



Plastica Ltd

Safety Management System

Creation Date: 01/10/2019

Reviewed On: 01/02/24

Version: 5

HS&E 10

Table of Contents

Section	Title	Page Number
1.0	Introduction	4
2.0	Scope	4
3.0	General Requirements	5
4.0	IMS Policy	5
4.1	Health and Safety Policy Statement	5
4.2	The Major Accident Prevention Policy (MAPP)	5
4.3	Lower Tier COMAH Site Emergency Plan	5
4.4	Personal Protective Equipment	6
4.5	Yard Policy	6
4.6	Lone Working Policy	6
4.7	Driving at Work Policy	6
4.8	Driver Handbook	7
4.9	Mental Health & Wellbeing Policy	7
4.10	Safety Management System	7
4.11	Environmental Policy	8
4.12	First Aid Policy	8
4.13	Change Management Policy	8
4.14	Change Procedure	8
4.15	Fire Evacuation Procedure	9
4.16	Fire Safety Policy	9
4.17	Fire Officer Handbook	9
4.18	Environmental Incident Investigation Policy and Procedure	9
5.0	Hazard Identification, Risk Assessment and Controls	10
5.1	General Risk Assessment	10
5.2	Display Screen Equipment Control Procedures	11
5.3	Manual Handling Risk Control Procedures	12
5.4	Control of Legionella Risks	13
5.5	Control of Stress Risks	15
5.6	Control of Substances Hazardous to Health	16
5.7	Noise	18
5.8	New and Expectant Mothers	19
5.9	Work at Height	20
6.0	Legal and Other Requirements	22
6.1	Legal and Other Requirements Procedure	22
7.0	Objectives and Programme(s)	23
8.0	Resources, Roles, Responsibility, Accountability and Authority	23
9.0	Competence, Training and Awareness	24
10.0	Communication and Consultation	24
11.0	Documentation	25

12.0	Control of Documents	25
13.0	Operations Control	26
13.1	Control of Electrical Risks	26
13.2	Control of Gas Risks	26
13.3	Young People and Work Experience Procedures	26
13.4	Control of Off Site Working	26
13.5	Control of Contractors and Visitors	27
13.6	Control of Driving For Work	27
13.7	Violence and Aggression	27
13.8	Lone Working Procedure	28
13.9	Permits to Work	28
13.10	Personal Protective Equipment	28
13.11	Control of Lifting Operations Including Forklift Truck's	28
13.12	Control of Non-Routine Activities	28
13.13	Use of Compressed Gas Cylinders	29
14.0	Emergency Preparedness and Response	29
14.1	First Aid Policy	29
14.2	Fire Safety Procedures	29
15.0	Performance Measurement and Monitoring	30
15.1	Performance Measurement and Monitoring Procedure	30
16.0	Evaluation of Compliance	30
16.1	Evaluation of Compliance Procedure	30
17.0	Incident Investigation	31
17.1	Investigation and Reporting of Incidents	31
18.0	Nonconformity, Corrective Action and Preventative Action	31
18.1	Nonconformity	31
18.2	Corrective Action	31
18.3	Preventative Action	31
19.0	Control of Records	31
19.1	Document and Record Control Procedure	31
20.0	Internal Audit	32
20.1	Audit Arrangements	32
21.0	Management Review	32
21.1	Management Review	32

1.0 Introduction

Plastica Ltd is a well-established manufacturer and distributor of swimming pool products. The Company operates from a 110,000 sq. ft. site (Perimeter House) and a 5,000 sq. ft site (Unit 82) based in St Leonards on Sea, East Sussex and employs approximately 70 people (plus seasonal staff).

Plastica has seven manufacturing cells, each of which has unique properties and OH&S requirements.

In addition, the company has a large distribution Warehouse and runs offsite teams for pool lining, servicing and installation.

Plastica also has offices on site which have their own OH&S requirements.

Plastica has offsite storage facilities.

2.0 Scope

This OH&S Management System relates to our Perimeter House and Unit 82 sites, our offsite storage and our offsite workers. Plastica is committed to the prevention of injury and ill health and to the continuous improvement of the Integrated Management System. Plastica commits to apply to all applicable Health, Safety and Environmental regulations including but not limited to: Health & Safety at Work Act (1974), Management of Health & Safety at Work Regulations (1999), Display Screen Equipment Regulations (2002), Working at Height Regulations (2005), COMAH Regulations (2015), COSHH Regulations (2002), LOLER (1998) and PUWER (1998).

The Perimeter House site is located in St Leonards on Sea:

Perimeter House
Napier Road
Castleham Industrial Estate
St Leonards on Sea
East Sussex
TN38 9NY

Plastica is a Lower Tier COMAH (Control of Major Accidents and Hazards) site due to its handling, packing and storage of swimming pool chemical products. Predominately chlorine and bromine based products which are oxidising chemicals in the event of a fire.

The Integrated Management System and its objectives will be reviewed on an annual basis (or if there is a material change within the structure and processes of the business) to ensure it remains relevant and appropriate to Plastica Ltd. It will be available to all staff on our Company Intranet and available in printed format on request.

Plastica is committed to ensuring health and safety best practice is communicated to our employees.

3.0 General Requirements

Plastica will establish, document, implement, maintain and continually improve an Integrated Management System in accordance with the requirements of the OHSAS Standard.

4.0 IMS Policy

4.1 Health and Safety Policy

See Document Number: HS&E 01 Health, Safety & Environmental Policy.

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Policy & Other Documents

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FHealth%20and%20Safety%20Policies>

This document is reviewed annually or if there is a material change within the structure and processes of the business. The Policy is available to all employees.

4.2 The Major Accident Prevention Policy (MAPP)

See Document Number: HS&E 02 The Major Accident Prevention Policy.

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Policy & Other Documents

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FHealth%20and%20Safety%20Policies>

This document is reviewed annually or if there is a material change within the structure and processes of the business. The Policy is available to all employees.

4.3 Lower Tier COMAH Site - Emergency Plan

See Document Number: HS&E 03 Lower Tier COMAH Site - Emergency Plan.

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Policy & Other Documents

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FHealth%20and%20Safety%20Policies>

This document is reviewed annually or if there is a material change within the structure and processes of the business. The Emergency Plan is available to all employees.

4.4 Personal Protective Equipment (PPE) Policy

See document Number: HS&E 04 Personal Protective Equipment (PPE) Policy.

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Policy & Other Documents

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FHealth%20and%20Safety%20Policies>

This document is reviewed annually or if there is a material change within the structure and processes of the business. The Policy is available to all employees.

4.5 Yard Policy

See Document Number: HS&E 05 Yard Policy

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Policy & Other Documents

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FHealth%20and%20Safety%20Policies>

This document is reviewed annually or if there is a material change within the structure and processes of the business. The Policy is available to all employees.

4.6 Lone Working Policy

See Document Number: HS&E 06 Lone Working Policy

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Policy & Other Documents

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FHealth%20and%20Safety%20Policies>

This document is reviewed annually or if there is a material change within the structure and processes of the business. The Policy is available to all employees.

4.7 Driving at Work Policy

See Document Number: HS&E 07 Driving at Work Policy

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Policy & Other Documents

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FHealth%20and%20Safety%20Policies>

This document is reviewed annually or if there is a material change within the structure and processes of the business. The Policy is available to all employees.

4.8 Driver Handbook

See Document Number: HS&E 08 Driver Handbook

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Policy & Other Documents

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FHealth%20and%20Safety%20Policies>

This document is reviewed annually or if there is a material change within the structure and processes of the business. The Handbook is available to all employees.

4.9 Mental Health & Wellbeing Policy

See Document Number: HS&E 09 Mental Health & Wellbeing Policy

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Policy & Other Documents

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FHealth%20and%20Safety%20Policies>

This document is reviewed annually or if there is a material change within the structure and processes of the business. The Policy is available to all employees.

4.10 Safety Management System

See Document Number: HS&E 10 Safety Management System

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Policy & Other Documents

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FHealth%20and%20Safety%20Policies>

This document is reviewed annually or if there is a material change within the structure and processes of the business. It is available to all employees.

4.11 Environmental Policy

See Document Number: HS&E 11 Environmental Policy

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Policy & Other Documents

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FHealth%20and%20Safety%20Policies>

This document is reviewed annually or if there is a material change within the structure and processes of the business. The Policy is available to all employees.

4.12 First Aid Policy

See Document Number: HS&E 12 First Aid Policy

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Policy & Other Documents

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FHealth%20and%20Safety%20Policies>

This document is reviewed annually or if there is a material change within the structure and processes of the business. The Policy is available to all employees.

4.13 Change Management Policy

See Document Number: HS&E 13 Change Management Policy

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Policy & Other Documents

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FHealth%20and%20Safety%20Policies>

This document is reviewed annually or if there is a material change within the structure and processes of the business. The Policy is available to all employees.

4.14 Change Procedure

See Document Number: HS&E 05 Yard Policy

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Policy & Other Documents

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FHealth%20and%20Safety%20Policies>

This document is reviewed annually or if there is a material change within the structure and processes of the business. The Procedure is available to all employees.

4.15 Fire Evacuation Procedure

See Document Number: HS&E 15 Fire Evacuation Procedure

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Policy & Other Documents

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FHealth%20and%20Safety%20Policies>

This document is reviewed annually or if there is a material change within the structure and processes of the business. The Procedure is available to all employees.

4.16 Fire Safety Policy

See Document Number: HS&E 16 Fire Safety Policy

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Policy & Other Documents

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FHealth%20and%20Safety%20Policies>

This document is reviewed annually or if there is a material change within the structure and processes of the business. The Policy is available to all employees.

4.17 Fire Officer Handbook

See Document Number: HS&E 19 Fire Officer Handbook.

This document is reviewed annually or if there is a material change within the structure and processes of the business. The Policy is available to all employees.

4.18 Environmental Incident Investigation Policy and Procedure

See Document Number: HS&E 20 Environmental Incident Investigation Policy and Procedure

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FHealth%20and%20Safety%20Policies>

This document is reviewed annually or if there is a material change within the structure and processes of the business. The Policy is available to all employees.

5.0 Hazard Identification, Risk Assessment and Controls

5.1 General Risk Assessment

5.1.1 Introduction

Plastica must make a suitable and sufficient assessment of the risks of our employees and non-employees. The assessment will be reviewed and amended as necessary and the assessment will be documented.

5.1.2 Scope

The assessments relate to our Perimeter House and Unit 82 sites, our offsite storage facilities, our offsite workers and our immediate neighbours and environment.

5.1.3 Legislation and Related Documents

Management of Health & Safety at Work Regulations (1999)
Health & Safety at Work Act (1974)
Display Screen Equipment Regulations (2002)
Working at Height Regulations (2005)
COMAH Regulations (2015)
COSHH Regulations (2002)
LOLER (1998)
PUWER (1998)

5.1.4 Procedure

The Finance & Operations Director with specific responsibilities for Health, Safety, Fire and Environmental Issues (FOD HSFE) and the HR Officer with specific responsibilities for Health, Safety, Fire and Environmental Issues (HR HSFE) shall ensure all departments have an up to date, suitable and sufficient risk assessment. They will work with a department supervisor/manager to undertake an assessment and ensure that it is kept up to date at all times.

A hazard is something which has the potential to do harm and can be broken down into five subsections; Physical, Chemical, Biological, Ergonomic and Psychological. These hazards will be identified on the risk assessment document and given a score as to the likely risk (L/M/H).

5.1.5 Responsibilities

The FOD HSFE – assessing the risks, ensure the documentation is completed, reviewed and updated as necessary, ensure all individuals receive new and revised copies as required.

The HR HSFE – assessing the risks, ensuring the documentation is completed and updated as necessary, ensuring all individuals receive new and revised copies as required.

Department Specialist – a nominated department specialist to assist with the identification and assessment of risk in their department.

5.1.6 Records

Each risk assessment will be given a document number and logged on our Risk Assessment Register.

Up to date risk assessments will be held on our Company Intranet.

5.1.7 Monitoring Requirements

Risk assessments will be reviewed on an annual basis and or if there is a material change in the department or processes.

5.1.8 Related Documents

Risk Assessment Schedule/Register

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Risk Assessments\Risk Assessments - New\Risk Assessment Register

Risk Assessment Forms

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Risk Assessments\Risk Assessments - New

Copies:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?newTargetListUrl=%2Fcompanyweb%2FHealth%20%20Safety&viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FRisk%20Assessments>

5.2 Display Screen Equipment Control Procedures

5.2.1 Introduction

Plastica shall make a suitable and sufficient assessment of the risks to our DSE users. The assessment will be reviewed and amended as necessary and the assessment will be documented.

5.2.2 Scope

The procedures relate to all staff that use DSE equipment on a regular basis.

5.2.3 Legislation and Related Documents

Display Screen Equipment Regulations (2002)
Health & Safety at Work Act (1974)

5.2.4 Procedure

All employees that use DSE equipment on a regular basis will be emailed a link to complete the Display Screen Equipment Assessment Checklist. The completed checklists are returned online to the HR Officer.

The HR Officer will review the responses and forward any requirements to the relevant manager.

The forms are also reviewed and signed by the individual's manager and note taken of any action required.

5.2.5 Responsibilities

HR Officer – to ensure the DSE Assessment Checklists are sent out annually, to collate the returns and ensure all responses are received.

Manager's – to take any action required from the assessment

5.2.6 Records

Completed DSE Assessment Checklists are kept on each individual's personnel file.

5.2.7 Monitoring Requirements

The HR Officer is responsible for ensuring the DSE Assessment Checklist is emailed to all relevant staff, completed and returned on an annual basis.

5.2.8 Related Documents

DSE Assessment Checklist

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\DSE Assessments

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?newTargetListUrl=%2Fcompanyweb%2FHealth%20%20Safety&viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FPermits%2C%20Forms%20and%20Questionnaires>

5.3 Manual Handling Risk Control Procedures

5.3.1 Introduction

Plastica shall make a suitable and sufficient assessment of the risks to our employees who undertake manual handling tasks. The assessment will be reviewed and amended as necessary and the assessment will be documented. Training will be provided to all staff on manual handling techniques.

5.3.2 Scope

The procedures relate to all staff who undertake manual handling tasks.

5.3.3 Legislation and Related Documents

Management of Health & Safety at Work Regulations (1999)
Health & Safety at Work Act (1974)

5.3.4 Procedure

All staff who undertake manual handling tasks are required to watch a Manual Handling DVD annually and read and understand the relevant Risk Assessment.

5.3.5 Responsibilities

HR Officer – to ensure the Manual Handling DVD is watched annually.
Manager's – to ensure all manual handling processes are adhered to, take any actions required from the assessment and highlight any changes that may be required.

5.3.6 Records

Staff Training Records
Signed Risk Assessment

5.3.7 Monitoring Requirements

My Compliance notifies of upcoming review dates.

5.3.8 Related Documents

Manual Handling Assessment Checklist

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Check Lists and Forms

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?newTargetListUrl=%2Fcompanyweb%2FHealth%20%20Safety&viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FPermits%2C%20Forms%20and%20Questionnaires>

5.4 Control of Legionella Risks

5.4.1 Introduction

Plastica shall make a suitable and sufficient assessment of the risks of our employees and non-employees from Legionella. The assessment will be reviewed and amended as necessary and the assessment will be documented.

5.4.2 Scope

The procedures relate to all staff and visitors (including contractors).

5.4.3 Legislation and Related Documents

Health & Safety at Work Act (1974)

Management of Health & Safety at Work Regulations (1999)

Control of Substances Hazardous to Health Regulations (2002) COSHH

Approved Code of Practice for Legionella

5.4.4 Procedure

The FOD HSFE and the HR HSFE shall ensure that there is an up to date, suitable and sufficient Risk Assessment. They will work with a department supervisor/manager to undertake an assessment and ensure that it is kept up to date at all times.

The Risk Assessment will be reviewed annually or in the event of a significant incident, a significant change to the business or processes or change of legislation.

5.4.5 Responsibilities

The FOD HSFE and the HR HSFE to create, review and ensure a suitable and sufficient Risk Assessment is available.

Supervisors/Managers to ensure relevant staff read, sign and understand the Legionnaires Risk Assessment

Relevant employees to read, understand and sign the Legionnaires Risk Assessment.

5.4.6 Records

Staff Training Records

Signed Risk Assessment

Weekly Checks by Department

5.4.7 Monitoring Requirements

Regular review of Document Registers.

5.4.8 Related Documents

Legionnaires Disease RA57

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Risk Assessments\Risk Assessments - New

Copy:

5.5 Control of Stress Risks

5.5.1 Introduction

Plastica shall make a suitable and sufficient assessment of the risks of our employees and non-employees from stress. The assessment will be reviewed and amended as necessary and the assessment will be documented.

5.5.2 Scope

The procedures relate to all staff.

5.5.3 Legislation and Related Documents

Health & Safety at Work Act (1974)

Management of Health & Safety at Work Regulations (1999)

5.5.4 Procedure

To have in place a Mental Health & Wellbeing Policy that is always available on the Company Intranet. To ensure the policy is understood and followed by all employees by issuing to all employees and offering discussion and training if needed.

To refer to the Mental Health & Wellbeing Policy in the Employee Handbook. To issue a copy of the Employee Handbook to everyone being offered a job at Plastica. To confirm they have received and understood the Handbook during the Induction process. To refer to the Mental Health & Wellbeing Policy during the Induction of new staff so they are fully aware of its existence and where to find it.

To have at least one fully trained Mental Health First Aider and to confirm their roles by way of informative emails and posters on the three noticeboards.

5.5.5 Responsibilities

All employees are responsible for their own mental health and wellbeing and to take reasonable care that their actions do not affect others in the workplace.

Managers and supervisors have a responsibility to monitor their own workplaces and employees, identify hazards and risks and take steps to eliminate or reduce these as far as is reasonably practicable.

Mental Health First Aiders are trained to offer help and provide initial help to anyone with a mental health issue or crisis.

5.5.6 Records

For privacy reasons no records of mental health discussions are kept.

My Compliance logs the signing of all Risk Assessments and notifies of review dates.

5.5.7 Monitoring Requirements

The Mental Health First Aiders in consultation with the FOD HSFE and the HR HSFE will review the Policy and provisions to ensure they are effective and relevant on an annual basis.

5.5.8 Related Documents

Mental Health & Wellbeing Policy

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Policy & Other Documents

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FHealth%20and%20Safety%20Policies>

Employee Handbook

Master: \\plas-nas\sarah.newman\PC Backups\Current Staff\Company Handbook\New Handbook and Policies

Copy:

<https://plasticltd.sharepoint.com/companyweb/HR/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHR%2FForms%2FAllItems.aspx>

Stress, Mental Health & Wellbeing Risk Assessment RA55

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Risk Assessments\Risk Assessments - New

Copy:

[https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&viewid=00000000%2D0000%2D0000%2D0000000000000000&id=%2Fcompanyweb%2FHealth%20%20Safety%2FRisk%20Assessments%2FNew%20Versions](https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&viewid=00000000%2D0000%2D0000%2D0000%2D0000000000000000&id=%2Fcompanyweb%2FHealth%20%20Safety%2FRisk%20Assessments%2FNew%20Versions)

5.6 Control of Substances Hazardous to Health

5.6.1 Introduction

Plastica shall make a suitable and sufficient assessment of the risks of our employees and non-employees of excessive noise. The assessment will be reviewed and amended as necessary and the assessment will be documented.

5.6.2 Scope

The procedures relate to all staff and visitors (including contractors).

5.6.3 Legislation and Related Documents

Control of Substances Hazardous to Health Regulations (2002) COSHH
Health & Safety at Work Act (1974)
Management of Health & Safety at Work Regulations (1999)

5.6.4 Procedure

For all hazardous substances we ask the supplier for the Safety Data Sheets, the FOD HSFE and the HR HSFE to create, review and ensure a suitable and sufficient Risk Assessment is available based on the information given and the application of the product.

Risk Assessments will be reviewed annually or in the event of a significant incident, a significant change to the business or processes or change of legislation.

5.6.5 Responsibilities

The FOD HSFE and the HR HSFE to create, review and ensure a suitable and sufficient Risk Assessment is available.

Supervisors/Managers to ensure relevant staff read, sign and understand relevant Risk Assessments.

Relevant employees to read, understand and sign the Risk Assessments.

5.6.6 Records

Staff Training Records
Signed Risk Assessment

5.6.7 Monitoring Requirements

Regular review of Document Registers.

5.6.8 Related Documents

COSHH Assessment Form

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\COSHH

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?newTargetListUrl=%2Fcompanyweb%2FHealth%20%20Safety&viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FCOSHH>

5.7 Noise

5.7.1 Introduction

Plastica shall make a suitable and sufficient assessment of the risks of our employees and non-employees of excessive noise. The assessment will be reviewed and amended as necessary and the assessment will be documented.

5.7.2 Scope

The procedures relate to all staff and visitors (including contractors).

5.7.3 Legislation and Related Documents

Health & Safety at Work Act (1974)

Management of Health & Safety at Work Regulations (1999)

5.7.4 Procedure

Regular noise tests are carried out using our decibel monitor in the recognised departments where noise levels are high or in the event of a significant incident, a significant change to the business or processes or change of legislation.

For those areas that exceed 85db health surveillance has been instigated.

5.7.5 Responsibilities

The Health & Safety Committee will undertake the annual assessment.

Manager's/Supervisor's will notify the Health & Safety Committee if they have any concerns.

5.7.6 Records

Training Records

Noise Assessment Records

5.7.7 Monitoring Requirements

Regular review of Document Registers.

5.7.8 Related Documents

Annual Health Surveillance Paperwork

5.8 New and Expectant Mothers

5.8.1 Introduction

Plastica shall make a suitable and sufficient assessment of the risks of our new and expectant mothers. The assessment will be reviewed and amended as necessary and the assessment will be documented.

5.8.2 Scope

This risk assessment relates to a new or expectant mother. A new or expectant mother is someone who is pregnant, who has given birth within the previous six months or who is breastfeeding.

5.8.3 Legislation and Related Documents

Management of Health & Safety at Work Regulations (1999)
Health & Safety at Work Act (1974)

5.8.4 Procedure

On notification from an employee that they are pregnant the Supervisor/Manager will print out the New and Expectant Mothers Risk Assessment Form and complete it with the employee. The Supervisor/Manager must deal with any highlighted risks and reduce these. Further guidance can be obtained from the FOD HSFE or the HR HSFE. The HR HSFE retain these on file.

If there are any material changes to the role or the pregnant employee informs us of any changes a new Risk Assessment must be carried out immediately.

5.8.5 Responsibilities

The Manager/Supervisor of the employee - to undertake the Risk Assessment.
The HR Officer - to ensure all the relevant paperwork has been completed.
The FOD HSFE and HR HSFE – assist with the risk assessment if required.

5.8.6 Records

A Risk Assessment for New or Expectant Mothers at Work must be completed and retained on the personnel file of the individual.

5.8.7 Monitoring Requirements

If there are any material changes to the work the new or expectant mother is involved in a re-assessment must be immediately carried out. If the new or expectant mother informs us of any other reason for a change a re-assessment must be immediately carried out.

5.8.8 Related Documents

New and Expectant Mothers Risk Assessment RA 07

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Risk Assessments\Risk Assessments - New

Copy:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?newTargetListUrl=%2Fcompanyweb%2FHealth%20%20Safety&viewpath=%2Fcompanyweb%2FHealth%20%20Safety%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHealth%20%20Safety%2FRisk%20Assessments%2FNew%20Versions>

Risk Assessment Guidance

Master: \\plas-nas\sarah.newman\PC Backups\Policies and Procedures\Maternity & Paternity\Health & Safety

Copy:

<https://plasticltd.sharepoint.com/companyweb/HR/Forms/AllItems.aspx?newTargetListUrl=%2Fcompanyweb%2FHR&viewpath=%2Fcompanyweb%2FHR%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHR%2FMaternity%2C%20Paternity%20and%20Adoption>

Health & Safety Checklist

Master: \\plas-nas\sarah.newman\PC Backups\Policies and Procedures\Maternity & Paternity\Health & Safety

Copy:

<https://plasticltd.sharepoint.com/companyweb/HR/Forms/AllItems.aspx?newTargetListUrl=%2Fcompanyweb%2FHR&viewpath=%2Fcompanyweb%2FHR%2FForms%2FAllItems%2Easpx&id=%2Fcompanyweb%2FHR%2FMaternity%2C%20Paternity%20and%20Adoption>

5.9 Work at Height

5.9.1 Introduction

Plastica limits the need to work from height.

Plastica shall make a suitable and sufficient assessment of the risks of our employees and non-employees from working at height. The assessment will be reviewed and amended as necessary and the assessment will be documented.

5.9.2 Scope

The procedures relate to all staff and visitors (including contractors) when necessary.

5.9.3 Legislation and Related Documents

Health & Safety at Work Act (1974)

Management of Health & Safety at Work Regulations (1999)

5.9.4 Procedure

To avoid working at height if possible.

The FOD HSFE and the HR HSFE shall ensure that there is a suitable and sufficient Risk Assessment. They will work with a department specialist to undertake an assessment.

The Risk Assessment will be reviewed annually or in the event of a significant incident, a significant change to the business or processes or change of legislation.

If working at height is required aids are used to limit risk.

5.9.5 Responsibilities

The FOD HSFE and the HR HSFE to create, review and ensure a suitable and sufficient Risk Assessment is available.

Supervisors/Managers to ensure relevant staff read, sign and understand the Risk Assessments

Relevant employees to read, understand and sign the Risk Assessments.

Competent external LOLER contractor to undertake 6 monthly inspections (where applicable).

5.9.6 Records

Staff Training Records
Signed Risk Assessment
Maintenance Records
LOLER Inspection Records

5.9.7 Monitoring Requirements

External LOLER contractor notifies us of inspection requirements

5.9.8 Related Documents

Various Risk Assessments

Master: \\plas-nas\sarah.newman\PC Backups\Health & Safety\Risk Assessments\Risk Assessments - New

Copies:

<https://plasticltd.sharepoint.com/companyweb/Health%20%20Safety/Forms/AllItems.aspx?viewid=00000000%2D00000%2D00000%2D000000000000&id=%2Fcompanyweb%2FHealth%20%20Safety%2FRisk%20Assessments%2FNew%20Versions>

6.0 Legal and Other Requirements

6.1 Legal and Other Requirements Procedure

6.1.1 Introduction

Plastica shall abide by all relevant legislation. Plastica shall have a process to ensure all legislative updates are reviewed, understood and actioned as necessary and in the event of a significant incident, a significant change to the business or processes or change of legislation.

6.1.2 Scope

The procedures relate to all staff, visitors (including contractors), customers, suppliers and general public when necessary.

6.1.3 Legislation and Related Documents

Health & Safety at Work Act (1974)
Management of Health & Safety at Work Regulations (1999)
Provision and Use of Work Equipment Regulations (1998) PUWER
Control of Major Accidents and Hazards (1999) COMAH
Display Screen Equipment Regulations (2002)
Working at Height Regulations (2005)
Lifting Operations Lifting Equipment Regulations (1998) LOLER
Control of Substances Hazardous to Health Regulations (2002) COSHH

6.1.4 Procedure

The FOD HSFE and the HR HSFE shall ensure Plastica abide by all relevant legislation, any infractions will be addressed via our Disciplinary Procedure if necessary.

Our processes will be reviewed on a regular basis in line with any regulatory changes, or in the event of a significant incident, a significant change to the business or processes or change of legislation. We are informed of any regulatory changes via HSE updates, Institute of Occupational Safety and Health and My Compliance.

6.1.5 Responsibilities

The FOD HSFE and the HR HSFE review all updates, ongoing training and personal development and ensure Plastica abide by all relevant legislation. The FOD HSFE holds a Level 3 NEBOSH qualification.

6.1.6 Records

My Compliance

6.1.7 Monitoring Requirements

HSE updates
IOSH updates
My Compliance

6.1.8 Related Documents

Relevant ACOPS
Guidance notes

7.0 Objectives and Programme(s)

Plastica aims to develop an environment which is safe where we minimise the risk of accidents and stress as low as reasonably practicable. The procedures relate to all staff, visitors (including contractors), customers, suppliers and general public when necessary.

The FOD HSFE and the HR HSFE shall maintain a robust health and safety policy which is regularly reviewed and updated when necessary.

Our objective is to maintain and improve our current incident rate and reduce the current level of risk. We will achieve this through:

- Monthly walk throughs
- Audits
- Reviewing incidents
- Creating and updating our risk assessments
- Ongoing regular training with our employees
- Positively feeding information back to the workforce

Our intentions for 2024 are:

- To maintain our ISO 14001 and 45001 accreditations
- To continually improve our health, safety, fire and environmental systems and processes.

The FOD HSFE and the HR HSFE shall ensure the objectives are monitored to ensure the objectives/intentions are achieved and will review them if necessary. They will ensure the resources are available for the objectives/intentions to be met.

8.0 Resources, Roles, Responsibility, Accountability and Authority

FOD HSFE – responsible for implementation, monitoring and ensuring we meet current and future legislation. Ensuring suitable resources are available when needed. Accountable to the shareholders of the company and HSE.

HR HSFE – to assist the FOD HSFE – responsible for implementation, monitoring and ensuring we meet current and future legislation. Ensuring suitable resources are available when needed. Accountable to the FOD HSFE (and to the shareholders of the company and HSE in the absence of FOD HSFE).

Department Managers, Supervisors, Snr Operatives and Team Leaders – ensure that all staff follow the Health & Safety procedures and report any incidents in the appropriate manner. Accountable to FOD HSFE and HR HSFE.

Other Employees – to ensure themselves and their colleagues follow Health & Safety procedures and legislation and report any incidents or concerns in the appropriate manner. Accountable to their Department Managers, Supervisors, Snr Operatives and Team Leaders.

External Health with Safety Advisor(s) (to be appointed as and when necessary) – to assist with any aspects of Health & Safety outside of the competencies of FOD HSFE and HR HSFE.

9.0 Competence, Training and Awareness

Employees are trained to be competent in their roles, we review and monitor their performance to ensure the level of competence is maintained. Competency matrices are completed for all employees.

If an employee is found to be lacking in any competency, further training would be offered and monitored. Following additional training if an employee is still unable to perform the duties, alternative action will be considered including redeployment and termination.

If we have no competent person for a specific task, we would look to bring in a suitably trained and competent contractor.

Training records are kept on My Compliance, the Induction Training Process is reviewed at 4 weeks, 3 months and 6 months and individual training requirements are reviewed at One to One meetings.

Health & Safety Training includes NEBOSH, Fire Safety Training, First Aiders, Mental Health & Wellbeing First Aiders.

Health & Safety meetings ensure managers are aware of current incidents and issues.

Our Health & Safety Policy is on display on the Noticeboards and available on the Intranet (along with all other H&S Policies).

Accident and Incident Reports lead to a full investigation which is reported back to relevant individuals.

Monthly Walk Throughs highlight issues within areas which are documented and actions taken where needed.

10.0 Communication and Consultation

Health & Safety is discussed at the H&S quarterly meetings, the monthly Operations Meeting and the annual Integrated System Management Review. Snr managers inform Managers and Supervisors of any relevant information who then communicate relevant information to

the employees as necessary. The H&S meetings, Operations Meetings and Integrated System Management Review meetings are minuted.

Noticeboards have a Health & Safety section which is used to display relevant information.

11.0 Documentation

HS&E 01 Health and Safety Policy
HS&E 02 The Major Accident Prevention Policy
HS&E 03 Lower Tier COMAH Site – Emergency Plan
HS&E 04 Personal Protective Equipment (PPE) Policy
HS&E 05 Yard Policy
HS&E 06 Lone Working Policy
HS&E 07 Driving at Work Policy
HS&E 08 Driver Handbook
HS&E 09 Mental Health & Wellbeing Policy
HS&E 10 Safety Management System
HS&E 11 Environmental Policy
HS&E 12 First Aid Policy
HS&E 13 Change Management Procedure
HS&E 14 Change Procedure
HS&E 15 Fire Evacuation Procedure
HS&E 16 Fire Safety Policy
HS&E 19 Fire Officer Handbook
HS&E 20 Environmental Incident Investigation Policy and Procedure
Risk Assessments
Safe Systems of Work
Training Documents
Competency Matrix
Accident and Incident Records
Leading Investigation
Health & Safety Forms
Inspection and Maintenance Records

12.0 Controls of Documents

All H&S documents have the date they were last updated and a version number. Any changes are dealt with internally and access to them is restricted. PDF versions are available on the Intranet.

We have a standard document review procedure – documents are reviewed and amended, version numbers and dates are updated and then issued for review and resigning.

Our documentation is reviewed on a regular basis in line with any regulatory changes, or in the event of a significant incident, a significant change to the business or processes or change of legislation

13.0 Operational Control

13.1 Control of Electrical Risks

To ensure the safety of electrical equipment Plastica has the following procedures in place:

- Three year fixed wiring check (Perimeter House completed August 2019 and Unit 82 completed September 2020) by a suitably competent contractor
- Regular PAT Testing where applicable by a suitably trained employee or competent contractor
- Risk Assessments reviewed on a regular basis in line with any regulatory changes, or in the event of a significant incident, a significant change to the business or processes or change of legislation.
- Routine maintenance of machinery and all electrical installations by trained employees or a suitably competent contractor
- Repairs undertaken by a suitably competent contractor

Test certificates and maintenance documents are kept for the required period of time.

Maintenance schedules are reviewed regularly or as required.

13.2 Control of Gas Risks

Gas heaters are serviced once a year by a competent contractor

Gas supply to the building is relatively limited.

Any repair work would be undertaken by a competent contractor

Forklift gases are stored in a suitable safe location, outside in a locked container

Empty forklift gases are stored separately as per industry standards

Gas bottles are stored as per industry standards

Maintenance records are kept for the required period of time if applicable.

Any deviation to these rules would be noted on regular company walk throughs.

13.3 Young People and Work Experience Procedures

Young People and Work Experience people are kept to a minimum and kept away from any areas considered to be dangerous to them. They are always supervised and never left alone to use equipment.

An induction process is carried out and a Risk Assessment is undertaken on an individual basis and explained thoroughly.

13.4 Control of Off Site Working

Plastica undertakes various off site functions, predominantly lining swimming pools and installation of commercial covering systems.

A visual check is undertaken for each site and a dynamic Risk Assessment is completed on arrival at site.

Our customer is informed as to what we expect of the site on arrival. Our employees are expected to contact their Manager if they believe the site is unsafe.

Tools are regularly PAT tested

The teams are trained in Manual Handling.

Regular contact is made by the Manager of the department with the teams on site.

13.5 Control of Contractors and Visitors

Plastica only use approved competent contractors and ideally those that have completed work for the company previously.

A site induction is undertaken. This includes COMAH information, Yard Policy, Fire Safety and any information specific to their task.

All Contractors and Visitors are required to sign in and out and visitors are accompanied where applicable.

RAMS and insurance documents are requested prior to any work taking place.

Contractor's performance during the work is monitored.

Use HSEF 01 Contractor Approval Form and HSEF 02 Contractor Induction Form.

13.6 Control of Driving for Work

HS&E 07 Driving at Work Policy and HS&E 08 Driver Handbook must be abided by.

Those that drive work vehicles or their own vehicle on an ad hoc basis are required to provide their driving licence on an annual basis for the required checks.

Those that drive their own vehicles and receive a car allowance are required to provide their driving licence on an annual basis for the required checks and to provide proof that their vehicle is insured, has an MOT and is regularly serviced.

All company vehicles have a tracking device fitted to monitor performance, speed and to provide confirmation of location with regards to lone working.

13.7 Violence and Aggression

Plastica has a zero tolerance procedure to violence and aggression in the workplace.

Any occurrence will be dealt with under the company's disciplinary procedure.

13.8 Lone Working Procedure

HS&E 06 Lone Working Policy

It is Plastica's aim to minimise lone working but where it does occur there is a detailed Risk Assessment and Policy in place to minimise the risk to the individual.

13.9 Permits to Work

It is Plastica's aim to negate the need for permits to work.

Plastica issues Hot Works Permits when necessary and will consider other situations such as confined spaces if the need arises.

A Hot Work Permit is documented and signed and signed off as completed. Records are kept.

The Operations Manager is responsible for issuing and recording Hot Works Permits. Responsibility is passed to a suitably competent person in their absence.

13.10 Personal Protective Equipment

HS&E 04 Personal Protective Equipment (PPE) Policy

Plastica will provide all staff with the relevant suitable PPE as and when required as per our PPE Policy.

All PPE is purchased from a registered supplier.

Regular checks are made on PPE as necessary.

Training is provided where necessary.

PPE requirements are documented in Risk Assessments and discussed at Induction.

13.11 Control of Lifting Operations Including Forklift Truck's

Plastica's lifting equipment operations are governed by the Lifting Operations Lifting Equipment Regulations (1998). All our lifting equipment is inspected by an external competent contractor on the scheduled legally required intervals.

All LOLER inspection records are kept.

All faults are rectified as per the report.

13.12 Control of Non-Routine Activities

Risk Assessments for non-routine activities are undertaken, taking into account relevant legislation. Risk Assessments are conducted by trained personnel and the activity is regularly

monitored, and the procedure will be reviewed and action taken if necessary. Any activity is stopped if it is deemed unsafe.

13.13 Use of Compressed Gas Cylinders

Forklift gases are stored in a suitable safe location, outside in a locked container
Empty forklift gases are stored separately as per industry standards
Gas bottles are stored as per industry standards

Maintenance records are kept for the required period of time if applicable.

Any deviation to these rules would be noted on regular company walk throughs.

14.0 Emergency Preparedness and Response

14.1 First Aid Policy

HS&E 12 First Aid Policy

Plastica provides sufficient, suitably trained First Aiders and trained Mental Health First Aiders.

The First Aiders have suitable and sufficient medical supplies and are responsible for ensuring stock levels are maintained.

Our site is located 2 miles away from an Accident & Emergency Department.

Plastica have an Accident Reporting Procedure, each incident is investigated to ensure prevention of further accidents. They are reviewed and records kept.

14.2 Fire Safety Procedure

Plastica have a Fire Evacuation Plan.

Suitably trained Fire Officer and Fire Wardens. Two NEBOSH Fire and Emergency Planning trained employees.

emergency.plasticapools.net – our Emergency Information site, access is limited to our Fire Officer's and ICT Assistant (responsible for updating site) and the East Sussex Fire Response Service.

Sections include:

- Company/Building Information
- Emergency Site Information
- Emergency Plans
- Reports
- Chemical Datasheets
- Chemicals on site

- Fire Info
- Safety Lighting
- Spill Info

The Fire Officers are responsible for organising fire drills, ensuring fire alarms and equipment is suitably maintained and tested, the building is fire stopped, the Fire Wardens are trained and a sufficient number are available. The Fire Officers are all involved in ensuring Fire Safety Procedure is up to date and enforced.

15.0 Performance Measurement and Monitoring

15.1 Performance Measurement and Monitoring Procedure

Monthly Walk Throughs

Quarterly Health & Safety Meetings

Monthly, Quarterly, Half Yearly, Annual Health & Safety Checks

Drills and Tests

Maintenance Checks

LOLER Inspections

DGSA Visits

HSE/EA Visits

Accident Reporting

Incident Reporting

All the above are documented and reviewed.

16.0 Evaluation of Compliance

16.1 Evaluation of Compliance Procedure

When purchasing new equipment, we ensure it meets the relevant required Health & Safety standards.

Legislation is monitored to ensure compliance.

Advice from HSE and DGSA to ensure compliance

Member of a COMAH group for advice and guidance to ensure compliance.

Membership of professional bodies.

Review Risk Assessment annually.

Provide training to all staff when required.

Perform drills and tests to review our performance and act on any findings as appropriate and change procedures if necessary.

17.0 Incident Investigation

17.1 Investigation and Reporting of Incidents

Accident and Incident Reporting
COMAH Incident Reporting

All accidents and incidents on site are reported and investigated. Any required reports are made to RIDDOR. If deemed necessary disciplinary action is taken following a full investigation if procedures have not been followed.

18.0 Non-conformity, Corrective Action and Preventative Action

18.1 Non-conformity

Non-conforming activities would be identified during walk throughs or by the relevant department management/supervisor or accident and incident reporting.

18.2 Corrective Action

If deemed to be dangerous in any way the process would be stopped immediately, for more minor issues these would be discussed with relevant supervisor/manager and given a priority rating, an action plan raised and completion date agreed.

Accident and Incident Reporting Forms have a section for required corrective action.

18.3 Preventative Action

From any situation that arises, the procedure is reviewed and if any further improvements can be made to prevent future incidents these will be investigated and implemented.

Training will be considered/reviewed and provided where relevant.

19.0 Control of Records

19.1 Document and Record Control Procedure

All training records will be held on My Compliance, a software database (ongoing upload). My Compliance is used to record all actions and requirements (e.g. Incident and Accident Reports, Training Records and Risk Assessments). The system will prompt and remind training actions when due and it advises on current legislation updates.

Our documents will be reviewed on a regular basis in line with any regulatory changes, or in the event of a significant incident, a significant change to the business or processes or change of legislation.

Health, Safety and Environmental documentation is currently being transferred into Document Registers.

20.0 Internal Audit

20.1 Audit Arrangements

Audits are undertaken annually in January.

21.0 Management Review

21.1 Management Review Procedure

We are responsible for organising our Integrated System Management Review process. This is conducted on an annual basis, documented and actioned. Outcomes are discussed at quarterly review meetings.