the influence of factors relating to the working environment;

Risk Assessments, Safe Systems of Work, regular maintenance, information, instruction, training and supervision is provided.

- 8) Giving collective protective measure priority over individual protective measures; Where relevant
- 9) Giving appropriate instructions to employees. Information, instruction, training and supervision. Risk Assessments, Safe Systems of Work.

Appendix D

Induction Processes

Contractor Induction Form:

Contractor Induction Form

This form must be completed on the first day of a Contractor's work		
Contractor's Name:		
Contractor's Company Name:		
INTRODUCTION - To be completed by the person responsible for the Contractor		
Company/department working hours Welfare (e.g. toilets, canteen etc.) Signing in and out procedures Familiarisation with working area and staff Pedestrian Safety Around Forklift Trucks Document to be read, signed and attached		
To be completed by the person responsible for the Contractor		
Signed: Date:		
FIRE PROCEDURES – To be completed by a Fire Officer		
COMAH Fire Evacuation Procedure Emergency Exits (in relevant working area) Assembly Point Fire Alarm Tests		
To be completed by a Fire Officer		
Signed: Date:		
ACCEPTANCE – To be completed by the Contractor(s)		
I have received the above induction and fully understand all the information I have been given I fully understand my responsibilities whilst on site for my health and safety and those around me I will comply with my Risk Assessment and Method Statement(s) I will inform the person responsible for me of any deviation to my Risk Assessment or Method Statement(s) I will immediately cease my work if I have any health and safety concerns and discuss these with the person responsible for me		
To be completed by the Contractor(s)		
Signed: Date:		

This form must be attached to the relevant Contractor Approval Form and returned to the Finance & Operations Director or Operations Manager for reference.

HSF02 (v2) 11/01/21

From Employees Induction Form:

FIRE PROCEDURES - FIRE OFFICER	
	Evacuation in event of COMAH fire Evacuation in event of non-COMAH fire Call Points (whole building) Fire Alarm Tests In and Out Board (Importance & Evacuation) Date:
received and understood by Employee Signed	Date
INTRODUCTION BY MANAGER/SUPERVISOR	- To be completed on first day
Hours of work and break/time keeping Emergency Exits/Welfare Fire Alarm -congregation point/in&out board Protective Clothing (Hi Viz & other applicable) Complete Competency Form COMAH Site Pedestrian Safety Around Forklift Trucks Doc. Covid Secure and Social Distancing Inst.	How to book Holiday (in hours) Holiday Commitments (pre booked) In and Out Board Tour of the Building/Intro to staff Sign and return Job Description Explain that if an FLT in use in Timber Products - DO NOT ENTER Show Health & Safety Policies on Intranet
Completed by Manager /Supervisor (signed):	Date: