



Total Locker Service

Health and Safety Policy and Procedures Manual

developed in consultation
with
SHE Management (UK) Ltd

The Managing Director of Total Locker Service (together with SHE Management (UK) Ltd where applicable) will review the contents of this document at least every 12 months to ensure it reflects its policies, objectives and legislative requirements.

Any discrepancies or modifications will then be made to the document before it is signed by the Managing Director (or equivalent).

Employees are encouraged to bring to the attention of their manager, any aspect of this policy which in their opinion is inadequate or unworkable. All such comments will be considered and evaluated prior to the policy being updated.



Health & Safety Policy & Procedures Manual

Record of Amendments

Date	Issue	Amended By	Comments/Details
January 2014	001	N/A	New Document
August 2015	002	John Scott	update
August 2015	003	John Scott	Update CDM 2015
August 2016	004	John Scott	update
August 2017	005	John Scott	update
August 2018	006	John Scott	update
October 2018	007	John Scott	update
October 2018	008	Gary Beckley, SHE	Revised document
January 2020	009	Gary Beckley SHE	Reviewed & Amended: First Aid & Welfare
March 2021	010	John Scott	update
March 2023	011	John Scott	update

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Section 1

General Statement of Health & Safety Policy



Health and Safety Policy Statement of Intent

Total Locker Service regards Health & Safety at Work as a business priority and requires the co-operation of all employees to establish and maintain high standards. We believe all injuries and occupational ill-health can be prevented and in pursuit of this aim, our policy is:

- To provide the resources necessary to create and maintain a safe and healthy working environment and systems of work for all our employees, contractors and visitors.
- To commit to the prevention of injury and ill health and continual improvement in occupational health and safety management and performance.
- To comply with all applicable legal requirements and to any other occupational health and safety requirements to which we subscribe.
- To provide such information, training and supervision as is needed.
- To prevent our activities and omissions adversely affecting the health and safety of others.
- To regularly set and review health and safety objectives and targets at all levels within the company.
- To ensure every person's responsibility and accountability for safety is clearly defined and understood.
- There will be a formal annual review to ensure our policies are effectively implemented, monitored, kept up to date and reflect business change both internally and externally.
- To work in partnership with the workforce on matters of health and safety.

This policy will be made available to all employees and other interested parties

Signed

A handwritten signature in black ink, appearing to read 'J Scott'.

John Scott
Director

January 20230

Section 2

Organisation & Responsibilities

Organisation

The effectiveness of the Safety Policy is dependent on the people who are responsible for ensuring that all aspects of work are carried out with consideration for safety and with minimum risk to health.

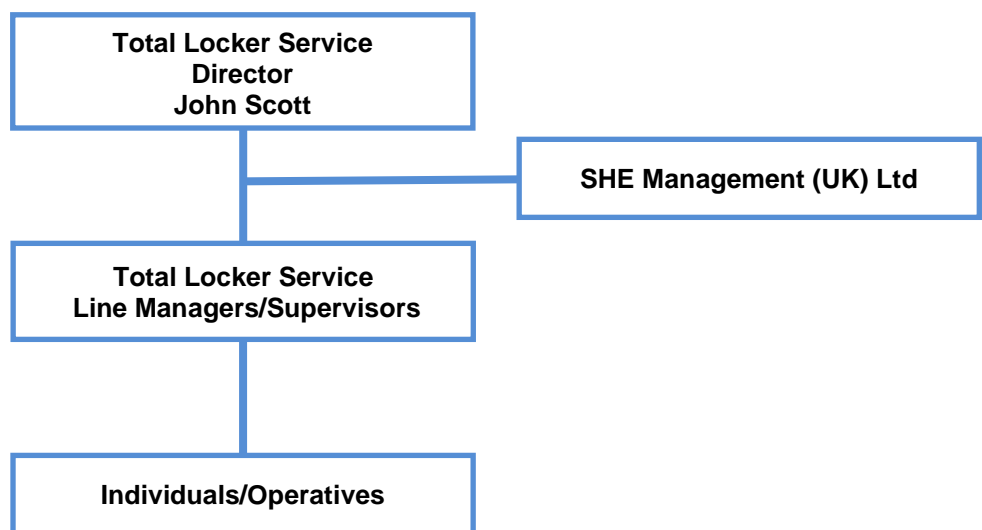
Ultimate responsibility lies with John Scott, Total Locker Service Director, but specific duties are delegated to others according to their experience and training.

Line Managers and Supervisors, both individually and collectively, will ensure that this policy is applied throughout the whole company and that those employed by Total Locker Service are kept fully informed of its content.

Each individual person has a duty of care to themselves as well as to all those they come into contact with during the working day.

To assist the company in fulfilling its duties and obligations, SHE Management (UK) Ltd has been appointed to provide health and safety advice and assistance to the management and employees of Total Locker Service.

To ensure the prevention of ill health and the avoidance of accidents and the promotion of safe and healthy workplaces, a responsibilities matrix has been established overleaf.



Responsibilities Matrix

Ser.	Detail	Responsible(*= where requested)
1. Responsibilities:		
1a.	Who has overall responsibility for health and safety?	John Scott
1b.	Who will be signing the H&S Policy Statement?	John Scott
1c.	Who is responsible for the day-to-day implementation of H&S Policies?	Site Supervisors
2. Risks arising from work activities:		
2a.	Who will ensure Risk Assessments are carried out?	John Scott
2b.	Who should risk assessment findings be reported to?	John Scott
2c.	Who will approve the action required to control risk?	John Scott
2d.	Who will be responsible for ensuring the action is implemented?	John Scott
2e.	Who will check that the actions taken have reduced the risks?	John Scott
3. Consultation with employees:		
3a.	Who is responsible for ensuring consultation with employees?	John Scott
3b.	Who do employees consult if they have a health and safety concern?	John Scott (SHE Management*)
4. Safe work equipment:		
4a.	Who is responsible for identifying property and equipment maintenance requirements?	John Scott
4b.	Who is responsible for ensuring identified maintenance requirements are implemented?	John Scott
4c.	To whom will identified defects in property and equipment be reported?	Site Supervisors
5. Safe handling and use hazardous of substances:		
5a.	Who will be responsible for identifying substances hazardous to health?	John Scott
5b.	Who will be undertaking hazardous substance assessments?	John Scott (SHE Management*)
5c.	Who will be responsible for implementation of measures following the assessments?	Site Supervisors
6. Information, instruction and supervision:		
6a.	Who is your 'competent person' who advises you on H&S Matters?	SHE Management (UK) Ltd
6b.	Who will approve the employment of Young Persons (those under 18 years of age)?	John Scott
6c.	Who will supervise young workers/trainees?	Site Supervisors
7. Competency and training:		
7a.	Who will identify training requirements?	John Scott
7b.	Who will arrange and monitor training?	John Scott (SHE Management*)
7c.	Who will ensure induction training is provided for all employees?	Site Supervisors
7d.	Who will provide job specific training?	Training Providers
7e.	Who will administer training records?	John Scott
8. Accidents, first aid and work-related ill health?		
8a.	Who will identify health surveillance requirements?	John Scott
8b.	Who will arrange health surveillance?	John Scott (SHE Management*)
8c.	Who will administer health surveillance records?	John Scott
8d.	Who will identify first aid requirements?	John Scott
8e.	Who will be responsible for reporting accidents, diseases and dangerous occurrences (RIDDOR) to the enforcing authority?	John Scott (SHE Management*)

9. Reactive Monitoring		
9a.	Who will be responsible for investigating accidents?	John Scott (SHE Management*)
9b.	Who will be responsible for investigating sickness absence?	John Scott
9c.	Who will be responsible for acting on investigation recommendations?	Site Supervisors
10. Emergency procedures		
10a.	Who will ensure property risk assessments (including fire risk assessments) are carried out?	John Scott
10c.	Who will ensure that arrangements are maintained?	John Scott
11. Audits		
11a.	Who will assess audit requirements?	John Scott
11b.	Who will carry out health and safety audits?	SHE Management (UK) Ltd*
11c.	Who will be responsible for the implementation of the audit's findings?	Site Supervisors

Directors

The Directors of Total Locker Service are responsible for:

- Keeping this Health and Safety Policy under review and ensuring that it is revised as and when necessary;
- Monitoring the Policy's implementation, and setting targets or objectives where appropriate;
- Reporting on progress to employees and other where required;
- Identifying any faults or areas of weakness in the Policy or its implementation;
- Ensuring that the relevant resources are made available to enable the Policy to be implemented.

Line managers/supervisors

All line managers/supervisors, where appointed, are responsible for:

- The practical implementation of this Health and Safety Policy, the Health and Safety at Work etc. Act 1974, and other relevant legislation;
- Ensuring that the operations under their control are, as far as is reasonably practicable, conducted without detriment to the health and safety of employees or others who may be affected by their activities;
- Ensuring that their area of responsibility is subject to risk assessment, regular inspections and monitoring;
- Ensuring that all accidents, incidents and near misses, within their area of responsibility, are reported, reviewing all such reports and ensuring that a full investigation is carried out and appropriate remedial action taken, where necessary.
- Ensuring that no young persons are employed unless a suitable risk assessment has been carried out.

Individual responsibilities

All employees are required to:

- Co-operate in implementing the requirements of this Health and Safety Policy, related codes of practice and safety instructions;
- Refrain from doing anything which constitutes an unacceptable danger to themselves or others;
- Immediately bring to the attention of their line management/supervisor any situations or practices which may lead to injuries or ill health;
- Ensure that any equipment issued to them, or for which they are responsible, is correctly used and properly stored;
- Be responsible for good housekeeping in the area in which they are working;

- Report all accidents, incidents, dangerous occurrences and near misses, in accordance with Total Locker Service guidance.

Contractors

All Contractors working with Total Locker Service are required to comply with appropriate rules and regulations governing their work activities. Contractors are legally responsible for their own workforce and for ensuring that their work is carried out in a safe manner.

Employee Consultation

All staff will be encouraged to openly discuss any safety issue with their supervisors or Total Locker Service directors; to make suggestions for improvements in workplace/site safety issues and to participate in the establishment of a positive safety culture.

Health and safety information will be communicated to staff in a number of ways, including safety signs/posters, information being displayed on Total Locker Service safety notice boards; through site safety briefings/toolbox talks and through the issue of memos and procedures to each employee. Wherever necessary, all staff shall be consulted on changes in health and safety arrangements and given the opportunity to discuss any proposals or changes that may be required.

Section 3

Arrangements

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Risk Assessments and Safety Method Statements

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Total Locker Service will carry out the following procedures to provide health and safety for their employees.

- Assess the risks to the health and safety of each employee and of anyone else who may be affected by the work activity. The identification of all foreseeable hazards and risks will enable the necessary preventive and protective control measures to be implemented.
- Each assessment will outline the hazards and risks associated with each working activity and highlight the controls to be instigated to minimise the risks and hazards identified.
- This risk assessment will be recorded and copies issued to all those affected.
- Where the risk assessment identifies it is needed (or by a requirement placed on us by a client) we will produce a safety method statement.

The Works Supervisor will bring to the attention of the workforce all the necessary precautions detailed within the risk assessment and/or method statement.

The Works Supervisor will monitor the operations to ensure that each operative is acting in accordance with the details outlined in the written assessment.

Total Locker Service will make arrangements and/or liaise with contractors for putting into practice all the control measures which have been identified as being necessary in the risk assessment and any associated method statements.

Asbestos

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Exposure to Asbestos represents one of the greatest health risks to face today's construction workers. This is primarily due to the widespread use of the material during the construction and refurbishment of buildings during the 1940-80s, though asbestos was also used both before and after these dates. Asbestos may be present in a wide variety of products.

No work will be carried out on any building built or refurbished before the year 2000 unless a suitable Demolition Asbestos Survey has been carried out. This survey must be reviewed by Total Locker Service site management prior to work on site and any asbestos areas suspected or confirmed will be outlined to operatives during our site induction.

All work involving asbestos will only be carried out by persons who have received the proper training and who have the necessary equipment. Total Locker Service will ensure that all persons under their control who are involved with building; construction; installation of services and pipe-work etc.; maintenance; refurbishment; repair of existing structure where asbestos may be present, are provided with compulsory Asbestos Awareness Training. Records of this training will be maintained.

If any worker suspects that a material he is working on or is about to work on may contain asbestos, then he should stop work immediately and inform his supervisor so that further investigations may be carried out.

Consultation and Co-operation

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Total Locker Service will consult directly with our employees on health and safety matters. This consultation will take place to highlight legal requirements and the steps necessary to carry out our work in a safe and effective manner.

We aim to carry out regular informal meetings with our staff. The purpose of our meetings will be to:

- Monitor and review the effectiveness of the Safety Policy and Procedures
- Discuss any accidents or incidents that have occurred since the last meeting, investigate any commonality and instigate procedures for future prevention
- Consider amendments in the light of changing methods, requirements and legislation
- Receive and consider any reasonable request, recommendation or report on matters of health and safety from any employee and advise on any decision made
- Report and communicate on safety matters with all personnel
- Discuss any breaches of regulations and take steps to prevent re-occurrence
- Provide an open forum for the development of best practice

As no safety committee exists, all staff will be encouraged to openly discuss any safety issues with their supervisors or directors of Total Locker Service to make suggestions for improvements in workplace/site safety issues and to participate in the establishment of a positive safety culture.

Health and safety information will be communicated to staff in a number of ways, including safety signs/posters, information being displayed on Total Locker Service safety notice board; through site safety briefings/toolbox talks and through the issue of memos and procedures to each employee. Wherever necessary, all staff shall be consulted on changes in health and safety arrangements and given the opportunity to discuss any proposals or changes that may be required.

Contractor Control

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Prior to the award of any contract or package of works to any sub-contractor, Total Locker Service will first carry out a full competence and resources assessment to ensure that each contractor appointed has the necessary skills and resources required to successfully carry out the required works. A competence and resources questionnaire will therefore be issued to all such organisations, the contents of which will be reviewed by Total Locker Service from time to time, checks will be made to ensure that the assessment remains valid.

All sub-contractors shall be issued with a copy of Total Locker Service Health and Safety Policy Statement and a list of Safety Rules and Requirements. The following paragraph will be inserted in all contracts to sub-contractors.

"Please refer to the enclosed copy of our Company Health and Safety Policy Statement and list of Site Safety Rules and Requirements. Your acceptance of this contract will be deemed to include acceptance of the requirements of our company policy and those of both our Clients and/or the Principal Contractor. Please contact a Total Locker Service Company Manager should you require further information on any matter in connection with health, safety or welfare".

The Construction (Design and Management) Regulations 2015

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Duty Holders – Definitions:

Clients:

Organisations or individuals (including domestic clients) for whom a construction project is carried out. If Total Locker Service are having work done on their own premises, or where they are working for a domestic client, they will have client's duties. Where there is a domestic client, the duties are passed on to the Contractor or the Principal Contractor.

Principal Designers (PD):

A PD is a designer appointed by the client in projects involving more than one contractor. They can be an organisation or an individual with sufficient knowledge, experience and ability to carry out the role. We will not act as a PD.

Designers:

Those, who as part of a business, prepare or modify designs for a building, product or system relating to construction work. We will not be classed as a designer.

Principal Contractors (PC):

Contractors appointed by the client to coordinate the construction phase of a project where it involves more than one contractor. In most circumstances it is unlikely that Total Locker Service will be classed as PC on any projects they undertake. We will not act as a PC.

Contractors:

Those who do the actual construction work, and can be either an individual or a company. We will always have contractor duties.

Co-operation and Co-ordination

Where there is more than one contractor working on a site, whether the site is notifiable or not, there must be good co-operation and co-ordination between all parties. This will ensure that the work of one party does not put the others parties at risk of harm. Details of how the co-operation and co-ordination is to work on site must be detailed in the project plan for each site.

Responsibilities

Total Locker Service as a Client

If we have work carried out on our commercial premises or we are working for a domestic client, we could be classed as the client under CDM2015. The client's duties include making suitable arrangements for managing a project. This includes making sure:

- other dutyholders are appointed where there is more than one contractor (principal designer and principal contractor).
- sufficient time and resources are allocated
- Making sure relevant information is prepared and provided to other dutyholders, that the principal designer and principal contractor carry out their duties and welfare facilities are provided.

Total Locker Service as a Contractor

As a contractor, we must plan, manage and monitor construction work under our control so that it is carried out without risks to health and safety. Additionally, for projects involving more than one contractor we must coordinate our activities with others in the project team – in particular, comply with directions given to them by the principal designer or principal contractor and for single-contractor projects, prepare a construction phase plan.

Fire Precautions

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1. General Statement

Total Locker Service is a responsible employer and we take our fire safety duties seriously. For this reason we have formulated this policy to help us comply with our legal obligations to staff, our contractors and visitors. These include the provision of a safe place of work where fire safety risks are minimised. Due to its importance, this fire safety policy also forms part of the company's overall health and safety policy.

2. Employees' Duties

All Total Locker Service employees have a duty to take reasonable steps to ensure that they do not place themselves or others at risk of harm. They are also expected to co-operate fully with us in complying with any procedures that we may introduce to protect the safety and well-being of our staff, contractors and visitors.

3. Communication

We will keep staff informed of any changes that are made to our fire safety procedures and fire risk assessment. We will also ensure that all visitors to our premises are briefed in the evacuation procedures and not left alone unless they are aware of, and familiar with, all available escape routes.

4. Procedures

We have introduced the following procedures in order to maintain high standards of fire safety.

- a fire risk assessment has been undertaken which will be reviewed annually. However, more frequent reviews will occur if there are changes that will impact on its effectiveness. These may include alterations to the premises or new work processes
- the fire evacuation procedures will be practiced at least annually
- training will be provided, as necessary and appropriate
- all new members of staff and temporary employees will be provided with induction training on how to raise the alarm and the available escape routes
- all escape routes will be clearly signposted and kept free of obstructions at all times
- all fire-related equipment will be regularly serviced and maintained. If any employee notices defective or missing equipment, they must report it to a manager
- alarm systems will be tested regularly. Staff will be told when a test is scheduled any other safety systems will be checked regularly to ensure correct operation, where necessary, e.g. emergency lighting.

Procedures in the event of a fire

On discovering a fire

- if you discover a fire, raise the alarm immediately
- if you have been trained and feel that it is safe to do so, attempt to fight the fire using the equipment provided
- if this fails, evacuate immediately. Ensure that no-one is left in the room and close the door behind you
- ensure that you or the designated person has called the Fire & Rescue Service
- play your part in the roll-call so you are safely accounted for.

If you hear the fire alarm

- operate any essential shutdown devices, e.g. machinery
- immediately leave using the nearest available fire exit
- report to the assembly point for a roll-call
- if you are with a visitor, ensure they accompany you.

Fire marshals (where appointed)

- encourage staff nearby to evacuate and to proceed to the assembly point
- report to the person in charge, noting any absentees.

Person in charge

- gather all information regarding the evacuation
- establish if it is a genuine fire or false alarm
- ensure that the Fire & Rescue Service has been called
- liaise with the Fire & Rescue Service on its arrival.

TYPES AND SUITABILITY OF FIRE EXTINGUISHERS



The most widely used and available fire extinguisher. Used for **SOLIDS** such as paper, wood, plastic etc. NOT suitable for use on electrical or flammable liquids.



More versatile than water extinguishers. Used for **SOLIDS** such as paper, wood, plastic and **FLAMMABLE LIQUIDS** such as paraffin, petrol, oil etc.



Multi-purpose extinguisher, can be used on: **SOLIDS**; Paper, wood, plastic, fires. **FLAMMABLE LIQUIDS**: Paraffin, petrol, oil. **FLAMMABLE GASES**; Propane, butane, methane.



Carbon Dioxide Extinguishers are ideal for fires involving **ELECTRICAL APPARATUS**.

Carbon Dioxide will also extinguish **FLAMMABLE LIQUIDS** such as paraffin, petrol and oil.

Hot Works Procedures

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Introduction

The aim of this policy is to establish a system whereby all hot works are carried out in a controlled manner thereby reducing the risk of fire, which could affect personnel, plant, equipment and buildings. The definition of hot works includes any operation leading to the production of heat, flame or sparks that has the potential of leading to a fire or explosion.

Application

This procedure shall apply to all personnel under the control of Total Locker Service. It will apply to all forms of hot work, such as flame cutting, grinding, welding, soldering, heating torches, soldering, tar pots and any other work which could cause a fire risk.

Procedure

1. Once the requirement for hot work has been identified, either by risk assessment or the type of work, a permit must be requested from the Total Locker Service management.
2. Permits will only be valid for the day of issue. Any extension of time will require a new permit to be issued.
3. All notations must be legible and accurate.
4. Signatures are required where indicated. Initials are not acceptable.
5. Any changes to the hot work permit once it has been issued will have to be agreed with Total Locker Service management and the person carrying out the work.
6. A fire watch is to be provided during and after hot works.
7. To prevent unwanted fire alarm activations, isolation of smoke detectors, heat detectors may be necessary and will be designated on the permit.
8. Prior to hot work being carried out the supervisor must ensure that adequate provision has been made for protection of persons and surfaces in the vicinity of and below the hot work. (i.e. suitable flame retardant material, fire screens or approved fire blankets, cordons and signage). This will be checked prior to the permit being issued.
9. Suitable serviceable fire extinguishers of an appropriate type shall be provided by the supervisor close to the area where the work is to be carried out and shall be immediately accessible in the case of an emergency.
10. The Contractor is to ensure that all hot work equipment is suitable, correctly maintained and in good working order prior to work commencing.

First-Aid and Welfare

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A suitable number of first aid trained personnel and an adequate supply of first aid equipment will be provided by Total Locker Service. All work will be planned taking this into account via our risk assessment process.

The Project Manager will ensure that the welfare and first-aid requirements are established before work starts or that sub-contractors are notified of their requirement to provide such facilities.

The Works Supervisor will ensure that all planned welfare and first-aid facilities are available and that they are maintained to at least the minimum required standards.

A First Aid box is provided in the staff welfare area. The contents will be monitored and maintained by the Total Locker Service Appointed Person for first aid.

There may be a need for employees to use site first-aid facilities and in such cases employees will confirm arrangements prior to starting their work.

Total Locker Service will carry out a first aid needs assessment to determine the number of trained first aiders (in-date HSE approved course) to be employed by us. Additional first aiders will be provided in accordance with HSE guidance and subsequent first aid assessments.

We will ensure that suitable welfare facilities necessary for the well-being of our employees, such as washing, toilet, rest and changing facilities and somewhere clean to eat and drink during breaks are available on any worksite. We will instruct our workers on what welfare facilities are required and not to continue working where welfare facilities are inadequate.

Hazardous Substance Control

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A number of regulations impose requirements for the safe handling and use of substances which are known to be a risk to health. Primarily, ill health effects can be obtained from hazardous or toxic substances through:

- **External contact** — corrosive, skin absorption, dermatitis etc. (e.g.: cement, acids, epoxy resins etc.)
- **Inhalation** — gases, fumes, dusts, vapours
- **Ingestion** — swallowing

Total Locker Service will ensure that information is obtained on any material or substance to be used, or which is likely to be encountered and could be a hazard to the health of operatives. Where possible, arrangements should be made for an alternative less hazardous material to be specified.

Any necessary equipment, enclosures, extraction equipment, hygiene facilities, medical examinations, protective clothing, etc. must be planned and in place before any work commences.

Works Supervisors must ensure that all operatives engaged in any process involving the use or handling of any hazardous substances are given full instructions and any necessary training on the health hazards and precautions, use of protective clothing, equipment, hygiene measures etc. as required before they start using the product.

Any necessary air sampling, medical examinations, testing etc. will be carried out as required and records will be kept on site during the operations.

Managing hazardous substances and complying with the COSHH Regulations requires Total Locker Service to take the following steps to comply with the regulations:

1. Identify any substances that may be hazardous to health
2. Identify who may be harmed from the substance and how that harm may occur
3. Evaluate the risks and implement controls to reduce them to an acceptable level
4. Check and control the works to ensure that the method is being implemented properly

Total Locker Service will keep records of all assessments, data sheets and health surveillance as required. These assessments will be reviewed at regular intervals to ensure that they are up to date and still relevant.

Total Locker Service will review the situation at regular intervals to ensure that the systems are working and that they remain adequate.

Hazard Warning Symbols

Pictogram	Hazard class and hazard category:
	Explosives Self-reactive substances and mixtures, Types A,B
	Flammable gases, materials and aerosols
	Oxidizers
	Gases under pressure: - Compressed gases - Liquefied gases - Refrigerated liquefied gases - Dissolved gases
	Corrosives
	Acute toxicity (oral, dermal, inhalation)
	Skin irritation Eye irritation Skin sensitisation
	Respiratory sensitisation Carcinogens Reproductive toxicity
	Hazardous to the environment

Health Surveillance

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Total Locker Service will ensure that all employees are provided with health surveillance if deemed appropriate, due to hazards identified our risk assessments. The primary objective of health surveillance will be to detect adverse health effects at an early stage, enabling further harm to be prevented. Once it has been decided that health surveillance is appropriate, it will be maintained during the employees employment unless the risk to which the worker is exposed and associated health effects are short term. Surveillance will, where applicable, include:

- Completion of an employee health declaration document.
- Inspections of readily detectable conditions by a competent person. Health assessments will include at least the following:
 - Hearing checks
 - Checks for hand-arm vibration syndrome
 - Lung function assessments
 - Dermatitis assessments
- Enquiries about symptoms, inspection and examination by a qualified person
- Additional medical surveillance on advice following the initial assessment, which may include clinical examinations.

Health surveillance will be recorded on individual records and kept for 40 years.

Incidents (Accidents and Near Misses)

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Definitions:

An accident – Total Locker Service defines an accident as any unplanned, unwanted event that has led to personal injury.

A near miss - Total Locker Service defines a near miss as any unplanned unwanted event that could have caused personal injury (including, but not always requiring, property damage)

All accidents and near misses at our workplaces will be reported by the supervisor on the Incident Report Form and sent to the office.

All incidents likely to be reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) are to be reported to the Health and Safety Executive via <http://www.hse.gov.uk/riddor/report.htm>

All incidents can be reported online but a telephone service is also provided for reporting fatal/specified, and major incidents only - call the Incident Contact Centre on 0345 300 9923 (opening hours Monday to Friday 8.30 am to 5 pm). The HSE and local authority enforcement officers are not an emergency service.

An accident book will be available and maintained at each office or place of work to ensure any injured employee can record details of his/her accident.

All accidents deemed to be significant must be investigated by Total Locker Service with the assistance of SHE Management (UK) Ltd as appropriate.

Workplace Monitoring

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Total Locker Service will measure what we are doing to implement our health and safety policies in order to assess how effectively we are developing a positive health and safety culture. SHE Management (UK) Ltd has been employed to carry out workplace monitoring and their services, where requested, include:

- Carrying out routine inspections and checks to ensure that preventive and protective measures are in place and effective. These checks are recorded and a management plan developed.
- Adequately investigating the immediate and underlying causes of incidents and accidents to ensure that remedial action is taken, lessons are learnt and longer term objectives are introduced. A management report is produced and reviewed with a view to implementing recommended control measures.

Manual Handling

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Where reasonably practicable, Total Locker Service will avoid hazardous manual handling operations. If any hazardous operations cannot be avoided we shall assess the risks posed by evaluating relevant risk factors. Elements affecting the risk of injury include:

- Load factors such as size, weight, rigidity, movement, centre of gravity, shape and surface factors.
- Task factors such as duration, repetition and the requirement to make awkward bending or twisting movements.
- Environmental factors such as route length, lighting, obstruction, weather effects, floor surfaces and distractions.
- Individual factors such as health, level of training, mobility and pre-existing injuries.
- Ensure that risks from manual handling are reduced to an acceptable level.

Total Locker Service will ensure that all operatives have been instructed in the correct handling and lifting of loads, as required, and will also ensure that a supply of suitable gloves or other personal protective equipment is available for use for the handling of materials which could cause injuries.

Total Locker Service will ensure that all persons on site wear safety footwear and the Works Supervisor will caution any sub-contractor employees wearing unsuitable footwear.

Total Locker Service does not require any operative to lift a load the operative considers likely to cause injury.

Control of Noise

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Total Locker Service will ensure that suppliers noise data is assessed using the HSE noise calculator when planning any job.

Total Locker Service will use the HSE accepted method of on-site noise assessment – the 2 metre rule. That is to say where persons cannot communicate effectively at a distance of 2 metres or more, a site based noise assessment is required. The safe system of work to be adopted whenever noise is a potential problem is:

- Contact SHE Management (UK) Ltd to carry out a site specific noise assessment to establish levels and frequencies of noise for individual items of plant and machinery
- Consider if works can be re-programmed when the noise problem will no longer be present
- Consider alternative methods of working
- Provide suitable noise control mechanisms and personnel protective equipment
- Ensure suitable warning notices are clearly displayed around the affected area
- Regularly monitor noise levels
- Give advice on noise control measures

Where personnel are required to work in situations where high levels of noise are likely to be encountered, Total Locker Service will ensure that full information is obtained on the levels of noise. Any measures to reduce noise levels to below levels considered to be safe must be planned or, if this course is not practicable, suitable hearing protection equipment must be identified and provided for use by site personnel.

SHE Management (UK) Ltd will carry out regular monitoring of noise levels as requested by Total Locker Service.

Instruction and training will be provided to supervisors and operatives required to work in premises, or with plant, which is likely to result in exposure to high noise levels.

The Works Supervisor will ensure that supplies of ear defenders, or other hearing protection, are made available for any operations where it is not practicable to reduce the noise level to a safe limit. These will be issued to operatives as required and must be worn at all times when an operative is exposed to noise.

Permit to Work Procedures

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Introduction

A Permit to Work system will be implemented whenever work has to be undertaken that involves special or particular levels of hazard and risk and additional levels of management control. Examples of the types of work that will be covered by a Permit to Work are as follows:

- Hot works such as welding or use of any tools creating sparks in areas where combustibles are present

Limitations of Permits to Work

The issue of a Permit to Work does not in itself guarantee safety, it merely documents and communicates the hazards and risks identified and the precautionary measures that have been taken in order to minimise risk. Permit to Work procedures are only as good as the people operating them and the people supervising them. It is crucial therefore that supervisors:

- Are competent persons
- Ensure that every person on the site understands where permits are required
- Carry out regular checks to verify that the conditions specified by Permits are being maintained
- Rigorously enforce Permits and discipline anyone not meeting the requirements of a Permit

A standard form will be used for the issue of all Permits to Work unless there is a specific requirement from our client.

Personal Protective Equipment

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As part of our general risk assessment policy, Total Locker Service will try to reduce risks to an acceptable level without having to resort to Personal Protective Equipment (PPE). There are, however, times when PPE is the only reasonable solution to reducing risk to our employees. Where this is the case and before work starts, Total Locker Service will ensure that adequate supplies of all necessary protective clothing, or equipment is available on site for issue, as required, and that when issued to employees a record is kept. Total Locker Service will also ensure that satisfactory facilities are provided for the storage and where appropriate, the drying of all protective clothing and equipment.

The Works Supervisor will ensure that when sub-contractors employees are set to work they have been provided with any necessary protective clothing and equipment.

Any person on site observed carrying out any process which requires the use of protective clothing, or equipment, will be informed of statutory and/or company policy requirements and instructed not to continue working until protective clothing and/or equipment is obtained.

Those persons issuing protective clothing, or equipment, will ensure that it is suitable for the specific process for which it is provided.

All supervisory and management staff will set a good example and will use all protective clothing and equipment where required.

All persons issued with protective clothing, or equipment are responsible for maintaining it in a satisfactory condition and must immediately report to their Supervisor any loss or defect in the equipment.

Health and Safety Induction and Training

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All staff shall receive appropriate training in their responsibilities as defined in this policy. Training will be updated at regular intervals and whenever changes in legislation or working methods require. Whilst appropriate qualifications are required by Total Locker Service before employment begins, it is not accepted that training will cease for that employee. This policy requires all employees to continue training during the course of their employment.

Total Locker Service will provide such staff training as is appropriate and necessary for the requirements of their duties. All training will be mandatory with records of any training being kept. Employees are encouraged to enquire about suitable training where they feel it would be beneficial.

Where necessary, toolbox talks will be completed and attendance will be recorded.

An induction form will be completed after an employee has been engaged. We will compile and keep up to date a training matrix that will assist in managing the training process. A training attendance register will be completed for all training.

Sub-contractors are required to demonstrate that their employees have undergone similar appropriate training and are competent to undertake the specific work.

Control of Vibration at Work

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There are two main forms of vibration hazard which can affect people at work, they are:

Hand-arm Vibration (HAV) – Hand transmitted vibration from tools, equipment and certain processes that produce vibration.

Whole Body Vibration (WBV) – Vibration that is transmitted to the body through the seat of the plant or the feet of the operative.

All activities which may place operatives at risk of exposure to vibration will be assessed through our risk assessment process utilising the HSE vibration calculator.

Controlling the risk where applicable

The risk of permanent damage depends on a number of factors including:

For HAV:

- How high the vibration levels are.
- How long the equipment is used for.
- How awkward the equipment is to use.
- How tightly the equipment is gripped.
- How cold or wet the operative gets using the equipment.

For WBV consideration should also be given to:

- Operative's posture.
- The design of the controls.
- The driver visibility.
- Handling and lifting operations associated with machine's operation.
- Personal factors i.e. level of fitness, etc.

The risk assessment will consider the following hierarchy:

Elimination – Seeking alternative ways of carrying out the task **without** using high vibration tools.

Reduction – several methods should be employed, including:

- making sure that all new tools have vibration control built in;
- modifying existing tools to reduce vibration levels or the grip force needed;
- use of the right tools for the job;

- limiting the usage time to those recommended by the manufacturer or supplier;
- keeping all tools and machines in good working order;
- not using more force than necessary when using tools and machines;
- personal factors like cutting down on smoking (smoking affects blood flow);
- Exercising hands and fingers to improve blood flow.

Isolation – Job rotation.

Control – methods include:

- information, instruction and training in the correct use of tools and equipment;
- method statement and safe systems of work briefings;
- recognition of early symptoms of injury;
- arranging advice and routine health checks if the use of high vibration tools is unavoidable;
- Assessing exposure levels; keeping warm and dry; use of anti-vibration PPE.

SHE Management (UK) Ltd will carry out regular monitoring of vibration levels as required and where requested by Total Locker Service.

Instruction and training will be provided to supervisors and operatives required to work in premises, or with plant, which is likely to result in exposure to high vibration levels.

Work at Height

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Total Locker Service will comply with its duties under the Work at Height Regulations 2005 (WAHR), as part of its risk assessment procedures. All work at height will be thoroughly assessed and alternatives to working at height will always be considered. The use of ladders for any work at height will only be considered where other more suitable work equipment is not appropriate.

The hierarchy of control measures we will consider will be:

- Avoid work at height
- Use an existing safe place of work that prevents falls
- Use work equipment that prevents any fall
- Use work equipment to minimise the distance and consequences of a fall
- Provide additional training and instruction or other suitable measures

The above hierarchy will be considered during the preparation of risk assessments and method statements to ensure that safe systems of work are established and implemented. Other factors such as the location and duration of the work; the weather conditions; the task to be carried out and the experience and competence of the individual will also be taken into consideration.

Work Equipment (PUWER) and Lifting Equipment (LOLER)

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Total Locker Service will ensure that all work equipment that we use is:

- Assessed as being suitable for its intended purpose and the environment in which it is used.
- Provided with adequate guards to protect the operator from hazards whilst using the machinery
- Suitably maintained in accordance with any legal requirement and the manufacturer's instructions. This maintenance will include inspections as are necessary and will be carried out by a competent person and recorded.
- Operated by trained and authorised operatives. Training records will be held at our offices.

Lifting Equipment

All lifting operations involving lifting equipment will be properly planned by a competent person, appropriately supervised and carried out in a safe manner.

We will ensure that the equipment used is of adequate strength to lift the required load and that it will remain stable throughout the operation.

Where appropriate, a lift plan will be developed and approved prior to any lifting operation being carried out.

We will ensure that any equipment used for lifting persons will be suitable and emergency procedures will be in place should the lifting equipment fail and lead to a person being trapped. We will ensure that there is a suitable means of communicating with any person being lifted by a lifting operation.

We will also ensure that all equipment used for lifting is fit for purpose, appropriate for the task, suitably marked and, where applicable, subject to statutory periodic '[thorough examination](#)'.

All lifting equipment and accessories will be visually inspected daily and their condition recorded weekly. All damaged equipment will not be allowed to be used and removed from site for repair and re-testing or disposal. Records will be kept of all thorough examinations and any defects found will be reported to both the person responsible for the equipment and the relevant enforcing authority.

During all lifting operations all personnel not directly involved with the lifting process will be required to stand clear of the working area.

Work Related Driving

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Total Locker Service considers work related driving to be a significant hazard. We have developed procedures to ensure compliance with HSE guidance by:

- Ensuring that driving licences are checked when a person is employed and their employment will involve driving as part of their work activities.
- Checking insurance documents to establish whether business travel is included where relevant.
- Ensuring our induction procedures will cover work related driving and the key areas assessed such as competency of the driver, further training that may be required, fitness and health of drivers, vehicle suitability, safety equipment provided by the company and any safety critical information. In addition to this information on route planning, scheduling, time distance and driving in adverse weather are discussed to raise awareness of the associated dangers.
- Ensuring that all those personnel required to drive for work sign up to a Work Related Road Risk (WRRR) contract which will detail the minimum requirements we would expect.