

Health & Safety Policy



(Based on HSE Guidance in INDG259)
POL H&S ISSUE 11 - May

2017

Axiom Group Limited

Axiom House
3 Ampt Hill Business Park
Station Road
Ampt Hill
MK45 2QW

Tel: 01525 844000

Fax: 01525 844045

Health and Safety Policy Amendments Register

ISSUE	DATE	SECTIONS AFFECTED	COMMENTS
D1	10/04/2009	Whole Document	New Policy - draft issue by JG - PHS
D2	16/04/2009	Whole Document	Response and Amendments by AM
D3	17/04/2009	Whole Document	Draft endorsed by AM for issue 1
D4	17/04/2009	Whole Document	MD's Review & Directors Signatures added
1	01/05/2009	Whole Document	Issue 1 signed by all Directors
2	21/05/2010	Whole Document	Annual Review
3	27/07/2010	Front Cover & Whole Document	New Front Cover and insertion of Quality Management reference
4	01/11/2011	Whole Document	Annual Review
5	11/05/2012	Organisation Chart, Asbestos & Training	New Health & Safety Advisor
6	01/05/2013	Minor Changes to Documents List &	Annual Review
7	21/05/2014	Minor Changes to Documents	Annual Review
8	13/02/2015	Minor Changes to Documents	Annual Review
9	29.04.2015	Changes to Legislation	Policy Update
10	27.04.2016	Minor Changes to Documents	Annual Review
11	23.05.2017	Minor Changes to Documents Bradley	Annual Review

Contents Page

Contents	Page
Record of Amendments	i
Contents Page	ii
Company Health and Safety Statement of Intent	
Section 1 AGL Statement of Intent	1
Mindmap for Compliance	2
Health and Safety Documentation	3
Records and Registers	4
Company Health and Safety Responsibilities	
Section 2 Organisation - Group Directors	5
Section 3 Company Organisation	6
Register of H&S Legislation	
Company Health and Safety Arrangements	
Section 4 Risk Assessment	7
Section 5 Consultation	8
Section 6 Plant and Equipment	9
Section 7 Hazardous Substances - COSHH	10
Section 8 Information, Instruction and Supervision	11
Section 9 Training	12
Section 10 Work Related Ill Health and Health Surveillance	13
Section 11 Welfare and First Aid	15
Section 12 Provision of Personal Protective Equipment (PPE)	16
Section 13 Accidents and Incidents	16
Section 14 Accident Reporting Procedures (RIDDOR)	16
Section 15 Monitoring	17
Section 16 Fire and Evacuation	18
Section 17 Slips, Trips and Falls	18
Section 18 New or Expectant Mothers	18
Section 19 The Disability Discrimination Act (DDA)	21
Section 20 Asbestos	22
Section 21 Work at Height	23
Section 22 Manual Handling	23
Section 23 Display Screen Equipment	23
Section 24 Noise	26
Section 25 Vibration	26
Section 26 Electricity	27
Section 27 Stress	28
Section 28 Workplace Transport	28
Section 29 Company Driving Policy	29
Section 30 Contractor's Duties under CDM	30
Section 31 Sub-Contractor's Appraisal System	31
Section 32 Employment of Non-English Speaking Personnel	32



SECTION 1 - AGL STATEMENT OF INTENT

Statement of intent

We recognise that we have a duty of care to all our employees, our sub-contractors, clients and to the many other people who are affected by the way we manage our work. We will therefore ensure that we comply with our legal obligations by managing health and safety appropriately. As part of this we will:

- Comply with the provisions of the Health and Safety at Work etc. Act 1974 and the Regulations that apply to our activities
- Provide sufficient resources for the proper implementation of this Policy.
- Employ the right people for the job, ensuring they are skilled and competent, and provide them with training as necessary
- Ensure that suitable and sufficient procedures are in place for all tasks that we undertake.
- Operate an 'open door' policy to allow all staff to challenge the management team on any health and safety matter

Our objective for this year is to update and improve the usability and accessibility of our health and safety management system

The Management and supervisory staff have responsibilities for the implementation of this policy and will monitor the company's operations to ensure it is given adequate and appropriate consideration in the planning and day-to-day supervision of all work.

This policy will be reviewed by the Director Responsible for Health and Safety in the event of any changes, to our working practices, and/or in legislation and/or every 12 months, whichever is the sooner.

Signed:

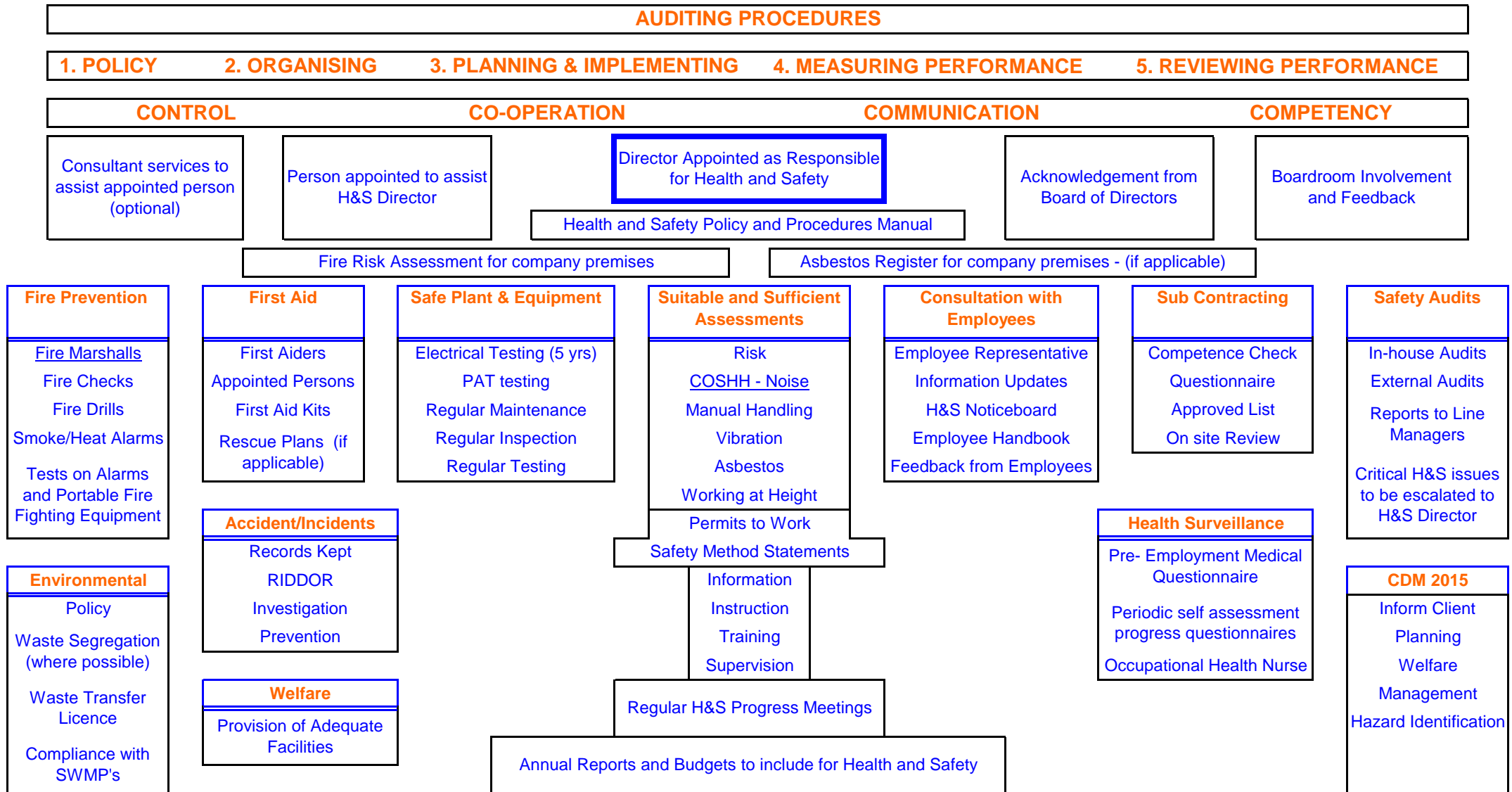
Position in Company: **Managing Director**

Date: 1st May 2017

Review Date: 30th April 2018

Axiom Group Health and Safety Action - Planning Chart

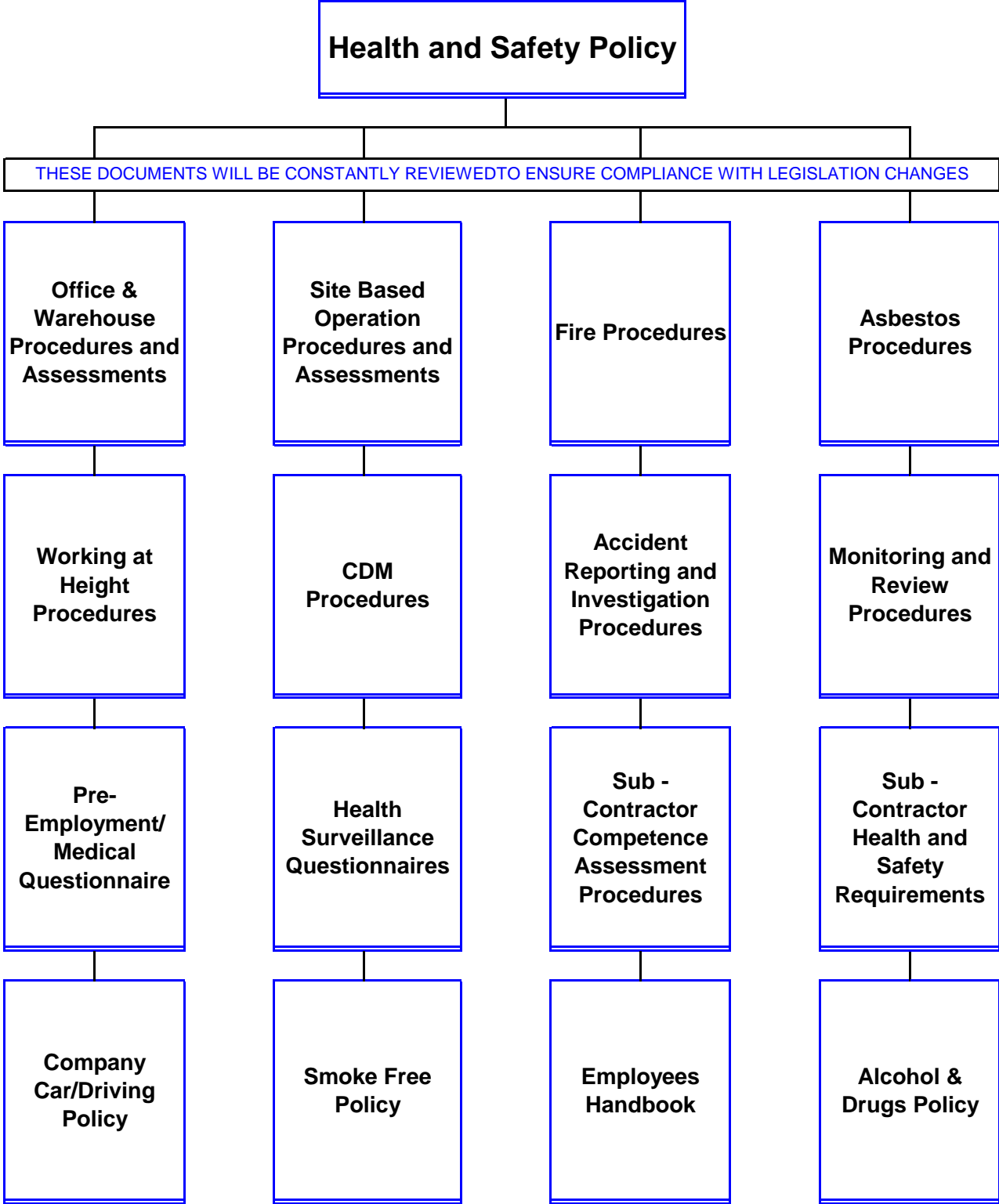
Mindmap for Successful Health and Safety Management based on HSG 65



Axiom Board of Directors consider that by giving suitable and sufficient consideration to the issues as identified within the mindmap above, the Axiom Group can demonstrate leadership in the successful management of health and safety within their business in accordance with current HSE and EA guidance.

Health and Safety Documentation and Information

Axiom Group will provide health and safety documentation to ensure a systematic approach to managing health and safety by way of the provision of a health and safety policy supported by the following procedures which will form the Procedures Manual when complete.



Health and Safety Records and Registers

To assist the Axiom Group in managing health and safety, the following records and registers will be kept at the Axiom Group Head Office.

THESE DOCUMENTS WILL BE CONSTANTLY REVIEWED TO ENSURE COMPLIANCE WITH LEGISLATION CHANGES

**Fire Log and
Fire Risk
Assessment**

**Asbestos
Statement**

**Record of
Accidents/
Incidents and
Enforcement
Action**

**Record of
Health
Surveillance -
Hand Arm
Vibration (HAV)
Register**

**Record of VDU-
DSE
Assessments**

**Training
Matrix/Log**

**Records of
Health and
Safety Meetings**

**Plant and
Equipment
Maintenance
Log**

**Ladder
Inspections**

**Record of
Vehicle
Inspections**

Section 2 - Organisation

Group Directors

Overall responsibility for health and safety in the Axiom Group rests with the Directors.
Each Director is responsible for:

- Ensuring the integration of good health and safety management
- Implementing the health and safety policy in the area of the Group's operations under their control.
- Monitoring the performance of the Group's health and safety management system.
- Using the information gained from the monitoring process to review, annually, the health and safety management system and acting swiftly to make any changes that are shown to be needed.
- Leading by example.

Group Health and Safety Director - Andrew Milliner

The Group Health and Safety Director is responsible for:

- Ensuring that the Group's health and safety management system is up to date and fit for purpose.
- Providing information on the Group's health and safety performance to the Board.

Divisional Contract Managers are responsible for:

- Ensuring that the Group's health and safety policy is fully implemented in their area of control, particularly with respect to site documentation and reporting procedures.
- Monitoring the health and safety performance achieved on site.
- Reporting on the health and safety performance of their sites to the Group Health and Safety Director.
- Leading by example.

Health and Safety Advisers - The Bradley Group Ltd.

The Group's Health and Safety Advisers will:

- Provide advice and guidance on the Group's legal compliance;
- Work with all Group staff to help ensure the smooth implementation of the Group's health and safety policy;
- Update the Group Health and Safety Director on any changes in legislation or good practice;
- Assist the Group Directors in reviewing the health and safety management system.

Employees are responsible for:

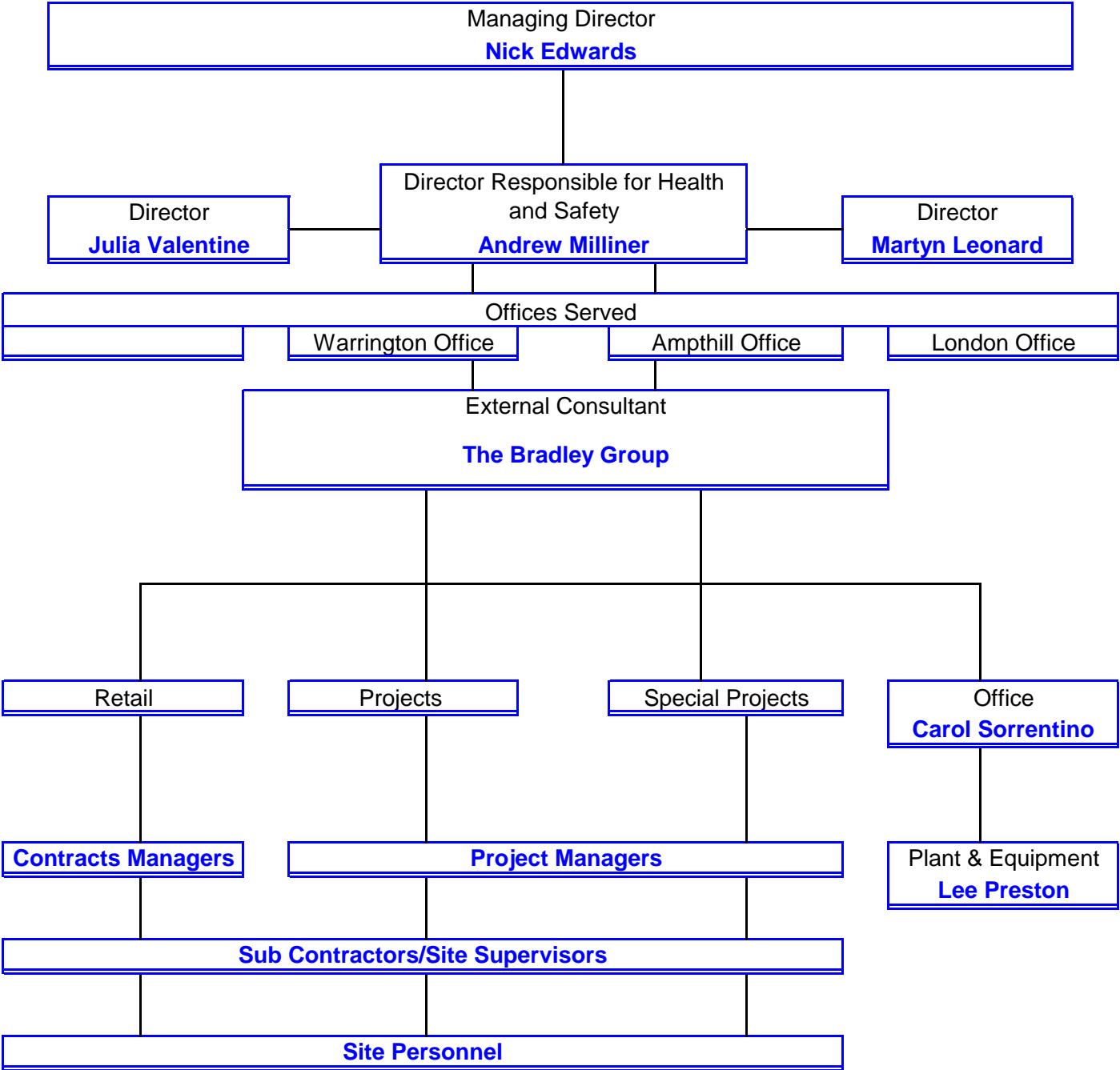
- Taking reasonable care of their own health and safety and that of others who might be affected by their work;
- Co-operating with Axiom Group in its efforts to comply with all its legal requirements;
- Reporting any shortcomings in the Group's health and safety management systems or any situations that are a threat to people's health and safety;
- Ensuring that they do not interfere with anything that is provided for their or others' health, safety or welfare.

Sub-contractors

Whilst we recognise that sub-contractors are not our employees, they do make a significant contribution to the overall standards of health and safety that the Axiom Group achieves.

We therefore require all sub-contractors to co-operate fully with us in the implementation of our health and safety management system on site.

Section 3 - Company Health and Safety Organisation Chart



Resources

Axiom Group Ltd will ensure sufficient time and financial provision is provided for managing the risks associated with its undertakings and implementing this Health and Safety Policy.

Register of H&S Legislation

ACTS

Equality Act 2010
Health & Safety at Work Act 1974
Health and Safety Offences Act 2008
Offices, Shops and Railway Premises Act 1963
The Regulatory Reform (Fire Safety) Order 2005

REGULATIONS

CHIP – Chemicals (Hazard Information and Packaging for Supply) Regulations 2009
Construction (Design and Management) Regulations 2015
Control of Asbestos Regulations 2012
Control of Noise at Work Regulations 2005
Control of Vibration at Work Regulations 2005
COSHH – Control of Substances Hazardous to Health Regulations 2002
Electricity at Work Regulations 1989
Health & Safety (Consultation with Employees) Regulations 1996
Health and Safety (Display Screen Equipment) Regulations 1992
Health and Safety (First Aid) Regulations 1981
Health & Safety (Training and Employment) Regulations 1990
Management of Health and Safety at Work Regulations 1999 (amended 2006)
Manual Handling Operations Regulations 1992
Personal Protective Equipment at Work Regulations 1992
Provision and Use of Work Equipment Regulations 1998
RIDDOR – Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
Work at Height Regulations 2005
Workplace (Health, Safety and Welfare) Regulations 1992

APPROVED CODES OF PRACTICE

Control of Asbestos at Work (L27)
Control of Substances Hazardous to Health (L5)
First Aid at Work (L74)
Management of Health and Safety at Work (L21)
Safe Use of Work Equipment (L22)
Workplace Health, Safety and Welfare (L24)

Section 4 - Company Health & Safety Arrangements

Section 4 - Health and Safety Risks Arising From Our Work Activities

The Management of Health and Safety at Work Regulations 1999 require employers and self employed persons to make suitable and sufficient assessment of the risks to workers and others who may be affected by their undertakings and to record the significant findings of that assessment. Other regulations e.g. Noise, Vibration, Manual Handling, COSHH, Asbestos, Lead, Work at Height etc, also contain requirements for risk assessment which are addressed specifically to the hazards and risks that are covered by those regulations.

Risk Assessments, and where applicable, Safety Method Statements, will be undertaken by:

Divisional Contracts Managers

The findings of the risk assessments will be reported to:

Andrew Milliner

Action required to remove/control risks will be approved by:

Andrew Milliner

- **Andrew Milliner** will ensure that Project/Contract Managers are empowered to take the required action to remove/control risks.
- **Divisional Contract Managers** will check that the implemented actions have removed/reduced the risks.
- Method Statements and Risk Assessments will be issued by the Project/Contract Managers to all site based staff before operations are commenced.
- Copies of various risk assessments are kept within Axiom Group Head Office.
- Assessments will be reviewed every twelve months, or when the work activity changes whichever is the soonest.

Axiom Group will undertake a specific risk assessment whenever young persons are expected to work on their behalf.

Company Health & Safety Arrangements - cont'd

Section 5 - Consultation With Employees

In order to meet the legal requirement of the Safety Representatives and Safety Committees Regulations 1977 and the Health and Safety (Consultation with Employees) Regulations Axiom Group will consult and communicate with employees on the following health and safety matters.

- **The content of this policy**
- **Any rules specific to a site or job**
- **Changes in legislation or working best practice**
- **The planning of Health and Safety training**
- **The introduction or alteration of new work equipment or technology**

Based on information that currently Axiom employees are not members of a recognised trade union and in accordance with information within the HSE guidance sheet INDG232 (rev 1), consultation will be given in regards to the Health and Safety (Consultation with Employees) Regulations

This communication, consultation and information in regards to Axiom's health and safety procedures, will take place directly with the employees via regular safety meetings, tool-box talks, e-mails and memo's posted on the staff notice board.

Employees representatives are:

Retail and Office Personnel Lee Musgrave/Carol Sorrentino	Projects and Special Projects Lance McGill/Felix Ike
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Consultation with employees is provided by:

Retail and Office Personnel	Projects and Special Projects
Andrew Milliner	

Company Health & Safety Arrangements - cont'd

Section 6 - Safe Plant and Equipment

Persons responsible for identifying the need for maintenance of plant/equipment will be:

Divisional Contract Managers

The person responsible for ensuring effective maintenance procedures are drawn up is:

Andrew Milliner

The person responsible for ensuring that all identified maintenance is implemented is:

Andrew Milliner

Any problems found with plant/equipment should be reported to:

Andrew Milliner

The person responsible for ensuring that new plant and equipment meets health and safety standards before it is purchased is:

Andrew Milliner

Company Health & Safety Arrangements - cont'd

Section 7 - Safe Handling of Hazardous Substances - COSHH

The person responsible for identifying all substances which need a COSHH assessment is:

Divisional Contract Managers

COSHH assessments will be completed by:

Divisional Contract Managers

The person responsible for ensuring that all actions identified in the assessments are completed is:

Divisional Contract Managers

The persons responsible for ensuring that all relevant employees are informed about the COSHH assessments are:

Project and Contract Managers

The person responsible of ensuring new substances can be used safely before they are purchased is:

Andrew Milliner

Assessments will be reviewed every twelve months, or when the work activity changes, whichever is the soonest.

Company Health & Safety Arrangements - cont'd

Section 8 - Information, Instruction and Supervision

The Health and Safety Law Poster is displayed at:

Axiom Group Head Office

Health and Safety Leaflets are available from:

Carol Sorrentino

Health and Safety Advice is available from:

Andrew Milliner - 07748 327 992

The Bradley Group - 01795 599 989 / 07540 725 858

HSE Helpline: 0845 345 0055

HSE Website - <http://www.hse.gov.uk/>

Supervision of young workers/trainees will be arranged/undertaken/monitored by:

Divisional Contract Managers

- **Andrew Milliner** is responsible for ensuring that all employees working at locations under the control of other employers, are given relevant health and safety information

Company Health & Safety Arrangements - cont'd

Section 9 - Competency for Tasks and Training

Induction training will be provided for all employees by:

Departmental Managers

Job specific training will be arranged by:

Departmental Managers

Specific jobs requiring special training will be arranged by:

Carol Sorrentino

Health and safety training is constantly under review for Directors, and all persons who hold a management or supervisory position and those working on sites. A training matrix has been drawn up and will be implemented within the 2016/2017 Axiom financial year.

The training matrix and records/certificates will be held at:

Axiom Group Head Office

Training will be identified, arranged and monitored by:

Andrew Milliner and The Bradley Group

Company Health & Safety Arrangements - cont'd

Section 10 - Work Related ill Health and Health Surveillance

Health surveillance is required for employees likely to be exposed to the following:

- Use of Substances Hazardous to Health
- Musculoskeletal Disorders
- Noise Induced Hearing Loss (NIHL)
- Hand Arm Vibration
- Vibration White Finger
- Asbestos Containing Materials
- Repetitive Strain Injuries (RSI's)
- Work with VDU's

Assessments will be undertaken in order to reduce the affects of the above issues and all employees will be expected to fully comply with the control measures required to reduce or eliminate the risks and will include some or all of the following:

- Use of alternative, safer substances, processes or equipment:
- Proper ergonomic posture during lifting procedures and at work stations:
- Good personal hygiene and use of barrier and moisturising creams:
- Selection and use of appropriate equipment to reduce affects of HAV and NIHL:
- Use and maintenance of Personal Protective Equipment (PPE):
- Access to Asbestos Information for client premises:
- Provision of free eye tests based on DSE assessments and health surveillance:

All employees undertaking works likely to expose them to any or all of the above issues will be requested to complete an initial employee medical questionnaire in order for Directors to determine if special arrangements are likely to be required to prevent or reduce exposure to persons carrying out such works.

All employees will be briefed on the control measures to take and personal protection measures/equipment will be made available for use on site.

Ongoing self assessment for employees will be implemented in the form of periodic and regular questionnaires being issued to all employees as listed as likely to be exposed to the above, with completed questionnaires to be held within personal files and treated as medical-in-confidence when complete. Refer to the Procedures Manual for a list of health questionnaires.

Employees will be encouraged to report, in confidence, any symptoms likely to give cause for immediate concern, and to make arrangements as soon as possible to see their GP or other appropriate source of medical attention.

Further advice on occupational health matters can be obtained from your nearest Employment Medical Advisory Service department (EMAS) details of which are on the Health and Safety Law Poster or available from:

www.hse.gov.uk/forms/health/emasoffices.htm

Workplace Health Connect is a service aimed at small and medium-sized businesses designed to help tackle and reduce the incidence of work related ill-health in England and Wales. They have a dedicated adviceline on 0845 609 6006 and a website at:

www.hse.gov.uk/workplacehealth/index.htm

Company Health & Safety Arrangements - cont'd

Section 10 - Work Related ill Health and Health Surveillance continued

Health surveillance will be arranged by:

Andrew Milliner

Health surveillance records will be deemed confidential and kept in:

Head Office - Staff Personal Files

Negotiations are currently in progress for appointment of providers of Occupational Health Services and details will be made available as soon as they become known.

For Occupational Health issues, which cannot be controlled via Axiom's in-house procedures, Axiom will call on the services of:

Bedford Occupational Health Services
South Wing,
Kempston Rd
Bedford
MK42 9DJ

Company Health & Safety Arrangements - cont'd

Section 11 - Welfare and First Aid Provision

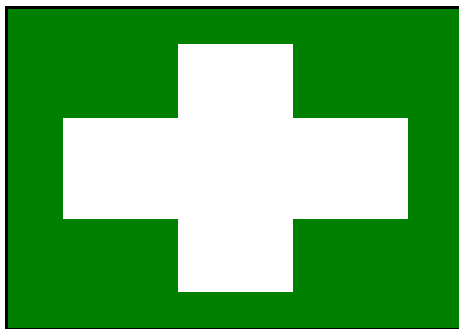
Staff Welfare

Generally arrangements are made, where possible, for our site staff to use Client and/or Principal Contractor welfare facilities at sites under their management. Where these facilities are not provided by the Client or Principal Contractor, the company will provide suitable welfare facilities. As a minimum the following requirements will be adhered to:

- Toilet/washing facilities accessible on site
- Eating/rest facilities accessible on site

Adequate canteen and toilet facilities are available at our head office for non site personnel and visitors.

First Aid



Head Office Appointed Persons are:

Carol Sorrentino and Martyn Leonard

The first aid kits for the office are kept at:

Ground floor kitchen area

Site Qualified First Aiders:

As appointed on each project with assistance from the client and Principal/Main Contractors

Site first aid kits are kept in:

Company Vehicles &/or Principal Contractors Site Cabin

The details of all first aid personnel is displayed on:

Office and Site Welfare Noticeboards

Regular checks on the first aid kits will be undertaken by:

Carol Sorrentino

Company Health & Safety Arrangements - cont'd

Section 12 - Personal Protective Equipment (PPE)

Appropriate personal protective equipment will be issued to employees as and when necessary for work activities.

Training will be provided for employees on the safe use, storage and maintenance of the relevant equipment before issue, and a written record detailing what PPE has been issued will be signed by the employees on receipt of the equipment and the hard copy kept on file.

Employees have a legal duty to wear PPE as specified in relevant site rules, risk assessments and method statements.

Any defects or malfunction of PPE must be reported to:

Andrew Milliner via Divisional Managers

Section 13 - Accidents/Incidents

Office - All injuries to employees resulting from an accident whilst at work, however minor, must be reported to the First Aider who will ensure that a record is made in the Accident Report Book. This also applies to injuries received by members of the public, staff and visitors who are injured within Axiom Group's premises.

Site Based Personnel - All injuries to employees resulting from an accident whilst at work, however minor, must be reported to the appointed First Aider for assessment and any further actions. Details must be entered in the accident report form (available from Axiom Head office) and sent to the Axiom Group Head office for possible escalation action. All accidents and cases of work related ill health will be recorded in the Axiom Head office Master Register which will be kept in a secure location in accordance with the Data Protection Act
The master accident book is kept at:

Andrew Milliner office - locked filing cabinet

All accidents will be investigated and recorded ensuring any remedial actions are taken to prevent the possibility of any re-occurrence.

Section 14 - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

Axiom Group Ltd will ensure they will comply with the above regulations which place a legal duty on employers to report work-related deaths, major injuries or over-seven-day injuries, work related diseases, and dangerous occurrences (near miss accidents).

The person responsible for reporting accidents, diseases and dangerous occurrences to the enforcing authority is:

Andrew Milliner

For more details of Accident recording and reporting refer to the Procedures Manual.

Company Health & Safety Arrangements - cont'd

Section 15 - Monitoring

To check our working conditions, and ensure our safe working practices are being followed, we will:

- Undertake Site Inspections, record the findings ensuring personnel are communicated with on the outcome and take remedial action when necessary to rectify any shortfalls.
- Gather data about injuries and cases of ill health (including monitoring of sickness absence records) and incidents with the potential to cause injury, ill health or loss.
- undertake systematic inspection of premises, plant and equipment to ensure the continued operation of workplace precautions and compliance with safe working procedures;
- undertake environmental monitoring and health surveillance that check the effectiveness of health control measures and detect the early signs of harm to health.

The person responsible for ensuring accidents and incidents are investigated is:

Andrew Milliner

The person responsible for investigating work-related causes of sickness absences is:

Andrew Milliner

The person responsible for acting on investigation findings to prevent a reoccurrence is:

Andrew Milliner

Company Health & Safety Arrangements - cont'd

Section 16 - Emergency Procedures - Fire and Evacuation

The Regulatory Reform (Fire Safety) Order 2005 (FSO) places duties on "responsible persons" to the extent that they have control over premises, to:

- assess the risks posed by fire to the health and safety of their employees and to anyone else who may be affected by their activities; and
- to eliminate those risks, so far as reasonably practicable, or to otherwise reduce those risks to a tolerable level.

Axiom Group Ltd recognises and acknowledges its responsibility to take general precautions to protect the safety, so far as reasonably practicable, of its employees and anyone else potentially affected by its undertaking, against fire and/or dangerous substances which could give rise to fire and the effects of fire.

The person responsible for ensuring a Fire Risk Assessment is undertaken is:

Andrew Milliner

Escape routes are checked daily by:

Carol Sorrentino and Martin Smith

Arrangements to ensure portable fire extinguishers are maintained and checked are made by:

Lee Preston

Alarms are tested monthly by:

Lee Preston

Emergency evacuation will be tested:

every 6 months

FIRE ACTION

IF YOU DISCOVER A FIRE

- 1) Sound the alarm (s) located at:

FIRE CALL POINTS NEAR EXIT DOORS

- 2) Call the Emergency Services - Dial

9 for outside line then 999 or use mobile

- 3) If trained in the safe operation of the correct fire fighting equipment and **ONLY** if safe to do so - try to extinguish the fire. If you consider your life to be at risk or your exit route is threatened - leave the building immediately.

- 4) Report to person in charge of Assembly Point

ON HEARING THE FIRE ALARM

- 5) Leave the building immediately by nearest Fire Exit

- 6) Close all doors behind you

- 7) Report to Person in charge of the Assembly Point at:

FURTHEST POINT OF FRONT CARPARK

IF YOU HAVE ANY DOUBTS AS TO YOUR SAFETY OR ABILITY TO EXTINGUISH THE FIRE LEAVE THE BUILDING IMMEDIATELY



- DO NOT TAKE ANY UNNECESSARY RISKS**
- DO NOT STOP TO PICK UP PERSONAL BELONGINGS**
- DO NOT RETURN TO THE BUILDING FOR ANY REASON UNTIL AUTHORISED TO DO SO**

AXIOM GROUP LTD - HEAD OFFICE

FIRE INFORMATION



FIRE MARSHALS - GROUND FLOOR

Martyn Leonard, Derek Underwood

Carol Sorrentino, Lee Preston

FIRE MARSHALS - FIRST FLOOR

Carly Fensome

Martin Smith

All staff must remain aware of the locations of fire exits and portable fire fighting equipment - **IF IN DOUBT - ASK ABOUT**

ASSEMBLY POINT LOCATION IS:



FURTHEST POINT IN FRONT CARPARK

Company Health & Safety Arrangements - cont'd

Section 17 - Slips, Trips and Falls

Axiom Group have to ensure their employees and anyone else who could be affected by their work (such as visitors, members of the public, etc.), are kept safe from harm and that their health is not affected. This means slip and trips risks must be controlled to ensure people do not slip, trip and fall.

The following procedure will be followed to ensure an effective management system is adhered to:

- Work will be planned with employees to identify potential problem areas and set goals for improvement.
- Employees will be trained to ensure they have the knowledge to identify and take action over potential risks.
- Employees will be organised to be responsible for specific areas, including cleaning and contract staff.
- Control measures will be put in place to ensure working practices and processes are being carried out properly and a record will be kept of all cleaning and maintenance work.
- The procedure will be monitored and reviewed. Employees will be involved in the process to discuss feedback with the possibility of revising control measures if necessary.

Section 18 - Risk Assessment for New or Expectant Mothers

Axiom Group will assess the risk to the health and safety of women who are pregnant, have recently given birth, or who are breastfeeding as soon as they have been made aware of such circumstances.

Axiom Group will ensure workers are not exposed to the risks identified by the risk assessment, which could present a danger to them or their babies' health, safety or welfare.

Currently, there is no requirement for such assessment within the Axiom Group.

Section 19 - The Disability Discrimination Act (DDA)

The Disability Discrimination Act defines disability as " a physical or mental impairment which has a substantial and long-term adverse effect on the ability to carry out normal day-to-day activities".

Axiom Group Ltd recognises and intends to meet its statutory obligations under the legislation by not discriminating against an employee with a disability, making reasonable adjustments to seek to overcome any practical difficulties that may prevent an applicant with a disability from taking up employment and further, to promote disability equality.

Axiom Group Ltd will provide such resources as may be necessary to support the employment of people with disabilities, and undertakes to identify resources wherever possible.

Company Health & Safety Arrangements - cont'd

Section 20 - Asbestos

Even though asbestos containing materials have been banned in this country, it is estimated that there are still hundreds and thousands of tonnes still present in all types of buildings.

It is unlikely to be present in newly constructed buildings, however caution and vigilance must always be a high priority prior to the start of any works on site.

Company Premises

In accordance with the Control of Asbestos Regulations 2012, Axiom Group will undertake an asbestos survey of their head office premises and hold a register to record the presence or suspected presence of any Asbestos Containing Materials (ACM's). The register will be held and maintained by the Company Secretary and will be made available to any person requiring to know the whereabouts of such materials.

Other Premises Information

Under the Control of Asbestos Regulations, all property owners/controllers of non domestic premises must ensure that a register is available of whether asbestos containing materials are present or not. Axiom Group, where possible, and where known, will inform its employees, and those working on their behalf, of information on the presence of asbestos containing materials, known to be in buildings or on site where work is likely to be undertaken. This information will be requested prior to the start of works from either the Client, CDM Principle Designer or Principal Contractor.

Axiom Group employees and contract personnel **MUST** always ask whether an asbestos register exists, especially on buildings built before 1999 and whether works they are due to undertake are likely to be affected by asbestos containing materials.

All materials identified or suspected of containing asbestos products **MUST** be treated as if asbestos is present until further investigation can confirm otherwise. If there is **ANY DOUBT**, works **MUST NOT** start unless and until further investigations have taken place to ensure that is safe to do so.

A programme of Asbestos awareness training is currently being undertaken by Axiom Group Site personnel and will continue until all site managers, supervisors and operatives have the required competency in order to carry out their works in a safe manner.

Further information will be included in the Axiom Group Procedures Manual when complete, until then should clarification be required, please contact Andrew Milliner.

Company Health & Safety Arrangements - cont'd

Section 21 - Work at Height

Axiom Group Ltd recognise that the Work at Height Regulations apply to all work activities where employees may require to access and/or work in places at height. It is understood that Work at Height is deemed to be a place 'at height' if a person could be injured falling from it, even if it is below ground level.

The Axiom Group also recognise that much of their normal work activities do not require to access or work at height outside of the company warehouse or office areas.

Onsite working procedures which may require works at height are likely to be at the edges of mezzanine floors/stairs or similar where finishes are required prior to the installation of permanent handrails or partition walls. Under arrangements made with Axiom's current clients and Principal/Main Contractors provision will be made for appropriate working platforms to be provided for Axiom's use.

Prior to the start of any work at height in these circumstances, the working environment must be assessed for any risk of falls and if there are any concerns the Axiom Group management must be informed. Under no circumstances should any guards, rails, toeboards or coverings, put in place to protect from falls, be removed by Axiom personnel or sub contractors. All such requests to remove such must be directed to the Client/Principal or Main contractor.

Where work at height is required within Axiom's warehouse and office areas, Axiom Group Ltd will comply with The Work at Height Regulations 2005 and a specific assessment will be undertaken.

Axiom Group Ltd will follow the hierarchy for managing and selecting equipment for work at height and will:

- avoid work at height where they can
- use work equipment or other measures to prevent falls where they cannot avoid working at height
- where they cannot eliminate the risk of a fall, use work equipment or other measures to minimise the distance and consequences of a fall should one occur

Axiom Group Ltd will ensure:

- all work at height is properly planned and organised
- all work at height takes account of weather conditions that could endanger health and safety, where applicable
- those involved in work at height are trained and competent
- the place where work at height is done is safe
- equipment for work at height is appropriately inspected
- the risks from fragile surfaces are properly controlled where applicable
- the risks from falling objects are properly controlled

Work at Height Risk Assessment

All work at height will be subject to a specific risk assessment which will take into account the hierarchy of controls and the suitability of access equipment.

Company Health & Safety Arrangements - cont'd

Section 22 - Manual Handling

The Manual Handling Operations Regulations 1992, as amended in 2002. apply to a wide range of manual handling activities, including lifting, lowering, pushing, pulling or carrying.

Axiom Group will:

- consider the risks from manual handling to the health and safety of their employees;
- avoid the need for hazardous manual handling, so far as is reasonably practicable;
- assess the risk of injury from any hazardous manual handling that can't be avoided, and
- reduce the risk of injury from hazardous manual handling, so far as is reasonably practicable.

Axiom Group will provide training for employees who undertake manual handling as part of their work activities, and will include:

- manual handling risk factors and how injuries occur
- how to carry out safe manual handling including good handling technique
- appropriate systems of work for the individuals tasks and environment use of mechanical aids
- practical work to allow the trainer to identify and put right anything the trainee is not doing safely

Axiom Group Ltd will consult and involve their workforce and are aware that employees, due to their knowledge and experience of their working environment and activities, are likely to be best placed to offer practical solutions to health and safety issues which may affect them.

All employees will be encouraged to bring such information to the attention of the person Responsible for Health and Safety within the Axiom Group.

Company Health & Safety Arrangements - cont'd

Section 23 - Display Screen Equipment

It is the Axiom Group Ltd's policy to comply with the law as set out in the Health and Safety (Display Screen Equipment) Regulations.

Axiom Group Ltd will conduct health and safety assessments of all workstations within the workplace provided for the purpose of employees using VDU screens as part of their usual work and will ensure that all workstations meet the requirements set out in the Schedule to the Regulations.

- The risks to users of VDU screens will be reduced to the lowest extent reasonably practicable.
- VDU screen users will be allowed periodic breaks in their work.
- Footrests will be provided when necessary where individual workers are unable to rest their feet flat on the floor. Footrests should not be used when they are not necessary as this can result in bad posture.
- Software provided by the Company will be easy to use and, where appropriate, adaptable to the level of knowledge or experience of the operator or user; no quantitative or qualitative checking facility may be used without the knowledge of the operator or user.
- Eyesight tests will be provided for VDU screen users on request.
- Where necessary VDU screen users will be provided with the basic necessary corrective equipment.

All VDU screen users will be given appropriate and adequate training on the health and safety aspects of this type of work and will be given further training and information whenever the organisation of the workstation is substantially modified.

Further information will be included in the Axiom Group Procedures Manual when complete, until then should clarification be required, please contact Andrew Milliner.

Company Health & Safety Arrangements - cont'd

Section 24 - Noise

The aim of the Control of Noise at Work Regulations 2005 (the Noise Regulations) is to ensure that workers' hearing is protected from excessive noise at their place of work, which could cause them to lose their hearing and/or to suffer from tinnitus (permanent ringing in the ears).

The level at which employers must provide hearing protection and hearing protection zones is 85 decibels 137(daily or weekly average exposure) and the level at which employers must assess the risk to workers' health and provide them with information and training is now 80 decibels. (peak sound pressure is 135 decibels.) There is also an exposure limit value of 87 decibels, (peak sound pressure of 140 decibels) taking account of any reduction in exposure provided by hearing protection, above which workers must not be exposed. Axiom Group Ltd will assess and identify measures to eliminate or reduce risks from exposure to noise so that they can protect the hearing of their employees.

Where the risks are low, the actions to take may be simple and inexpensive, but where the risks are high, they will be managed using a prioritised noise-control action plan.

Axiom Group will, where required, ensure that:

- hearing protection is provided and used;
- any other controls are properly used; and
- provide information, training and health surveillance.

Section 25 - Vibration

Hand-arm vibration is vibration transmitted from work processes into workers hands and arms. It can be caused by operating hand-held power tools such as breakers, and hand guided equipment, such as powered floor grinders etc.

Regular and frequent exposure to hand-arm vibration can lead to permanent health effects.

This is most likely when contact with a vibrating tool or work process is a regular part of a persons job.

Occasional exposure is unlikely to cause ill health. Hand-arm vibration can cause a range of conditions collectively known as hand-arm vibration syndrome (HAVs), as well as specific diseases such as carpal tunnel syndrome.

Axiom Group Ltd recognise that they have a general duty to protect the health of employees and have a specific duty under the Control of Vibration at Work Regulations to protect employees from harm caused by vibration. Axiom will protect their employees and ensure a practical approach to providing this protection. We have developed our controls in accordance with the guidance provided by the Health and Safety Executive.

Refer to Vibration Control procedures in the Axiom Procedures Manual for further details.

Company Health & Safety Arrangements - cont'd

Section 26 - Electricity

The Electricity at Work Regulations requires certain precautions to be taken against the risk of death or personal injury from electricity in any work activity. The regulations also places duties on employees, and self employed persons to comply with the requirements as are within their control. Employees have an additional duty to cooperate with their employers. The Company will fully comply with these requirements.

The installation, operation, maintenance and testing of electrical systems and equipment will be carried out only by persons who are competent for the particular class of work. Employees will be trained and instructed to ensure that they understand the safety procedures which are relevant to their work and will work in accordance with the Company safety rules and this Policy.

Portable Electrical Equipment

- An electric appliance may be classed as "portable" if connected to the mains by way of a flexible lead and plug.
- Lee Preston is responsible for ensuring that a regular formal inspection and test is arranged for such equipment and records kept within the warehouse files.
- Portable electrical equipment will be subject to a visual inspection prior to use. If any defects are reported or damage detected, the equipment must be taken out of use, and either, sent for repair or disposed of ensuring compliance with The Waste Electrical and Electronic Equipment Regulations 2006.
- Pre use daily checks will be undertaken on all plant and equipment, either hired in or owned by the Axiom Group.

Company Health & Safety Arrangements - cont'd

Section 27 - Stress

Axiom Group Ltd recognises that it has a duty to ensure employees are not made ill by their work. The company understands that work related stress can be a cause of ill health and will take all reasonable practicable measures to ensure none of its employees suffer from work related stress.

Employees will work best when they are working at a level for which their talents and training equips them. Should this not be the case, or should the employee be suffering from stress, whether work or private life induced, the employee will be encouraged to discuss the issue in confidence with their Line Manager so that they can support the employee and provide such assistance as both parties think would be beneficial.

Section 28 - Workplace Transport

Workplace transport means any vehicle that is used in a work setting, such as forklift truck, cars and vans.

Axiom Group Ltd will ensure the following:

- Drivers are competent to carry out their work activities safely.
- Vehicles will be safe and suitable for their use. They will be maintained and will be replaced when necessary.
- Routes/roadways will be properly maintained.
- Drivers will be monitored. Drivers work schedules will be assessed on a regular basis to ensure they can complete their work duties in a reasonable amount of time.
- Risk assessments will be completed for loading and unloading of vehicles.
- Drivers are aware of the contents of The Highway Code.

Company Health & Safety Arrangements - cont'd

Section 29 - Company Driving Policy

The company will manage the risk to driver's health and safety by ensuring that a risk assessment is completed for all employees who have to drive to carry out their work.

The company will ensure that:

Drivers are:

- competent and capable of doing their work in a way that is safe for them and others;
- properly trained;
- sufficiently fit and healthy to drive safely and not put themselves and others at risk;
- provided with information that will help them reduce risk (e.g. recommended tyre pressures);
- provided with appropriate advice on driving posture.

Vehicles are:

- fit for the purpose for which they are used;
- maintained in a safe and fit condition.

Journey planning:

- takes account of appropriate routes;
- incorporates realistic work schedules;
- does not put drivers at risk from fatigue;
- takes sufficient account of adverse weather conditions.
- takes sufficient account of passive driving procedures;
- takes sufficient account of the company's carbon footprint liability and environmental issues in accordance with company policy.

Further information will be included in the Axiom Group Procedures Manual when complete, until then should clarification be required, please contact Andrew Milliner.

Company Health & Safety Arrangements - cont'd

Section 30 - Contractors Duties under the CDM 2007 Regulations

In line with the duties imposed under the CDM Regulations 2015, Axiom Group are aware that they have certain responsibilities to co-operate, communicate and co-ordinate their operations together with the duties and responsibilities of Principal Contractors. This co-operation includes the provision of information on hazards and risks likely to affect persons undertaking their works and persons who may be in the vicinity whilst this work is being undertaken.

Axiom Group work activities which are affected by the implementation of the CDM Regulations, will undertake their works in a safe manner and will:

- Satisfy themselves that any contractors or designers they engage are competent and adequately resourced. This will be achieved by use of a health and safety questionnaire requesting information of experience, competency and training etc.
- Co-operate with the principal contractor.
- Provide information to the principal contractor about risks to others created by their work in the form of risk assessments (required by the Management of Health and Safety at Work Regulations 1999 and Control of Substances Hazardous to Health Regulations 1999 (as amended to 2002), (COSHH), safety method statements or any other means requested by the Principal Contractor or Client's CDM Principle Designer.
- Comply with any reasonable directions from the principal contractor; and with any relevant rules in the Construction Phase Health and Safety Plan.
- Tell the principal contractor about accidents and dangerous occurrences and comply with the requirements of the RIDDOR regulations.
- Provide appropriate information for the Health and Safety File.
- Provide adequate, and appropriate, information and training to their employees, or those working on behalf of Axiom Group, so that competence can be demonstrated.
- Not allow their employees to start work on construction sites until they have been provided with basic information. This information will include, where appropriate the names of the CDM Principle Designer and Principal Contractor and will also include any information gained from the relevant parts of the Health and Safety Plan.
- Will promptly provide the Principal Contractor with any information which might affect the health and safety of workers or members of the public. This includes anything which might justify a review or update of the health and safety plan.

Company Health & Safety Arrangements - cont'd

Contractors Duties - cont'd

- Monitor the health and safety of their employees, at regular intervals, to ensure they are following the requirements of the relevant risk assessments and sections of the health and safety plan, by initiating site safety audits by in-house Contract Managers and by Axiom Group's Health and Safety Advisor, as instructed by the Directors.
- Take remedial actions where it is found that employees or those working on behalf of Axiom Group, and/or their sub contractors are not following a safe system of work on construction sites.
- Will notify the HSE where appropriate when working for a domestic client.

Section 31 - Sub-Contractors Appraisal System

The Directors of Axiom Group Ltd are aware that by the nature of its business, works on sites can sometimes be undertaken on Axiom Group's behalf by small companies or individuals where Axiom Group's clients require the work to be done.

In order for Axiom Group to satisfy compliance with statutory legislation, Axiom Group will appraise the health and safety performance of contractors likely to work on their behalf. This will be in the form of a health and safety competence questionnaire issued to all contractors currently undertaking works on its behalf and to all future prospective contractors or individuals likely to carry out these works.

On receipt of an appropriately completed questionnaire and supporting documentation, Axiom Group will place each successful sub-contractor on their Approved Sub-Contractor's List.

Every reasonable assistance will be offered to Sub-contractors in order to allow them to comply with their duties and responsibilities under current health and safety legislation.

All successful contractors will be sent a request to sign up to Axiom Group's Contractor's Health and Safety Requirements" prior to the start of any works on Axiom's sites.

Further information will be included in the Axiom Group Procedures Manual when complete, until then should clarification be required, please contact Andrew Milliner.

Company Health & Safety Arrangements - cont'd

Section 32 - Employment of Non-English Speaking Personnel

Axiom Group Ltd are aware of their duties in regard to the use of non-English speaking personnel, or personnel who may have difficulties in understanding English, and who may be required to work directly for Axiom Group as an employee or as a sub-contractor on their sites.

Where Axiom Group Ltd employ non-English speaking personnel directly they will provide their employees with understandable and relevant information on risks to their health and safety and on precautions to take to avoid those risks.

Information will be provided that takes into account any language difficulties or disabilities. Such information will be provided in whatever form is most suitable in the circumstances, as long as it can be understood by everyone.

Axiom Group will also make special, confidential arrangements for employees or workers with little, or no understanding of written English or with learning difficulties in general.

An assessment will be made and practical solutions will be put in place based on the result of individual assessments

Employees

- providing specialist training with the provision of an interpreter in health and safety matters.
- provide relevant information about the risks to which they may be exposed and the precautions they will need to take to avoid those risks;
- provision of local authority college details on English language courses.
- provision of written and verbal health and safety instructions in the employees own language.
- allowing extra safety induction time, if necessary for the employee to fully understand the instructions.
- give practical demonstrations of safety instructions as many times as is necessary in order to confirm understanding.
- provide relevant information about the risks to which they may be exposed and the precautions they will need to take to avoid those risks;
- provide relevant health and safety information in regards to the specific hazards on site as the works progress in the form of verbal and written memo's placed on the site noticeboard.
- provide a point of contact within the company so the employee can raise concerns about their health, safety, welfare and emergency arrangements or procedures.

Sub-contract Personnel

- requesting the provision of an interpreter (or same language speaker) from the Contract company to accompany non-English speaking contract personnel whilst on site.
- ensuring a suitable and sufficient risk assessment has been provided by the Contract company in regards to the risks to which they may be exposed and the precautions they will need to take to avoid those risks;
- ensure an appropriate level of supervision is provided by the Contract company and that the operative is able to communicate with their supervisors and their peers in regards to emergency procedures. The level of supervision will depend on the level of risk and on the level of understanding portrayed by the non-English speaking operative.
- Provision of written and verbal health and safety instructions i.e. safety induction sheet etc, where reasonably practicable, in the contractor's own language.
- provide relevant health and safety information in regards to the specific hazards on site as the works progress in the form of verbal and written memo's placed on the site noticeboard.
- Allowing extra safety induction time, if necessary for the operative to fully understand the instructions.

Company Health & Safety Arrangements - cont'd

Information Available to Non-English Speaking Personnel

Available Training

Government assistance is available for those wishing to progress in understanding the English language and other work skills by contacting free call Train to Gain on 0800 015 55 45 or visit the website at the following link <http://www.traintogain.gov.uk/>

Health and Safety Contact Details

An interpretation service specifically for health and safety issues is available from the Health and Safety Executive (HSE) on their public enquiry service "Infoline" on 0845 345 0055

- Tell the operator which language you wish to speak
- The operator will then arrange for an interpreter to be connected into the telephone line within a minute or so
- You will then be able to continue your enquiry in your own language.

Medical Assistance Details

The National Health Service NHS Direct 0845 4647 also has an interpretation service and gives valuable information in regards to the scope of services available.

Relevant information is also included in our site specific documentation which is also available in some foreign languages.

In the event that the details, currently written in English, within Axiom Group Ltd's health and safety policy and all relevant procedures are not fully understood by any future non-English speaking employees, then translated script will be made available in whichever language is necessary or appropriate.