



# Health and Safety Policy

Revision	Date	Details of Change
1	2008	Original
2	Sept 2012	Major review by MD / ASM / General Employees
3	Sept 2013	Policy reviewed - sections on drugs, alcohol & smoking & electrical safety added
4	Sept 2014	Annual review completed no changes required
5	Sept 2015	Planned Annual Review
6	April 2016	Annual Review completed – amendments made to RIDDOR reporting detail. Ladder use/inspections added to Work at Height section & DSE section added
7	June 2017	Policy reviewed, new logo added & minor wording changes made to include relevant legislation
8	June 2018	Policy Reviewed – Occupational Health Hazards section added
9	Jan 2019	Policy reviewed to bring review dates to all policies in line – H&S Policy Statement re-worded
10	Jan 2020	Policy reviewed – no changes required
11	July 2020	Policy reviewed, in light of the COVID-19 pandemic & section added
12	Jan 2021	Policy reviewed – COVID-19 section updated, in line with current guidelines
13	Jan 2022	Policy reviewed – Minor changes to COVID-19 & PPE sections.
14	March 2023	Policy reviewed. Covid-19 & Respiratory infections section amended to reflect 'Learning to live safely with Covid-19'
15	March 2024	Planned Annual Policy Review

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## Rowham Steel Products Ltd Values

- **Health & Safety number one**

Through this policy and all Rowham Steel Products Ltd operations we ensure that there is no production need, competitive advantage, cost or time saving measure that is worth an injury of any kind to any person. We must have zero tolerance of any practices that could cause accidents or ill health. We have a moral obligation to our families and each other to work safely at all times.

- **Our business is trust**

Rowham Steel Products Ltd is known as a company which is trustworthy and credible and which makes a profit honestly and correctly.

- **A very safe and reliable choice**

Rowham Steel Products Ltd is a safe and reliable supplier, which keeps its promises to its clients and delivers effective products and services.

- **Passionate about technology**

Rowham Steel Products Ltd is at the forefront of technology through a passion for technology, focusing on what it can do to improve people's quality of life.

- **Environmentally and socially responsible**

Rowham Steel Products Ltd name should – at all times – be associated with a respect for human rights, acceptable working conditions, social considerations and environmental activities to obtain continuous improvements.

## Health and Safety Policy Statement

As Managing Director, I wish to emphasise my personal commitment to ensuring that we achieve and maintain high standards of welfare, health and safety.

The company will provide and maintain safe and healthy working conditions, equipment and systems of work, along with information, instruction, training and supervision. In return it is expected that everyone will work together to prevent all accidents and work-related ill health. It is essential that we set ourselves high standards and all take personal responsibility for health and safety to promote a culture where we will not walk past unsafe practices.

Effective management of health and safety is crucial to our business. At all levels we must ensure that health and safety arrangements are clear, constantly reviewed and implemented. Formal plans for health, safety and welfare targets and improvements are in place and monitored. The involvement of employees in our health and safety effort is fundamental and we shall ensure that effective means of consultation and communication are in place.

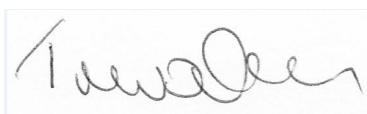
Through the implementation and continuous review of this Health and Safety Policy, we aim to minimise the risks from our operations. In return we expect all employees, visitors and other affected persons to help achieve this aim.

I accept that I have overall responsibility for health and safety and shall, so far as reasonably practicable:

- Provide a safe and healthy working environment and welfare facilities
- Ensure plant and work equipment is suitable and fit for purpose and maintained as per manufactures guidelines
- Manage health and safety risks to prevent accidents and work-related ill health by developing appropriate risk assessments and reviewing them when appropriate.
- Provide first aid where necessary and record/report accidents in line with RIDDOR 2013.
- Communicate and consult with employees on Health & Safety matters, or with others who may be affected by our work activities.
- Safely use, handle, store and transport goods and materials.
- Provide information, instruction, training and supervision for all employees under my control.

There is no production need, competitive advantage, cost or time saving measure that is worth an injury of any kind to any person. We must have zero tolerance of any practices that could cause accidents or ill health. We have a moral obligation to our families and each other to work safely at all times.

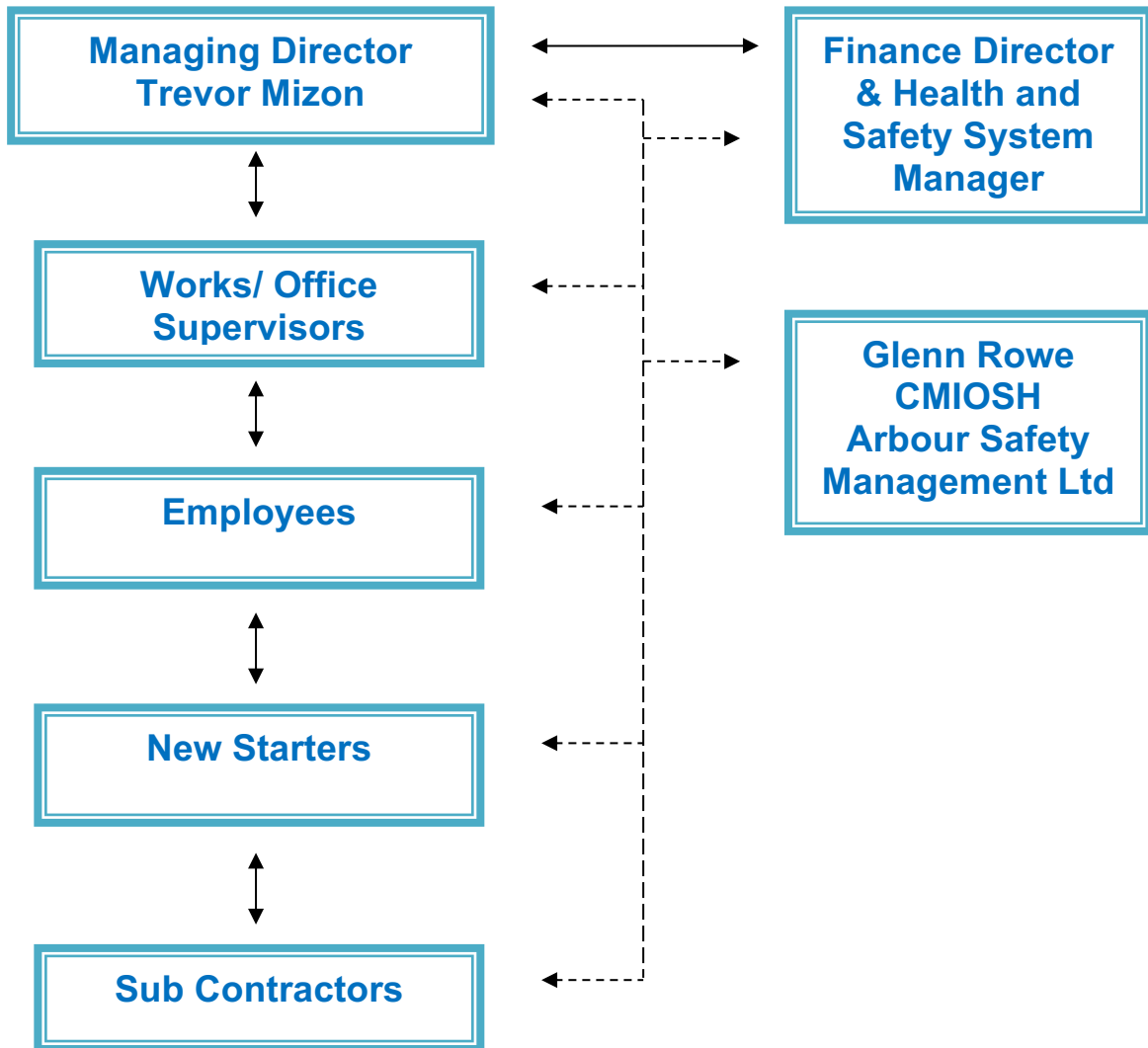
Signed



Trevor Mizon  
Managing Director

## Organisation Chart

This chart details the structure and various reporting levels within Rowham Steel Products Ltd. All parties have the ability to make contact with any level within the organisation at any time in the interests of ensuring high Health & Safety standards are maintained.



## Responsibilities for Health and Safety

### Managing Director

The Managing Director has overall responsibility for health and safety across all of Rowham Steel Products Ltd operations. He will ensure suitable competent people are in place, along with sufficient resources, to enable this Policy to be implemented fully and ensure that there is effective supervision of all workplaces. The policy will be monitored and improvements made to ensure it is effective. He shall provide clear direction and support in respect of all health and safety matters, especially covering the completion of initiatives in connection with the company's health and safety improvement plan. This will ensure that there is good communication regarding health and safety within all areas of the organisation and on client's sites. The Managing Director is responsible to ensure the Reporting of Incidents, Disease and dangerous Occurrences Regulations 2013 are complied with. ASM Ltd will advise and assist when due to the nature of any accident, incident and / or injury needs to be reported to the HSE.

In conjunction with all employees the Managing Director shall monitor this policy's requirements to ensure its effectiveness.

### Finance Director and Safety System Manager

Finance Director & Health and Safety System Manager has responsibility for implementation and on-going monitoring and support of the health and safety system across all of Rowham Steel Products Ltd operations. He will work closely with all staff and the Health and Safety Consultant to ensure the procedures and system requirements are implemented and effective.

Any concerns raised during the health and safety system elements introduction and on-going completion will be fully discussed with all affected persons, changes made and requirements communicated.

The Finance Director & Health and Safety System Manager shall provide clear direction and support in respect of the all health and safety systems, with guidance obtained from the Health and Safety Consultant as required. This will help ensure that the processes in place are suitable and effective for the hazards linked to the operations of Rowham Steel Products Ltd.

### Works/Office Supervisors

Supervisors are responsible to the Managing Director and are responsible for the implementation of this Policy. They will ensure health, safety and welfare standards are maintained by all employees, contractors and third parties working for Rowham Steel Products Ltd. They have day-to-day, first-line responsibility for the health and safety of the people under their control and shall ensure that all staff are aware of the requirements relevant to their role. They are responsible in ensuring that competent people are in place, including those required by relevant legislation, so that there is effective supervision of all workplaces.

They will adhere to the requirements of this Policy and ensure that elements of the health and safety systems are fully implemented, i.e. risk assessment, safe systems of work, inspections etc are implemented to guarantee the safe operation of site activities and equipment. They are an integral part of the communication process and shall work closely with all people under their control. They will further support and monitor the completion of the company's Health & Safety Improvement plans actions.

Supervisors will also ensure regular feedback and effective communication in respect of any points raised during on site activities and actions implemented to maintain high health and safety standards.

They shall lead by example to ensure the conditions within this policy are achieved. Where any contraventions of health and safety rules are observed they shall take immediate action to stop any poor practice. Actions to prevent a reoccurrence will be taken including a full investigation and communication to all persons of the learning points.

## Employees

Rowham Steel Products Ltd values the involvement of all employees and will encourage participation through consultation. Everyone is expected to take an active role in improving standards by, for example, reporting Near Miss's and hazards, carrying out risk assessments or undertaking inspections. It is the responsibility of everyone to comply with and enforce this policy and specific safety procedures applicable to their role. The most significant effect each of us can have on eliminating workplace accidents is by adopting a positive health and safety attitude at all times.

Everyone should demonstrate personal leadership in respect of health and safety by ensuring that they don't walk past unsafe work practices and by advising their Supervisor of any unsafe acts or conditions.

We should be aware that our acts and omissions can put others at risk and should never take short cuts that compromise safety.

## New Starters

In addition to the requirements above all new starters will be introduced and inducted with the contents of this policy. This process will run over the induction training program. Only when both the new starter and Rowham Steel Products Ltd are satisfied that the new starter is conversant with the requirements will he/she move on with specific training etc.

During induction new starters must remain extra vigilant when carrying out all tasks and raise any concern they have with health and safety practices within the work place. Assistance in this way will help us ensure that all new starters are aware of the correct manner in which tasks are to be performed, and also enable poor practices to be highlighted and actions taken to improve safety.

## Sub- contractors

All sub-contractors will adhere to this policy and formally confirm receipt, and more importantly, understanding of the requirements, when working for Rowham Steel Products Ltd. They will be expected to set an example and not walk past any unsafe work practices. They will be expected to participate in all relevant planning, site meetings, and development of risk assessments etc, ensuring high standards are maintained.

## Health & Safety Consultant

The company retains the services of Arbour Safety Management Ltd. Health & Safety support is available to all levels of Rowham Steel Products Ltd in the development of the health and safety culture and helping structure the forward plans. The aim is to influence a continuing reduction in work related accidents and ill health and monitor compliance with this policy, health and safety performance and standards. The consultant will provide a high-quality Health and Safety management resource. One of the main duties is to support the operations when preparing and completing actions arising as part of ongoing health and safety improvements.

## Arrangements for Health and Safety

### Accident / Incident Reporting & Investigation

All accidents / incidents, including road traffic accidents on the public highway, involving injury or property damage on company controlled operations, or injury to employees working away from base locations, must be reported via the standard accident reporting procedure. Near misses shall be reported via the Near Miss/Hazard Alert system which is linked to the pre-job assessment format.

All accidents and near miss incidents will be thoroughly investigated to establish not only the immediate causes but also the underlying reasons behind each event, thus determining what further precautions are required. All persons who carry out accident / incident investigations shall be trained in accident reporting, investigation and emergency procedures. Until employees have completed the training the H&S Consultant will assist in all investigations. Where the need for further control measures is identified, positive action will be taken as quickly as possible to ensure a recurrence is avoided.

In all cases when accidents, incidents or near misses / hazards are reported, dialog and feedback must be given to the person who made the report. The H&S Consultant will advise and assist when due to the nature of the accident, incident and / or injury it needs to be reported to the HSE. (i.e. RIDDOR reportable incidents)

In the event of an accident or incident which falls under the requirement to report under RIDDOR 2013, a responsible person (Managing Director) shall notify, by the quickest practicable means (online at [www.hse.gov](http://www.hse.gov)) the enforcing authorities, with the exception of fatal & specified injuries, which shall be reported by telephone on 0345 300 9923 between the hours of Mon – Friday 08.30 – 17.00. An out of hours reporting system is available for more serious instances by telephoning the HSE Duty Officer on 0151 922 9235.

Records of any accidents, incidents or dangerous occurrence which requires reporting under RIDDOR & any other occupational accident causing injuries that result in a worker being absent from work or incapacitated for more than 3 consecutive days will be documented & maintained. Further details can be found in the HSE leaflet INDG453.

Similarly, near miss incidents will also be documented.

Statistical information will be developed to help identify trends and enable additional control measures to be introduced that minimise the risk of further incidents. A simple accident, incident and near miss and hazard alert analysis shall be completed with the outcome posted to suit.

### Code of Conduct

All staff and contractors engaged by Rowham Steel Products Ltd shall be trained and acknowledge receipt of the code of conduct. This code shall be followed at all times. It details the minimum requirements when working for Rowham Steel Products Ltd, as an employee and contractor

### Company Meetings and Reports

Health and Safety shall be the first agenda item at all company meetings. This will provide an opportunity to discuss health and safety alongside other business matters, ensuring that policy decisions are made that best suit the business.



## Consultation with Employees

It is important that the health and safety interests of all employees are represented. Currently, briefing sessions/toolbox talks are held, where staff have opportunity to raise health and safety concerns. These briefings have always encouraged positive consultation with all worker groups. The Company operates an 'Open Door Policy' & all staff have a number of opportunities on a weekly basis to raise health and safety concerns. A more regular meeting structure is planned for 2023.

## Control of Contractors

Contractors are employed to undertake inspections/repairs on machinery. To ensure all contractors operate to both legal and Rowham Steel Products Ltd standards an approved List of contractors shall be maintained. Contractors will only be included on the approved list when they have provided sufficient information demonstrating their competence, their work meets expected standards and staff act in a safe manner. The information requested includes proof of any relevant insurance, staff competence, risk assessments etc. Information used to justify inclusion on the list is retained and formally reviewed at least annually, at the time of the contractor's insurance renewal.

Where contractors fail to demonstrate safe working practices they will be withdrawn from the approved list and their services no longer employed until they can formally guarantee safe working practices.

Before starting work, contractors will receive an appropriate period of induction to ensure that all relevant health and safety requirements are addressed. Depending on the contractor's level of experience, the task to be completed, the knowledge of the contractor etc they may be required to complete a Rowham Steel Products Ltd Permit to Work.

## Control of Substances Hazardous to Health

The company acknowledges its obligations to control exposure to hazardous substances and prevent ill health by complying with the Control of Substances Hazardous to Health Regulations 2002 (COSHH).

Rowham Steel Products Ltd maintains a register and Material Data Sheets of all hazardous substances used during any work process.

The Managing Director is responsible for identifying all substances which require a COSHH assessment. All harmful substances used in the operations undertaken by Rowham Steel Products Ltd are subject to a COSHH assessment, prior to their use, and the assessment is reviewed by those who handle/use the substances, under the guidance of The Managing Director, and following full instruction and training.

The assessment process shall take into consideration storage, handling, usage, exposure, PPE requirements, employee's health and emergency procedures.

Wherever possible, harmful substances are replaced by alternative less harmful, inert products. All staff shall receive information, instruction, training and supervision and be trained in the precautions required when handling potentially harmful substances. If it is necessary for employees to wear PPE, full instruction in its use shall be given (See separate section covering PPE within this Policy)

The register, along with Data sheets are held at head office.

Some substances that the company use could give rise to skin irritation. The company therefore carries out training sessions to highlight the importance of skin hygiene, the requirement to follow all instructions on the supplied MSDS sheets & accompanying COSHH Assessments & the requirement to wear the appropriate PPE.

Contact dermatitis is the most common type of occupational skin disease. It is defined as inflammation of the skin resulting from exposure to detergents, toiletries, chemicals and even natural products. Prolonged or frequent contact with water (often termed wet work) can also cause it.

The signs and symptoms of dermatitis are dry, red and itchy skin, followed by flaking, blistering, crusting, cracking, swelling and pain.

Rowham Steel Products Ltd operate the following procedures to prevent dermatitis:

Use the APC (**Avoid, Protect, Check**) approach to reduce or control the risks:

- **Avoid** contact with materials that cause these conditions where possible – substitute by replacing a hazardous material with a safer alternative or use mechanical handling rather than hands.
- **Protect** the skin – wear the correct PPE & make use of barrier creams. Store PPE correctly & replace as necessary.
- **Check** for early signs of dermatitis & report any symptoms immediately.
- **Attend briefings & daily meetings** – and follow controls on risk assessments.

### COVID-19 & Respiratory Infections

There is no doubt the impact that coronavirus (COVID-19) has had on businesses around the world, and our company is no different. The Company joins all other organisations in the UK and globally in recognising they have a part to play in reducing the spread of respiratory infections, as we learn to live safely with Covid-19.

We continue to maintain the health and safety of our employees and any other person who comes into contact with our operations. We will continue to follow the UK Government's advice to ensure we manage the risks that respiratory infections such as COVID-19 and flu places on us as a business.

The company put in place systems to protect our employees and to prevent the spread of covid-19 virus during the pandemic. We consider it sensible to continue to educate our workforce to prevent the spread of any respiratory infection and will:

- Promote covid-19 vaccination
- Maintain good ventilation by letting fresh air in
- Maintain a clean workplace
- Manage any outbreak of respiratory infections.

### Display Screen Equipment

Rowham Steel Products Ltd shall comply with the requirements of The Health and Safety (Display Screen Equipment) Regulations 1992 (amended 2002). It is the Company's intention to provide a safe and healthy working environment for employees, including particular measures to protect their health and safety when they are working with Display Screen Equipment (DSE). The Company will fulfil its obligations by undertaking the assessment of work stations, the provision of suitable work equipment, the provision of information, instruction and training for users of such equipment, the provision of eye and eyesight testing for users, and the provision of spectacles (where these are required solely and specifically for DSE work) & making arrangements for regular breaks for employees working with DSE.

### Drugs, Alcohol & Smoking

All staff will be made aware of the content of the Drug & Alcohol Policy. The Policy is designed to promote a culture in which drug and alcohol abuse is eliminated, thus ensuring the safe and efficient running of the business and reducing the risk to the health and safety of employees or third parties. Rowham Steel Ltd does not permit smoking on company premises, in company vehicles or on client premises.

## Electrical Work

Rowham Steel Ltd shall comply with The Electricity at Work Regulations 1989 and all electrical work carried out shall be undertaken by trained, competent personnel.

All portable electrical equipment shall be identified on an Electrical Equipment Register and shall undergo 6 - 12monthly PAT Testing. Records shall be maintained. All tool voltage will be reduced to 110v or battery powered tools will be used wherever possible. All staff shall receive information, instruction, training and supervision in pre-user checks of electrical equipment.

## Emergency Procedures & First Aid

Risk assessments for the company's operations must consider potential emergency situations and be used to determine the range and extent of emergency plans required for the company's undertakings.

Emergency procedures are in place and are designed to assist people in responding quickly and efficiently should any serious incident occur. Risk assessments and emergency procedures shall be used to determine the requirements for emergency drills and specific training.

The company recognises its obligations under the Health & Safety (First Aid) Regulations 1981 and understands that the provision of suitable first aid provision & training may reduce the impact of an accident. Appropriate first aid provision shall be in place at all times. First aider location shall be communicated through the general notice board, inductions and during meetings. The content of all first aid boxes shall be checked weekly.

## Fire Prevention

Through the risk assessment process, a generic fire risk assessment shall be completed which will detail general fire prevention activities. Relevant staff shall be trained with the detail of the risk assessment. During periods of hot work employees and contractors will comply with the hot work procedures preventative measures at all times.

## Health Care and Monitoring

The company operates a health surveillance programme. Screening for HAVS, lung function, Skin checks, audiology & eye health commenced in 2015 to gather baseline recordings. This was repeated in 2017 & thereafter 2 yearly unless individuals require more frequent monitoring / referral.

Additionally, a health questionnaire is completed by all new employees prior to them commencing work. The questionnaires are reviewed to ensure the new employees general state of health does not put their safety at risk or put others in danger.

Some substances that the company use could give rise to skin irritation. The company therefore carries out training sessions to highlight the importance of skin hygiene, the requirement to follow all instructions on the supplied MSDS sheets & accompanying COSHH Assessments & the requirement to wear the appropriate PPE.

All staff will be made aware of the content of the Drug & Alcohol Policy. The Policy is designed to promote a culture in which drug and alcohol abuse is discouraged and to ensure that employees' use of either drugs or alcohol does not impair the safe and efficient running of the business or result in risk to the health and safety of themselves, other employees, or third parties.

In line with the scheme of inspection process, equipment which could create a potential of harm to health will be inspected and reviewed in line with the manufacture's recommendations and statutory requirements.

This will include health concerns related to noise, fumes and vibration. Engineering methods will be implemented to reduce levels below statutory limits where possible. Where levels still pose a hazard to health, warning signs will be

posted, job rotation implemented if practicable and personal protective equipment will be issued and its use enforced, to protect any person using the machinery and/or persons in the vicinity from harm.

During the replacement of any machinery and tools both the noise, energy and vibration levels will be considered during the purchasing process. This will help reduce levels for future purchases and limit exposure to employees.

### Health and Safety Information

Relevant Health & Safety information is circulated to all employees. Our Consultant will ensure suitable items are brought to the company's attention, with any relevant advice included. This service will also include relevant information covering new health and safety legislation.

The Managing Director, Finance Director & Health and Safety System Manager will ensure that all relevant health and safety information is circulated to employees and where required formal confirmation of understanding will be obtained. Information and training will be given to ensure full understanding is achieved to help them understand and discharge their responsibilities under relevant legislation.

### Inspections, Monitoring, Audits and Defect Reporting

A framework of maintenance and inspection schemes, to monitor health and safety standards and promote preventative maintenance, has been implemented. The extent of the scheme is dependent upon the equipment, the hazards & level of risk and statutory requirements e.g. Provision and Use of Work Equipment Regulations. The scheme includes any statutory inspections and covers a variety of areas (e.g. electrical wiring, fire extinguishers, portable appliance testing, Forklift Truck inspections, vehicle inspections, crane inspections etc.) The exact scope and frequency of inspections is determined and documented in the formal written scheme.

The scheme is reviewed periodically to ensure that all items remain comprehensive and effective. Inspections are carried out by people who are competent by virtue of their training and experience.

Records are kept detailing items listed on the various registers and frequency of inspection, together with plans for the remedial work to be carried out.

The company is committed to a system of inspections, monitoring and reviews. Safety Inspections & reviews are carried out at regular intervals to ensure safe working practices are being adhered to.

The H&S Consultant will undertake spot inspections, as requested. A detailed report will be completed with actions monitored through Rowham Steel Products Ltd management structure.

### Lifting Equipment

The company recognises its obligations to comply with the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) and employs an external assessor to ensure that all lifting appliances and lifting gear / accessories are properly maintained / inspected, marked with an identification number and safe working load. Records are maintained accordingly.

### Manual Handling

The manual Handling Operations Regulations 1992 require the company to:

1. AVOID manual handling operations so far as is reasonably practicable.
2. ASSESS the risks from any hazardous manual handling that cannot be avoided.
3. REDUCE the risk of injury from hazardous manual handling, so far as is reasonably practical, by the introduction of control measures.

The Managing Director is responsible for identifying manual handling operations and assessing all significant risks to employees. Measures are implemented to eliminate manual handling operations where practicable and any remaining risks are reduced to their lowest level, by the introduction of control measures. These include; reducing weights, reducing the frequency of handling loads, increasing the numbers of employees to handle loads, automating or mechanising the activity and by the selection of appropriate persons to carry out the activity. Appropriate employees are those who have received appropriate training, are competent and possess the physical attributes in terms of age, physique and health to undertake the task.

All employees shall receive information, instruction, training and supervision in manual handling tasks. The training shall cover the requirement of employees to consider the TILE approach to assessing risks associated with manual handling activities. TASK (eg. Repetitive handling, moving loads to/from different levels etc) INDIVIDUAL (eg. age, gender, physical capability, existing medical conditions, level of training etc), LOAD (eg. Size, shape, bulky, stable etc), ENVIRONMENT (eg. Floor surface, cramped conditions, housekeeping, route etc)

Training shall also include avoiding moving heavy loads manually, and also cover kinetic lifting techniques (i.e. using the body's natural movements to the advantage of manual handling operations) and the use of appropriate PPE.

Prior to moving any load, Rowham Steel Products Ltd expects that all employees carry out a Manual Handling Assessment of the risks to themselves & others, from manual handling of loads.

## Occupational Health Hazards

It is the company's intention to provide a workplace which is free from occupational hazards.

All employees are asked to complete a Health Questionnaire, on commencement of employment with the company. This is to ensure that the employees state of health cannot be adversely affected by undertaking their expected work activities.

The company operates a health surveillance programme. Screening for HAVS, lung function, Skin checks, audiology & eye health commenced in 2015 to gather baseline recordings. This was repeated in 2017 & thereafter 2yearly unless individuals require more frequent monitoring / referral.

Through the risk assessment process, the company will determine whether occupational health hazards are present. If so, then controls would be instigated to eliminate / reduce potential adverse health effect to employees.

### Health Hazards

- **Noise** – Factory employees are exposed to noise. Personal noise monitoring has been undertaken and improvements instigated as well as the use of mandatory hearing protection. Audiology screening is also undertaken as part of the health surveillance programme.
- **Vibration** – No vibratory tools are used and therefore HAVS is not identified as being a risk to our employees.
- **Respiratory** – No exposure
- **Dermatitis** – Employees occasionally exposed to substances that could give rise to skin irritation. The company therefore carries out training sessions to highlight the importance of skin hygiene, the requirement to follow all instructions on the supplied MSDS sheets & accompanying COSHH Assessments & the requirement to wear the appropriate PPE.  
Contact dermatitis is the most common type of occupational skin disease. It is defined as inflammation of the skin resulting from exposure to detergents, toiletries, chemicals and even natural products. Prolonged or frequent contact with water (often termed wet work) can also cause it.

The signs and symptoms of dermatitis are dry, red and itchy skin, followed by flaking, blistering, crusting, cracking, swelling and pain.

The company operates the following procedures to prevent dermatitis.

Use the APC (**Avoid, Protect, Check**) approach to reduce or control the risks:

**Avoid** contact with materials that cause these conditions where possible – substitute by replacing a hazardous material with a safer alternative or use mechanical handling rather than hands.

**Protect** the skin – wear the correct PPE & make use of barrier creams. Store PPE correctly & replace as necessary.

**Check** for early signs of dermatitis & report any symptoms immediately.

**Attend briefings & daily meetings** – and follow controls on risk assessments.

- **Working hours / shift work** – Employees do not work excessive hours or work shift work.

### Permit to work

To ensure high standards of health and safety are maintained during specific high risk activities, permits to work will be completed, involving all relevant employees and if required reference will be made to associated SSOW and Risk Assessments. Rowham Steel Products Ltd Permit to Work forms will be completed prior to work commencing. Those who are involved with the issue of permits will have completed suitable training to ensure the process is fully completed.

### Personal Protective Equipment (PPE)

The Company acknowledges its obligations under the Personal Protective Equipment at Work Regulations 1992 and seeks to ensure that where the risks cannot be controlled by other means, personal protective equipment (PPE) is correctly selected and used.

All necessary items of protective equipment are supplied to both employees, agency workers & LIMB workers, and their use enforced. A core list of standard PPE has been developed from employee consultation to endeavour to provide the best possible and most suitable equipment for the hazards connected to Rowham Steel Products Ltd operations. During the assessment and selection of PPE consideration is given to the engineering measures to negate the need for PPE. Where this is not possible training in use, maintenance procedures, storage arrangements and the replacement procedure for damaged and/or worn equipment is clearly explained.

Records of PPE issue along with training, maintenance, storage and replacement are maintained.

### Planning for Improvements

Health and safety planning is critical in improving standards / business performance and driving down accident rates. During the regular review of Risk Assessments, plans for continual improvement are identified and closed out in a timely manner. The improvements are discussed with employees and where relevant, agency and LIMB workers. The Managing Director is responsible for ensuring that the improvement items are adequately resourced and shall monitor progress on a monthly basis.



Items listed on the health and safety improvement plan shall also arise from risk assessments, audits, inspections, near miss reporting, etc. The plan will include clear objectives, targets and aims to minimise hazards, control risks and reduce accident rates on an ongoing basis.

New statutory requirements will be considered during the planning process.

## Risk Assessments

The company understands that the most important tool in managing health and safety is risk assessment and follows the 5-stage approach to managing risk:

1. Identify the hazards.
2. Identify who could be harmed and how.
3. Evaluate the risk.
4. Record significant findings.
5. Monitor & review the risk assessment.

All levels within the business will be involved in the risk assessment process, covering all relevant activities. Assessments will cover all generic and contract specific hazards with associated risks identified and subsequent control measures being suitable and sufficient. All employees will receive a short introduction to hazard identification and risk assessment.

The assessment process will include the review of all relevant statutory requirements, i.e. Noise, Vibration, Working at Height, Manual Handling (where ever possible manual handling must be avoided and/or mechanical devices used to limit handling injuries, more information is contained within specific risk assessments and manual handling procedure) etc. and also cover particular hazards associated with Rowham Steel Products Ltd. e.g. dermatitis, cuts from steel, handling loads, vehicles, deliveries, process machinery etc.

The company operates a CoSHH assessment process linked to the general risk assessments. (See above)

Completed risk assessment forms, including significant findings, will be brought to the attention of all relevant people, including contractors, through discussions at health and safety meetings and informal discussions with all affected parties.

Risk assessments shall be reviewed if there is any reason to suspect that the original assessment is no longer valid, such as a change in process, staff, working conditions etc. or following an accident or reported near miss / hazard alert. In addition they shall be formally reviewed at least every 12 months.

All persons involved in the risk assessment process will formally confirm their involvement on the individual assessment sheets.

Prior to undertaking a new task or one that has not been completed recently, relevant generic assessments will be reviewed and where required, specific assessments created with the involvement of all relevant staff, contractors and our health and safety consultant as appropriate.

## Health & Safety Standards, Safe Systems of Work (SSOW) and Procedures for operation

Health & Safety standards, SSOW and Procedures covering key hazard areas are being generated. They are being compiled following full consultation and involving all relevant employees and contractors and will identify the expected performance requirements when working for Rowham Steel Products Ltd. All of the key tasks and operations are being included, i.e. machinery, cranes/lifting, lifting and handling loads, health hazards, deliveries, vehicles, working at height etc. Confirmation of involvement shall be recorded on each document.

## Statutory Duties & Inspections

Rowham Steel Products Ltd shall comply with all relevant statutory duties and inspections. The full register of requirements is in place and continually monitored, ensuring all items and areas are covered. The register includes time scales to ensure maximum time periods are not exceeded and that items identified from inspections are closed out and signed off.

## Stress Management

Stress management is a key concern within business. It is Rowham Steel Products Ltd intention not to create work patterns that have the potential to create stressful circumstances. If, however situations arise which cause concerns, e.g. pressures of work, home life issues etc, this should be discussed with Trevor Mizon. All instances will be treated with the utmost confidentiality and assistance will be given where required.

## Training

**On Induction** - All new employees, including temporary and agency staff, will receive safety training to ensure safe methods of working are adopted at all times. Training will commence on day one and will consist of a formal written programme that takes into account the individual needs of the employee and the specific job role.

The duration of the induction training programme will vary dependent on the individual and the complexity of the tasks. The duration will be sufficient to ensure that the employee or others are not put at risk. In particular, specific requirements shall be put in place where young and inexperienced employees are recruited. After a predetermined period, the induction shall be formally reviewed and assessed, to ensure full understanding of procedures and areas/items discussed.

**Ongoing Training** - Training needs for all personnel shall be formally identified on an individual training matrix and reviewed on an annual basis. Training and development programmes will help ensure that all employees are competent for their job role.

Up to date training records shall be kept which shall also include details of National Vocational Qualifications and other competency-based assessments as required.

**Specific Training** - Where required, specific training will be given along with a period of assessment to ensure competence, i.e. first aid, etc. Only when employees have successfully completed the program will they be deemed competent and certificated accordingly.

## Transport, Driving & Mobile Phones

Rowham Steel Products Ltd provide suitable vehicles to be used on company business. All employees who drive company vehicles will be asked to provide proof and a copy taken every 6 months of their driving licence.

Mobile phones shall not be used whilst driving any Rowham Steel Products Ltd vehicle, (whether answering / making calls, text messaging etc), unless using an approved hand free system and then conversations must be kept to a minimum. People making calls to mobile phones are responsible for encouraging compliance with these Standards by checking in the first instance that it is safe for the driver to receive the call. This prohibited use of mobile phones also extends while operating hazardous equipment, machinery & Forklift Trucks.



## Welfare

In accordance with the requirements of the Workplace (Health, Safety and Welfare) Regulations, the company will provide workplaces with adequate provision for ventilation, temperature, lighting, sanitary conveniences and washing facilities. These facilities will be maintained in a clean and tidy condition, although it is everybody's responsibility to aid the cleaning process by not leaving areas in a condition they would not expect themselves.

## Work Equipment

All work equipment (including electrical equipment) used at work, as part of the Company's undertaking will comply with the Provision and Use of Work Equipment Regulations 1998, the Electricity at Work Regulations 1989, The Lifting Operations and Lifting Equipment Regulations 1998 and other relevant legislation.

Before new equipment is introduced into the working environment, an assessment will be made by the Managing Director along with the staff using the equipment in order to ascertain that the equipment is suitable for its intended use.

The Managing Director will ensure that proper maintenance of all work equipment is conducted and recorded in line with the scheme of Inspection and no employee will use work equipment until they have received specific training. Training shall include the instruction that any guarded equipment shall not be used without the guards being in place, that pre-use checks will be performed on all portable electrical equipment and no employee will knowingly misuse work equipment.

All work equipment shall be maintained and inspected at suitable intervals internally by a competent person as detailed within the scheme of inspection. All inspections will be formally recorded in line with the schemes requirements.

All portable electrical equipment is suitable for the task to be performed and is inspected and tested by a competent person. Details are recorded in line with the scheme of Inspection.

If any faults or damage is found on any equipment, the equipment must be immediately withdrawn from service and the fault reported to a Supervisor

## Working at Height

If work cannot be carried out safely from ground level, then suitable access equipment will be utilised. All work to be carried out at height will be in full compliance with the relevant method statements / risk assessments and in line with best practice, limiting injury from falls. Training will be completed for all staff using access equipment prior to the respective employee using the equipment.

The Company does own ladders for short duration works & access to fixed locations within the workshop. All ladders are subject to pre-user checks & 6 monthly formal documented inspections. When not in use, ladders are stored in a locked location, with the Workshop Supervisor only having access. A ladder / access register is also maintained.

The following seven steps will be followed during surveys and pre job assessments where working at height cannot be avoided.

Safe Work at Height - seven steps

1. Assess the risk and decide how to work safely.
2. Follow the hierarchy for safe work at height
  - (i) Avoid (e.g. design out the need to work at height; work from ground level using extending poles)
  - (ii) Prevent by using an existing place of work at height (e.g. a permanent structure such as a flat roof)
  - (iii) Mitigate by minimising the distance and consequences of a fall.
  - (iv) Give priority to collective protective measures which protect more than one person (e.g. tower scaffolds, Mobile Elevating Work Platforms)

(v) Prevent the risk of falls using personal work equipment (e.g. work restraint Systems which make it impossible to get to a fall position shall be given priority over fall arrest systems which do not prevent a fall but minimise the consequences)

3. Plan and organise work properly, taking account of weather conditions and the possibility of emergencies.
4. Ensure the competence of those working at height, including those planning and managing activities involving work at height.
5. Select and make use of appropriate work equipment.
6. Manage all risks associated with work at height including risks from working on or around fragile surfaces and from falling objects.
7. Inspection and maintenance of the work equipment to be used and inspection of the place where the work will be carried out (including access and egress routes).

### Closing Statement

Everyone employed by and working for Rowham Steel Products Ltd are responsible for helping to achieve the aims and standards within this Policy and together must ensure zero tolerance of any practice that could result in accidents and ill health. Please remember that we are not expected to put ourselves at risk and that the requirement to work safely is a condition of employment.

There is no reason for working in an unsafe manner and we must remember our moral obligation to our families and to each other