

UPA Ltd

Health, Safety and Environment Policy



UNITED POWERED ACCESS LTD

HEALTH, SAFETY & ENVIRONMENT POLICY

REVIEWED 29/09/2025 - NO CHANGES REQ/UPDATED ONOGRAPHY.

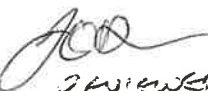
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 JO'BRIEN (GENERAL MANAGER)

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 JO'BRIEN (GM).

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Section 1(a)

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Section 2(b)

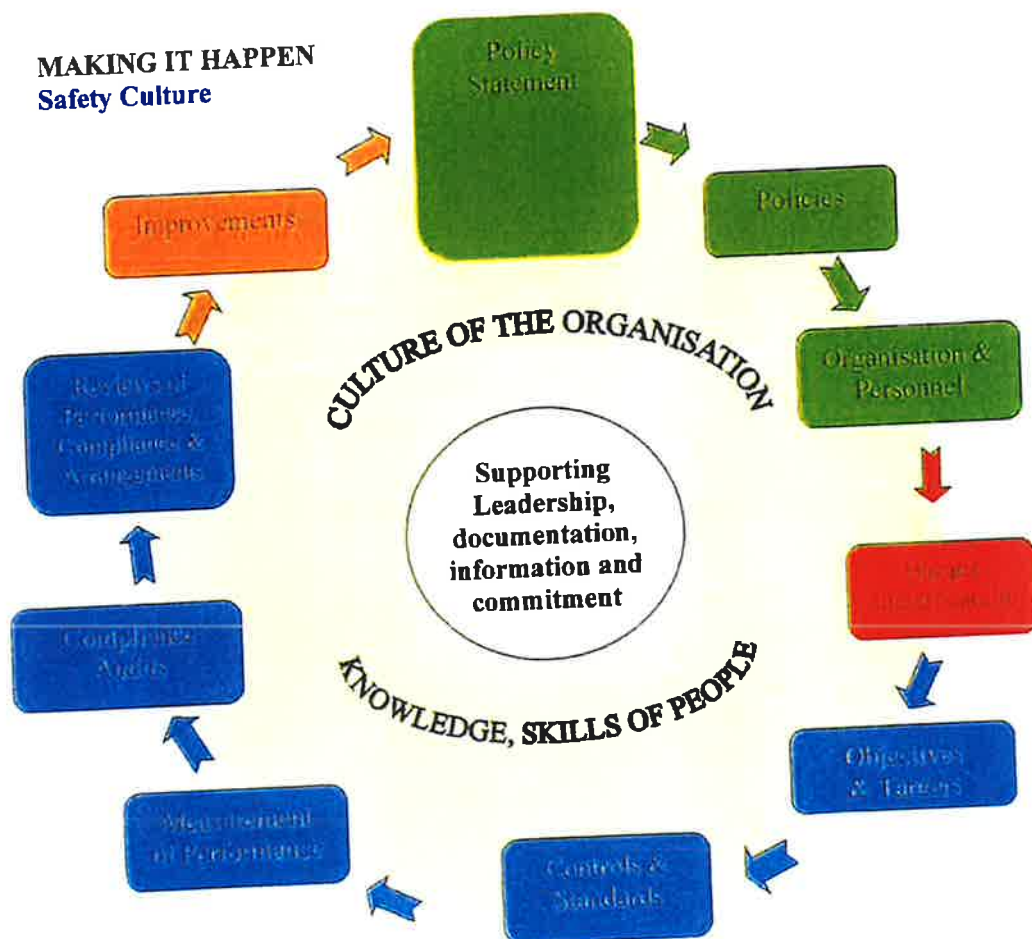
Management System

This section describes the Management System applied by UPA Ltd, to ensure that it meets or exceeds applicable legislation and employee's expectations. It relates to Occupational Health & Safety practices used to ensure that the Management System is effective.

UPA Ltd recognises that Occupational Health & Safety is an integral part of the way we conduct our business.

The requirements laid down within this section represent a minimum standard and should be exceeded where practicable through the principles adopted in the Management model shown below.

MAKING IT HAPPEN Safety Culture





The Management of the system is the responsibility of the Directors and the method in which we control all our requirements appertaining to Occupational Health & Safety issues by assessing the risk to improve performance through continual improvement. The development and implementation of this Occupational Health and Safety Policy is built on OHSAS 18001, current legislation and codes of practice.

The Company believes that the Management of this policy requires a systematic approach based on proven principles, agreed by Directors and the procedures arising from these key points. The existing arrangements for managing Occupational Health and Safety requirements are subject to ongoing review, to ensure system adequacy and to measure progress, against set objectives and targets.

The culture is built on competencies and attitudes coupled with the value it places on its customers and employees.

To achieve this we will focus on the following aspects of performance:

- Bring a greater focus and awareness to our Occupational Health & Safety responsibilities
- Influence the attitudes and behavior of our employees with respect to Occupational Health and Safety by highlighting the effect each employee's actions can have on them

Approvals

The policy and subsequent Management System will be approved and authorised by the Directors.

Issue

All manuals and change notifications will be issued via the computer software system. All employees will have access to the relevant sections that relate to their responsibilities and authority. All hard copies issued are uncontrolled documents for information purpose only.

Receipt

On notification of new / or changes to documentation, all the pertinent document users will acknowledge receipt of notification of new issues via the computer software system

Review

The policy and subsequent Management System will be reviewed regularly and any changes reported to all employees.

Revision

Requests regarding amendments to this policy shall be submitted to the Directors, who will review the proposed changes regarding effects on any other procedure. All individuals affected by the request will be notified. On acceptance or rejection of the change all the relevant people will be notified via the computer software system. If the request is accepted the relevant procedure / form issue will be changed incrementally.



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Document Control

Individuals responsible for the control of documents referenced within each procedure will be updated as per "Revision". It is the responsibility of each individual to assess the need for the "control" of each document with respect to the effectiveness and efficiency of their process and the organisation as a whole.

The retention period for documents will be stated within each relevant procedure.

Policy

The Management of UPA Ltd are responsible for and committed to all aspects of the Health and Safety Management System, which has been documented within the policy, and presented to all employees. Information is also prominently displayed throughout the workplace, available to interested parties upon request and reviewed periodically to ensure they remain relevant and appropriate to the business.

Occupational Health and Safety Policy Statement

UPA Ltd Occupational Health and Safety Policy Statement is an acknowledgement of our ethical obligations to ensure, so far as is reasonably practicable, the provision of safe, healthy and environmentally secure working conditions for all employees and extends to others who may be affected by our work activities.

We are committed to the following:

- Providing safe places of work for staff, visitors and contractors.
- Providing safe systems of work.
- Securing our premises and company assets.
- Providing information, instruction, training and supervision of staff, and other features, which combine to form a safe, secure and healthy working environment.
- To take a proactive approach regarding occupational health and safety legislation that affects our business.
- To encourage suppliers and contractors to adopt the same occupational health and safety principles as UPA Ltd.
- To apply the principles contained in the policy when planning future changes and investments.



Objectives, Targets and Planning

The Occupational Health and Safety objectives and targets shall be prepared to allocate responsibility (at each relevant level) for the delivery of strategic objectives, targets and the timetable for their achievement by defining the key performance indicators by which UPA Ltd can be measured. These may be measured in terms of financial performance, non-conformance records, legal or other requirements and results from Management review processes.

The Occupational Health and Safety Management programme operating within UPA Ltd has been put in place to achieve continual sustainable improvement and to ensure that the agreed objectives are communicated to relevant personnel and that progress against objective targets is monitored, reviewed, recorded and updated accordingly.

Hazard Identification, Risk Assessment and Risk Control

The Management of UPA believes that the early design stage presents the best and most effective opportunity to specify the need to eliminate hazards. The identification of potential hazards and any resulting design change to eliminate the problem is far more cost effective at this stage. The formal hazard management process, which applies within UPA Ltd, is a proactive rather than a reactive procedure and has been divided into five basic steps:

- Inherent measures
- Hazard identification
- Risk analysis (frequency or consequence)
- Risk assessment (against set performance criteria)
- Risk reduction (through control and mitigation measures)

Risk assessments include routine and non-routine activities and may also be termed as job safety analysis or process hazard analysis.

UPA Ltd has established procedures to identify and maintain the safety aspects of its activities, products and processes, over which it has control or influence. These aspects will be taken into account when considering and reviewing the organisation and departmental objectives.

Legal and Other Requirements

UPA Ltd has established and maintains an index of regulatory Legislation, which is known to relate to the Occupational Health and Safety aspects of its activities, processes and services. These requirements are communicated to employees where appropriate. It is the responsibility of the Director to deploy these requirements to the relative personnel within their area.



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Management is responsible for and committed to all aspects of the Occupational Health and Safety Management System, however, the Directors shall verify that legal requirements are reviewed for compliance at regular intervals. Activities used to address these requirements include: system and work place audits, procedure monitoring, document review and analysis of accidents, incidents or associated occurrences.

Resource Management

The ultimate responsibility for the Occupational Health and Safety Management system and the allocation of sufficient resources within UPA Ltd rests with the Directors. This responsibility is cascaded through UPA Ltd and into projects through the Management structure. The provision of Occupational Health and Safety advice, information, guidance and support, is the responsibility of the Directors.

Competence, Awareness and Training

UPA Ltd shall identify all functions that require skills, which require the ability to perform specific operations, control of contractors, temporary workers or visitors and to identify Occupational Health and Safety hazards / risks applicable to specific areas, activities and tasks. This will enable them to understand the importance of legislation to which they have to work to and the job they have to perform.

It is the responsibility of the Directors to co-ordinate the training requirements identified for the employees within the Company. Training records of employees shall be maintained by the Directors. UPA Ltd will assess individual competency, training and personal needs for the development of all employees. Personal competence may be demonstrated by:

- Training carried out in house or externally
- Education qualification
- Experience and/or testing qualifications
- Certification of specific skills

It is the Director's responsibility to ensure that all employees are aware of their individual responsibilities to ensure that the product or service they supply is effective and therefore helps achieve the objectives of the organization.

Work Environment

The interaction between work areas, employees, contractors, facilities and equipment are identified as key elements for the Management of Occupational Health and Safety, based on legislative requirements and experience. Audits and inspections provide the reporting procedures, control and continual improvement necessary to ensure that UPA Ltd complies with legislation, strategic objectives and policies. UPA Ltd will maintain a working environment that will encourage and facilitate safety requirements as well as meeting and where practicable exceed current standards and legislation.



Consultation and Communication

UPA Ltd recognises that the successful implementation of the Occupational Health and Safety Policy and working arrangements within the Management System can be more effectively achieved through a positive Occupational Health and Safety culture. The workforce will be informed of the appointed personnel and employee representatives involved in the development and review of policies and procedures to help reduce risks. Employees are encouraged to be involved in the development and maintenance of the Occupational Health and Safety Management System. This involvement is maintained by Management commitment, communication and conjoined by co-operation of the employees. UPA Ltd has developed arrangements in the form of meetings and notice boards.

Emergency Preparedness and Response

UPA Ltd have developed and implemented specific procedures. The emergency evacuation plan details the arrangements for identification of potential accidents and emergencies and the methods for responding to incidents that may affect our business.

Emergency equipment, which are provided, clearly identified and tested at specified intervals (records of which shall be maintained).

Emergency practice drills are carried out at pre-determined intervals and a review is carried out to analyse the potential discrepancies within the systems after exercises to implement improvements identified.

Measurement, Analysis and Improvement

UPA Ltd monitors its Occupational Health and Safety performance by measuring operating performance and parameters, which will determine successful implementation of the policy.

These parameters fall into two categories:

- Proactive – measuring compliance with performance standards and policies
- Reactive – measures actual accidents, incidents and dangerous occurrences

These established and agreed indicators shall be reported on a monthly basis as part of continual improvement culture. Records shall be maintained to meet UPA Ltd, policies and legislative requirements, for the period defined within the applicable procedures.

All inspection, measurement and test equipment that could affect the performance of our processes, working environment, health and safety of our employees will be selected and calibrated to the relevant standard required, and at a frequency as specified or determined by the person responsible for the equipment.



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UPA Ltd will monitor and measure processes that they deem to be necessary to demonstrate and ensure a suitable working environment, the health & safety of our employees and conformity of the Management System.

UPA Ltd will continually assess the suitability of processes and the Management System using applicable methods with the aim of continual improvement.

Accidents, Incidents, Non-Conformance and Corrective / Preventative Action

Any function or activities that deviate from Occupational Health and Safety requirements shall be identified and investigated to determine the root cause of the deficiencies and remedial action implemented to stop any re-occurrence. The relevant employee and / or contractor shall be informed in writing of all such occurrences. A corrective action plan will be agreed, documented and implemented to an agreed timescale.

a) Accidents and Incidents

The occurrence of all accidents and incidents (including property damage) shall be recorded on the Company accident / incident forms, with investigation, classification and follow-up being completed by designated personnel. The scale of investigation is dependent on nature / severity of the occurrence, however, the procedures in place to control these activities shall apply to everyone

b) Non-Conformance

All causes of Occupational Health and Safety non-conformance shall be classified and analysed at a specified meeting.

c) Corrective / Preventative Action

Procedures for corrective and preventative action are established to ensure that Occupational Health and Safety non-conformance are recorded, investigated, controlled and action implemented to prevent re-occurrence of the accident, incident, risk and / or hazard encountered.



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Records and Records Management

Occupational Health and Safety records (hard copy and / or electronic media) shall be maintained to demonstrate the effectiveness of the Management System.

Instruction regarding the control records i.e. responsibility for retention, retention periods, disposal etc., is documented and essential records shall not be disposed of without permission from the Directors. Where specified by the regulatory body, relevant Occupational Health and Safety records shall be made available for evaluation purposes upon request.

All Occupational Health and Safety records generated to demonstrate compliance with the Management System shall be legible, stored and maintained in an area or environment that minimises deterioration, damage and to prevent loss.

Audit

Occupational Health and Safety audits and reviews are an essential element of the Management System, to meet this element a system and audit schedule shall be planned by the Director. It will be completed by designated employees who are in a position to perform an objective and impartial audit. This will ensure continued compliance of UPA Ltd Occupational Health and Safety Management System, supporting processes and procedures.

These audits focus on the performance of the Occupational Health and Safety Management System. UPA Ltd maintains an annual documented programme for the completion of ongoing internal system review and the relevant records are produced to identify areas of conformance and non-conformance.



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Definitions

Health and Safety Personnel

The person responsible for occupational health and safety are the Directors who will ensure that appropriate resources are available

Joint Consultation

Arrangements have been made for regular discussions regarding health, safety and welfare

Safety Representation

Arrangements have been made for employee appointed safety representatives, to fulfill their statutory functions with respect to health and safety at work

Information, Instruction and Training

Adequate information, instruction and training are given to all employees, so that they may carry out their duties and obligations in a safe manner, reflecting the legislative requirements and that of this policy

Workplace (Health, Safety and Welfare) Personal Protective Equipment

All environmental aspects and conditions of the workplace are assessed

Personal protective equipment will only be used as a last resort where the risks to health and safety cannot be adequately controlled by other means, which are equally or more effective. If the risk to health and safety cannot be adequately controlled by other means, employees will be issued with personal protective equipment and training in its use. All personal protective equipment will be suitable and compatible to the employee

Plant, Equipment, Processes and Materials

An assessment and monitoring system is established to ensure that the potential hazards associated with the introduction, use and servicing of plant, equipment, processes and materials are identified, and appropriate measures are taken to ensure the health and safety of all employees
Plant and equipment, including protective devices, will be kept in safe working order and good standards of housekeeping maintained

Special Hazards

Any highly dangerous or unusually hazardous operations, either carried out by employees or by others will be identified and the necessary precautions determined and implemented
Where appropriate, a ***Permit to Work*** system must be established and implemented to ensure the health, safety and fire precautions relevant to the particular circumstances of each job are specified

Display Screen Equipment

All operations and workstations used within the Company will be suitably and sufficiently analysed in order to assess the risks to health and safety of the employee so that those risks may be reduced to the lowest level so far as is reasonably practicable



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Noise at Work	All machinery, plant and processes will, so far as is reasonably practicable, be purchased and protected so as not to emit more than 80 dB(A). In the event that a level in excess of 85 dB(A) is present, hearing protection – either in the form of earplugs or ear defenders – are provided, which give the appropriate protection to the particular source of noise and must be worn
Control of Substances Hazardous to Health	Assessments for all substances are made to ensure that those substances are controlled or protected against in such a manner as to ensure a minimal risk to the health of the user, or of other persons who may be affected, by adopting suitable and efficient precautions
Manual Handling	All Manual Handling operations, which involve a risk of injury, should be avoided, so far as is reasonably practicable. Where this is not practicable, a suitable and sufficient assessment will be carried out in order to take appropriate steps to reduce the risk of injury to the lowest level reasonably practicable
Emergency Plans	While all reasonable steps are taken to ensure health and safety standards in the workplace are complied with, incidents do occur due to situations and conditions outside of our control. In order for us to minimise such incidents an emergency plan has been introduced and implemented
Contractors	Only approved contractors are allowed to work within UPA Ltd and will be made aware of the requirements of this policy, where deemed necessary
Visitors	The safety of visitors to UPA Ltd will be ensured by the principal host / contact. Visitors will be required to observe all safety rules. Protective clothing will be provided and worn where deemed necessary. The principal host / contact concerned will be responsible for ensuring compliance
Employees Working Off Site	Arrangements will be made to ensure the health and safety of employees who are engaged in performing their duties at another person's premises
Monitoring and Investigation	Arrangements for the periodic monitoring of the health and safety precautions and standards have been made and are maintained A register of all occurrences of occupational ill-health and injuries is kept and all major injury and lost time accidents, notifiable dangerous occurrences and diseases are reported, recorded and investigated Appropriate corrective action is taken with respect to any defect or unsatisfactory condition discovered as soon as reasonably practicable
Occupational Health and Safety	Adequate occupational health, hygiene and first aid facilities are provided



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Temporary Workers

Temporary workers are covered by this policy in the same manner as full time employees, and no distinction is made as to the training and personal protective equipment given to carry out the task safely



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Section 4(d)

POLICY STATEMENTS



HEALTH AND SAFETY POLICY STATEMENT

The Company regards health and safety to be a priority and an integral part of all its operations, including the maintenance of quality systems and standards. To help achieve this, the Company will set and publish objectives and targets, within the scope of the management system, to achieve continual improvement.

The Company considers health and safety to be a management responsibility equal to that of any other function. It is therefore the policy of the Company to provide and maintain a working environment that is, so far as is reasonably practicable, safe and without risks to health, adequate as regards welfare facilities and to ensure that persons not in the Company's employment are not exposed to risks, which may arise from the Company's undertaking.

The Company will provide and maintain equipment and systems of work, which are so far as is reasonably practicable safe and will provide such information, training and supervision as is necessary.

The Company will provide such resources as may be necessary to enable it and all its employees to meet their health and safety responsibilities and to take a proactive approach to compliance with current health and safety legislation that affects all aspects of the business.

In order to implement this policy the commitment of everyone concerned is necessary and it is a condition of employment that all employees will co-operate with the Company by:

- ✓ Following instructions in the safety rules or notices on the premises and elsewhere.
- ✓ Complying with any code of practice and guidance, which may apply to their work or workplace.
- ✓ Taking reasonable care for the health and safety of themselves and of the persons who may be affected by their acts or omissions whilst at work.

The Company stresses its commitment to health and safety to the extent that where disregard to safe working practice by an employee that puts at risk the health and safety of themselves or any person will be considered as gross misconduct, which may lead to disciplinary action and/or dismissal.

The policy will be reviewed regularly and the Company will ensure that it is kept up to date and the policy will be reviewed and the Company will ensure that it is kept up to date and the policy will be reviewed and the Company will ensure that it is kept up to date.



1/10/24

ENVIRONMENTAL POLICY STATEMENT



HEALTH AND SAFETY POLICY STATEMENT

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The Company stresses its commitment to health and safety to the extent that where disregard to safe working practice by an employee that puts at risk the health and safety of themselves or any person, will be considered as gross misconduct, which may lead to disciplinary action and or dismissal.

The policy will be kept up to date, particularly as the business changes in nature and size. To ensure this, the policy and the way it is operated will be reviewed every year for a continual improvement in performance.

Signed

Date

1/10/26

Neil Alderson – Group Managing Director

ENVIRONMENTAL POLICY STATEMENT

Title:	Health and Safety Policy Statement				
Number:	SHE/PS/001	Version:	1	Date:	24/01/14
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All employees of UPA Ltd are passionate about environmental protection and we actively seek to minimise the environmental aspects and impacts associated with our operations. In addition, UPA Ltd is committed to provide information, instruction and training to ensure we meet our environmental objectives and targets.

UPA Ltd is committed to the careful stewardship of the environment and its natural resources. To fulfill this commitment UPA Ltd will endeavour to:

- ✓ Ensure that appropriate environmental training is provided for all employees in environmental matters relevant to their work
- ✓ Provide effective advice and environmental instruction, information and training to assist clients to meet their requirements for environmental best practice, prevention of pollution and legal compliance
- ✓ Control our own activities to ensure prevention of pollution and compliance with environmental legislation and other requirements

Ensure continual improvement of our environmental performance through:

- ✓ Monitoring and measuring our energy consumption and promoting energy efficiency
- ✓ Contributing to projects run by our clients to balance unavoidable emissions
- ✓ Elimination, reduction, reuse and recycling of our waste streams where possible
- ✓ Consider the environmental performance of suppliers and subcontractors when selecting services and products, whilst also making a conscious effort to select environmentally preferable materials and products

The organisation is committed to the continual improvement of the significant internal and external environmental aspects and impacts of its operation. Setting and reviewing environmental objectives and targets will drive the organisation towards these goals.

Signed

Date 1/10/26

Neil Alderson – Group Managing Director

Title:	Health and Safety Policy Statement				
Number:	SHE/PS/001	Version:	1	Date:	24.01/14
					Page 2 of 2



The UPA Group Quality Vision

"UPA aim to achieve and deliver the best products & services for the equipment rental sector and to ensure the complete satisfaction of all customers and stakeholders"

The UPA Quality Assurance Policy

UPA is one off the leading suppliers of equipment for rental and will continue to apply the aspects of Quality Management within the business management system.

UPA aims to ensure the principles of quality assurance are integrated into our products and service delivery.

UPA will:

- Ensure that they actively promote awareness of quality assurance internally amongst our systems, products and services.
- Invest in personnel and new technologies with the goal of developing and improving our systems, products and services
- Communicate & incorporate quality assurance into the vision and values of the organization through appropriate methodology.
- Continually improve operational performance through the understanding of the business requirements & the setting of clear objectives.
- Ensure employees are given adequate training in all matters relating to quality assurance and its implementation.
- Seek to influence contractors and other stake holders to comply with UPA's Quality Assurance Policy.

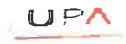
The UPA Board of Directions and employees are dedicated to adopting and supporting the Quality Assurance Policy. UPA will communicate and promote acceptance of this policy to everyone working for or on behalf of the organization. This policy forms a framework for activities and decision making processes and promotes engagement of the entire organisation.

NEIL ALDERSON
UPA Managing Director:

Date: 1/10/26

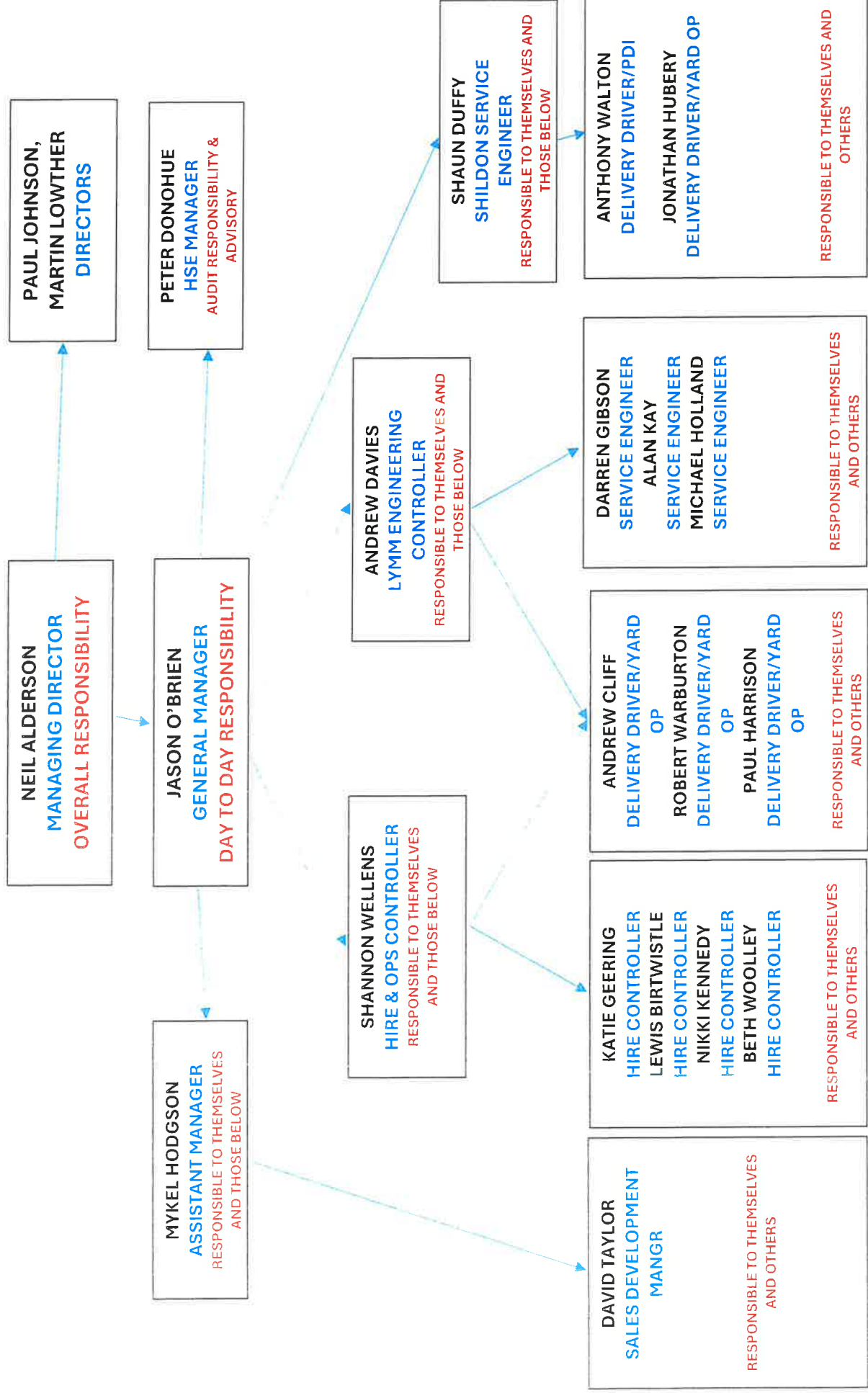
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Section 6(f)

ORGANISATION & RESPONSIBILITIES



SIGNED:

JASON O'BRIEN, GM, 28/09/2026



Section 7

HIRE AND OPERATIONS CONTROLLER

- 7.1 The Hire and Operations Controller has the responsibilities as for other employees with the additional responsibilities detailed below.
- 7.2 The Hire and Operations Controller is responsible for the health and safety on a day to day basis of employees under his control. The Hire and Operations Controller must encourage good standards of health and safety and needs to ensure that the arrangements in this policy are adhered to by their staff at all times.
- 7.3 The Hire and Operations Controller will report all health and safety matters including all accident and incident reports to the Directors and HSE Manager. Any reports from employees under their control will be dealt with by the Supervisor in accordance with the circumstances and the risk to health and safety.
- 7.4 In particular, the Hire and Operations Controller will be responsible for :
- Ensuring that their staff use the correct procedures, including the use of any guards or control measures
 - Ensuring that their staff wear the appropriate personal protective clothing / equipment
 - Keeping their area of the workplace clean and tidy and without obstructions or other risks to slips, trips and falls
 - Adequately supervising staff appropriate to their experience, knowledge and training
 - Giving proper information, training and instruction to their staff in relation to health, safety and welfare
 - Answering queries from staff promptly or referring the matter to the Directors
 - Ensuring equipment used by staff is maintained in a safe manner
 - Providing an example to staff in all matters relating to health and safety
 - Liaise with all clients / contractors to ensure agreed arrangements are observed at all times
 - Arrange for all fixed and mobile plant to be made safe and secure, whilst not in use
- 7.5 The Hire and Operations Controller will need to discuss and communicate health and safety matters to their staff and should always be included in any on-site discussions.
- 7.6 The Hire and Operations Controller is responsible for reporting non-compliance with this safety policy to the Director.
- 7.7 Other responsibilities to be included as agreed by the Directors.



Section 8

EMPLOYEES

- 8.1 UPA Ltd employees have both responsibilities in criminal law and common law not to endanger themselves or others in connection with work. In addition employees have a responsibility under the contract of employment.
- 8.2 The legal responsibilities under health and safety law are primarily contained under Health & Safety at Work, etc. Act (HASAWA) 1974 and Management of Health and Safety at Work Regulations (MHSWR) 1999. These responsibilities will be covered at induction and in any on-going training, however the requirements are reproduced in full beneath.

‘HASAWA Section 7: General duties of employees at work. It shall be the duty of every employee while at work –

- a) to take responsible care for the health and safety of himself and of other persons who may be affected by his acts or omissions at work; and
- b) as regards any duty or requirement imposed on his employer or any other person by or under the relevant statutory provisions, to co-operate with him so far as is necessary to enable the duty or requirement to be performed or complied with.’

‘MHSWR Regulation 14: Employees duties (1) Every employee shall use any machinery, equipment, dangerous substance, transport equipment, means of production or safety device provided to him by his employer in accordance both with any training in the use of equipment concerned which has been received by him and the instructions respecting that use which have been provided to him by the said employer in compliance with the requirements and prohibitions imposed upon that employer by or under the relevant statutory provisions.

- (2) Every employee shall inform his employer or any other employee of that employer with specific responsibility for the health and safety of his fellow employees –
- a) of any work situation which a person with the first mentioned employee’s training and instruction would reasonably consider represented a serious and immediate danger to health and safety; and
 - b) of any matter which a person with the first mentioned employee’s training and instruction would reasonably consider represented a shortcoming in the employer’s arrangements for health and safety.



- 8.3 Employees need to look after their own health and safety and equally look after the health and safety of others that might be affected by what they might or might not do.
- 8.4 Employees in particular need to:
- Follow any instructions, information or training given
 - Follow the arrangements and information contained in this safety policy and other guidance which is given
 - In any cases of doubt ask the Hire and Operations Controller
 - Follow all instructions, etc, from the Hire Desk Controller and Hire and Operations Controller
 - Observe and have regard to the various signs and notices displayed
 - Always use personal protective equipment provided.

**Section 9(f)****RISK ASSESSMENT**

Ref: The Management of Health and Safety at Work Regulations

Policy

1. This safety policy forms part of the Company risk assessment and details the main prevention and protective measures required to reduce risks so far as is reasonably practicable.
2. The ways in which risks can be reduced are many but start with the Company's intention to comply with the Health & Safety at Work etc. Act 1974 and its supporting Acts and Regulations.
3. Hazards identified, arising out of the Company's undertaking include:
 - a) Electrical
 - b) Fire
 - c) Machinery and Plant
 - d) Hazardous Substances
 - e) Noise
 - f) Manual Handling
 - g) Working at Height
 - h) Scaffolding
4. The risk of the various hazards identified depends on the employee's particular task. However, certain tasks are only designated to certain workers, normally those trained to carry out the tasks and therefore exposure to hazards is limited to certain employees who have the knowledge, skill and experience to understand the hazard and guard against it.
5. The above hazards identified are all included in a chapter within this safety policy.
6. In general terms risks are reduced by the following company policies and arrangements :
 - 6.1 The attitude and high regard to health and safety by the Hire and Operations Controller supported by the statements made within this policy.
 - 6.2 The Company managing health and safety and having an organisation for health and safety with employees designated to certain health and safety responsibilities and tasks.
 - 6.3 The Company having a system built into the organisation for self monitoring and inspection of various parts of its premises, systems, machinery, equipment, etc, and having a system of reporting and regularly discussing health and safety at management level.
 - 6.4 The policy of removing the hazard or source or by substitution thus avoiding risk altogether.

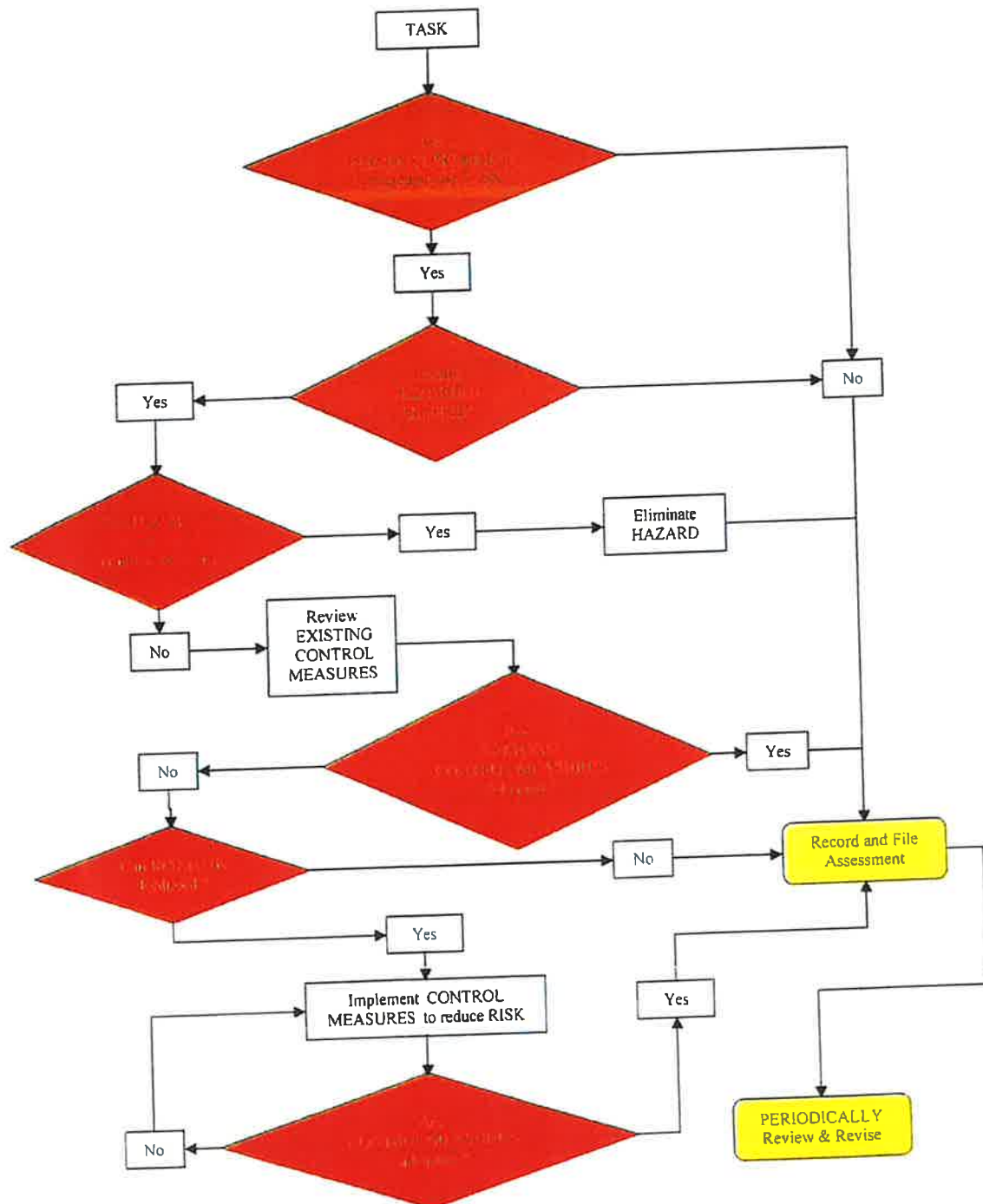


- 6.5 Combating risks at source.
- 6.6 Adapting work where possible to suit the individual employee.
- 6.7 Examining and using technological and technical progress for improving working methods and making them safer.
- 6.8 Progressively examining and undertaking ways to reduce risks which cannot be altogether prevented.
- 6.9 Giving priority to measures that protect the whole workplace and all those who work there and so yield greatest benefit.
- 6.10 By training employees in health and safety with respect to their tasks, so that they understand what they need to do.
- 6.11 By adoption of the above the existence of an active health and safety culture.
7. Apart from the general measures the Company will take to determine the hazard and reduce risk, the Company will seek the advice where necessary of a competent person to measure and determine hazards and to carry out particular risk assessments. In certain cases this will necessitate the exact measurement of hazards and surveillance of control methods.
8. As part of the overall management system, health and safety is integrated within it and includes the four main elements of:
 - a) Planning
 - b) Organisation
 - c) Control
 - d) Monitoring

UPA Ltd seeks support and co-operation from its employees and contractors who will comply with the policies of the Company.

Procedure

9. A suitable Risk Assessment will be carried out by the Safety, Health & Environment Manager in conjunction with the Hire and Operations Controller to specific risks both on and off site
10. Training on each detailed Risk Assessment will be the responsibility of the Hire and Operations Controller in accordance with Regulation 13 (MHSWR).
11. Detailed compliance with the Risk Assessment will be the responsibility of the Hire and Operations Controller in association with the employees / contractors.
12. In accordance with Regulation 14 of the MWSWR 1999, all employees / contractors will comply with the control measures outlined within the detailed Risk Assessment.

**IDENTIFICATION OF HAZARDS & ASSESSMENT OF RISKS**

UPA Ltd

Health, Safety and Environment Policy



HEALTH & SAFETY ARRANGEMENTS



UPA Ltd

Health, Safety and Environment Policy

Sub Section G

ARRANGEMENTS

- 1) Accident Reporting / Accident Investigation
- 2) Mobile Phones
- 3) Alcohol, Drugs and Solvents
- 4) Control of Policy
- 5) COSHH
- 6) Electrical Safety
- 7) Employee Dress
- 8) Fire and Emergency Evacuation
- 9) First Aid
- 10) Mobile Elevated Work Platforms
- 11) LOLER Inspections
- 12) Hand Tools
- 13) Housekeeping
- 14) Machinery & Equipment
- 15) Manual Handling
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- 17) Non-statutory Inspections
- 18) Office Safety
- 19) Permit to Work Systems
- 20) Personal Protective Equipment and Clothing
- 21) Premises
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- 23) Review and Communication of Policy
- 24) Safety Committees
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- 28) Contractors
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- 30) Lifting Equipment and Accessories
- 31) Domestic Hire
- 32) Management and Control of Waste
- 33) Workplace, Health, Safety and Welfare
- 34) Smoking
- 35) Visitors
- 36) Stress
- 37) Hand Arm Vibration
- 38) Work Safe
- 39) Index of Legislation



Sub Section 1

ACCIDENT REPORTING AND INVESTIGATION

- 1.1 All accidents, injuries, diseases and dangerous occurrences involving employees or others on company premises / Client premises must be reported. The Company will comply with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013 and HSE guidance HSR23 'A Guide to RIDDOR'. Employees are encouraged to make themselves aware of guidance contained in HSE leaflet HSE31 relating to accidents and disease reporting.
- 1.2 Employees must report all such accidents immediately or in any case within 24 hours. All such reports will be recorded in the accident book, which will detail the person's name and give brief details of the accident, including dates, times, location and description of the events of the accident. All accidents will be investigated immediately using the standard forms.
- 1.3 All fatalities, major injury accidents and dangerous occurrences must be reported, the Safety, Health & Environment Manager will ensure that the Enforcing Authority (HSE) are notified immediately by telephone. The telephone report will be followed by the filling in of official report form F2508 within 10 days of the accident.
- 1.4 The official form F2508 shall be sent to the Enforcing Authority for all accidents to an employee who as a result of an accident is absent from normal work for more than 7 days following the accident (Time Loss Accidents).
- 1.5 All employees will report all diseases or occupational ill health as soon as they are aware or suspect they are suffering ill effects as a result, or in connection with, work. Such diseases, etc, will be recorded as for accidents and the Enforcing Authority will be notified on official form F2808A.
- 1.6 Accidents and cases of ill health will be investigated to endeavour to identify the cause of the accident or ill health. Measures for prevention will also be devised in all cases where applicable to ensure that similar accidents do not recur.
- 1.7 Full co-operation is required from all employees / contractors during any investigation by the Company, Insurers or Enforcing Authority Inspectors.
- 1.8 All entries in the accident book will be checked monthly by the Safety, Health & Environment Manager to identify any common accident trends.

The particular arrangements of UPA Ltd are detailed overleaf.



ACCIDENT REPORTING AND INVESTIGATION

The details on this page apply to all UPA Ltd premises and employees whilst on Client premises.

1. All accidents / incidents **must** be reported.
2. Accident report forms (Form No HSF 01) are kept in the office
3. The Safety, Health & Environment Manager maintains the accident book.
4. Completed accident report forms are the responsibility of the Safety, Health & Environment Manager.
5. Leaflet HSE 31 'Everyone's Guide to RIDDOR' is available from the Safety, Health & Environment Manager.
6. The person responsible for completing and returning form F2508 or F2508A is the Safety, Health & Environment Manager.
7. The persons responsible for accident investigation are the Safety, Health & Environment Manager and Hire and Operations Controller and for ensuring that all relevant information is documented.
8. The HSE Central Reporting Centre address and telephone number is:

Incident Contact Centre
Caerphilly Business Park
Caerphilly
South Wales
CF83 3GG

Tel: 0845-3009923
Fax: 0845-3009924

Note:

The purpose of these books is to record minor, non-injury accidents / near misses, which are discussed at the regular Health & Safety meetings.



Sub Section 2

MOBILE PHONES / ANCILLARY EQUIPMENT

Use of Mobile Phones 'On-Site'

- 2.1 The use of mobile phones are prohibited within all areas and must be kept locked away at all times, except during the following circumstances:
- a) When approval has been obtained
 - b) During official break times
 - c) When conducting business on Company mobile phones
 - d) When visitors / contractors are carrying out work on the UPA Ltd behalf

Use of Mobile Phones / Ancillary Equipment in "Company Vehicles"

- 2.3 No UPA Ltd employee shall use a hand held mobile phone / microphone or ancillary equipment whilst driving Company vehicles.
- 2.4 Company vehicles, where employees use mobile phones whilst driving must have a hands free kit installed in the vehicle and must be installed in such a way as not to impede the drivers vision of the road or the vehicle in front and must only be used with due care and attention at all times and that the use of does not effect their judgement and concentration, which may effect their ability to drive the vehicle safely.
- 2.5 For further guidance, reference should be made to the Road Traffic Regulations Act 1988 and the Highway Code.



UPA Ltd

Health, Safety and Environment Policy

Sub Section 3

ALCOHOL, DRUGS AND SOLVENTS

- 3.1 The Company is concerned that employees do not expose themselves or other persons to risks to their health or safety by acts or omissions at work. It is therefore the policy of the Company that employees are, so far as is reasonably practicable, fit and well for work at all times.
- 3.2 No person will be allowed to be at work if they are under the influence of alcohol, drugs or solvents.
- 3.3 Any employee who is aware of any person who is at work and under the influence of alcohol, drugs or solvents must report the matter immediately to the Hire and Operations Controller.
- 3.4 Employees who are taking medication or prescribed drugs, which may affect their actions or reactions at work must inform the Hire and Operations Controller. The Hire and Operations Controller will determine if redeployment is necessary and possible, for example to non-hazardous working.
- 3.5 The use of such alcohol, uncontrolled drugs or solvents whilst at work or under their influence at work is considered by the Company to be very serious and subject to the same disciplinary action as any act of gross misconduct.



UPA Ltd

Health, Safety and Environment Policy

Sub Section 4

CONTROL OF POLICY

- 4.1 It is the responsibility of the Company to provide and maintain this Health & Safety policy.
- 4.2 It is the responsibility of the Hire and Operations Controller for the day to day operation of this policy and the local arrangements, which form part of the policies and procedures at all levels within UPA Ltd.
- 4.3 The Hire and Operations Controller will maintain the policy and have a copy of the policy readily accessible to all staff. Staff will also have access to other health and safety information in relation to this policy and any health and safety file.
- 4.4 The Hire and Operations Controller will monitor the policy and make any local amendments and alterations as seen fit, bearing in mind always the health, safety and welfare of employees.
- 4.5 A competent person designated by the Company will audit this policy and ensure that the law, guidance, codes of practice and the duty of care are being fulfilled.
- 4.6 All employees have a legal responsibility to report defects or failings and to be involved in health and safety matters. Employees should also report any breaches of health and safety and can always go directly to the Hire and Operations Controller.
- 4.7 The Hire and Operations Controller will be responsible on a day to day basis to deal with health and safety matters.
- 4.8 In all cases the policy will be reviewed annually, considering risk assessments and any feedback from employees via "tool box talks".
- 4.9 Regard shall also be given to HSE Inspectors, Fire Officers, Insurance Advisers and other officials and their advice will be considered and the necessary amendments made as appropriate.



UPA Ltd

Health, Safety and Environment Policy

Sub Section 5

COSHH

Policy

- 5.1 The Company recognises that certain substances used at work can be dangerous or hazardous depending on the use, storage, environment, exposure and other factors including the chemical make up of the substances.
- 5.2 UPA Ltd will comply with all legislation in relation to hazardous substances, in particular the Control of Substances Hazardous to Health Regulations (COSHH), Codes of Practice and guidance issued by the HSE.
- 5.3 It is important that all employees understand the dangers and hazards associated with substances used at work and are fully aware of the precautions, which are needed to prevent and reduce any risks to their health and safety. The Company will identify preventative measures, which will be brought to the attention of all employees.

Procedure

- 5.4 The procedures for dealing with hazardous substances will be as follows:
 - a) All potentially hazardous substances will be identified and included with all those substances classified as HARMFUL, TOXIC, VERY TOXIC OR IRRITANT.
 - b) All substances identified above will be suitably marked with their respective warning label. Substances will also be stored in a safe manner and it's use restricted to designated personnel.
 - c) To identify hazardous substances the Company will:
 - Use information supplied with the product, etc
 - Use product data sheets
 - Observe warning notices
 - Have regard to HSE guidance and other guidance from trade associations, consultants or other competent persons
 - Use information gathered from experience in the use of a substance
 - Refer to technical publications
 - d) All hazardous substances identified will be subject to a risk assessment as required under Regulation 6 COSHH. All employees need to be aware that substances include not just liquids but also dusts, fumes, solids and any other composition, which can be hazardous to health.



UPA Ltd

Health, Safety and Environment Policy

- e) Assessments will only be carried out by those persons deemed competent and trained to do so. Assessments will be suitable and sufficient and will include:
 - An assessment of the risks to health
 - The steps which need to be taken to achieve adequate control of the exposure (in accordance with regulation 7)
 - Identify other actions that may be required (by virtue of regs 8-12)
 - f) Assessments will consider the following:
 - What substances the employees are exposed to
 - What effects the substances may have, including the sources and mode of entry i.e., absorption, injection, inhalation and ingestion
 - Where the substances are present and in what form
 - The ways in which and the extent to which any employee or groups of employees are at risk, taking into account the nature of the work, processes, environment and any other factors
 - An estimate of the exposure
 - Where valid standards exist, representing an adequate control and a comparison of the estimate with these set standards.
 - g) If comparison shows that control is likely to be or become inadequate then the assessment will go on to determine the steps or further steps that need to be taken to obtain and sustain adequate control.
 - h) The assessment may require the carrying out of sampling or other measurement to determine the exposure. In certain cases, if deemed necessary, an 8 hour personal sampling measurement will be undertaken.
 - i) The assessment will be recorded and kept by the Safety, Health & Environment Manager. The record of the assessment will also be available with the product, where it is stored or used, whichever is the most appropriate.
 - j) All employees will be trained in the use of any such substances identified as hazardous and in accordance with the assessment.
 - k) Assessments will be reviewed whenever there is evidence to suspect that the assessment is no longer valid or circumstances have changed substantially.
- 5.5 The Company will ensure that as a result of the assessment exposure is adequately controlled. Control will be by methods other than by personal protective equipment if possible, which will be the last resort.



5.6 The following methods of preventing or controlling hazardous substances will be considered and followed where appropriate:

- Elimination of the use of the substance
- Substitution of the substance with a less hazardous one

For controlling exposure:

- Enclosing processes and the substance
- Engineering and process systems which reduce exposure
- Partial enclosure and local exhaust ventilation (LEV)
- LEV
- General ventilation
- Reduction in the number of employees exposed
- Reduction in the length of exposure time
- Regular cleaning, maintenance and disinfection
- Provision for the safe and suitable storage of the substance
- Suitable and effective disposal
- Suitable personal protective equipment
- Prohibition of eating, drinking and smoking
- Provision of adequate welfare arrangements

The selection of PPE will be determined after considering the following:

- a) the ability of the material to resist penetration by a substance where the risk is by absorption
- b) the adequacy of the design of the clothing and whether it is suitable for its intended use
- c) the environment in which it will be worn
- d) in the case of dust, the dust release characteristics of the material

5.7 UPA Ltd will ensure that control measures, PPE and other measures are properly used or applied and every employee must make full and proper use of these control measures and must report any defects in these measures or the PPE that is being used.

5.11 Assessment

- a) A suitable detailed COSHH Assessment will be carried out by the Safety, Health & Environment Manager for specific chemicals and other substances used on site.
- b) All necessary control measures, as identified, will be implemented without delay.
- c) Training in COSHH Assessments will be the responsibility of the Safety, Health & Environment Manager
- d) Detailed compliance with COSHH Assessments will be the responsibility of the Safety, Health & Environment Manager and Hire and Operations Controller.
- e) It is Company Policy that employees will only use hazardous substances in accordance with the information, instruction and training, which they have been given.

Sub Section 6**ELECTRICAL SAFETY**

- 6.1 The Company aims to comply with the Electricity at Work Regulations and guidance from HSE contained in HS (R) 25 'Memorandum of Guidance on the Electricity at Work Regulations'. In addition the Company will also comply with other codes of practice, guidance and current edition of IEE Regulations (18th Edition).
- 6.2 Electrical work and installation will only be carried out by those persons deemed to be competent to do so.
- 6.3 Electrical hazards arise from poor design, construction and installation, inadequate standards of maintenance, or misuse and incorrect operation. The Company will reduce these hazards to a minimum by the use of competent persons, using safe systems of work, approved materials and equipment and through regular testing and inspection.
- 6.4 Staff who need to use electrical work equipment must report any fault or defect immediately to the Hire and Operations Controller. *Staff must not attempt to carry out any repairs or interfere with any equipment unless they are designated as competent to do so.*
- 6.5 As soon as staff becomes aware of any defect they should immediately stop using the piece of equipment by removing the power source and report it as indicated above.
- 6.6 **Testing**
- All electrical equipment will have at least a visual inspection before it is used. Routine inspection and preventative maintenance are essential if accidents are to be avoided. All portable appliances, including extension leads, will be recorded in a register. The register will indicate how often each item should be recalled for routine inspection and maintenance. The frequency of the recall will depend on the type and use of the appliances based on an assessment of risk and will always consider the manufacturers recommendations.



- 6.7 In relation to other equipment, employees must have regard in particular to the following:
- a) Strength and capability of the equipment
 - b) Adverse or hazardous requirements or circumstances
 - c) Insulation protection and placing of conductors
 - d) Earthing and other precautions
 - e) Integrity of reference conductors
 - f) Connections
 - g) Means of protection from excess of current
 - h) Means of cutting off the supply and for insulation
 - i) Precautions for work on equipment made dead
 - j) Work on live conductors
 - k) Work space, access and lighting
 - l) Persons to be competent to prevent danger and injury
 - m) Overhead cables
- 6.8 In addition to the above the Company will have regard to guidance given by HSE as follows:
- GS27 Protection against electrical shock
 - GS37 Flexible leads, plugs, sockets, etc
 - GS38 Electrical test equipment for use by electricians
 - GS44 Electrical working practices
 - HG(G)13 Electrical testing
- 6.9 Any electrical shocks suffered by any employee must be reported immediately and entered into the accident book.



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Health, Safety and Environment Policy

Sub Section 7

EMPLOYEE DRESS

- 8.1 All employees must dress in such a manner that is appropriate for their job having regard to Personal Protective Equipment and Clothing.
- 8.2 Employees must not wear any jewellery, including dangling chains, which are liable to cause danger or increase the risk of injury. Employees should be aware of the dangers of wearing any loose, baggy or hanging clothing that can become trapped or entangled in machinery / equipment. Long hair must be tied back to avoid potential contact with machinery / equipment.

Protective footwear to Company specification must be worn at all times.

UPA Ltd Dress Code

In order that the principles of dress are observed, and to ensure consistency, all employees are requested to note and comply with the undermentioned:

- All standard issue garments, which are supplied by the Company will remain the property of the Company.
- Ensuring that garments are in a clean condition remains the responsibility of the employee and if noted to be in an unclean condition disciplinary action may be taken to ensure compliance.
- In areas where it is necessary to wear protective safety clothing, employees are asked to observe the instructions regarding this, whether mandatory or advised, and use those items of clothing, which are provided. Should there be concerns regarding the availability of such safety clothing, the matter must be immediately raised with the Hire and Operations Controller.



Sub Section 8

FIRE and EMERGENCY EVACUATION

- 8.1 UPA Ltd and its employees will comply with all fire precautions in accordance with the Fire Precautions Act and associated Regulations and recommendations made by the Local Fire Prevention Officer (FPO) and Clients rules and procedures whilst on all Client premises. Regard shall also be given to the fire risk assessment and preventative measures devised as a result.
- 8.2 All fire fighting equipment, means of escape and warning systems will be maintained at all times on UPA Ltd premises.
- 8.3 The fire fighting equipment will be positioned around the premises in accordance with the fire certificate. Various fire signs will indicate the position of extinguishers. Extinguishers will be provided which are appropriate to the circumstances. All staff will be made aware of the position of these fire extinguishers.
- 8.4 Means of escape in case of emergency are marked on the plan attached to the appropriate Fire Certificate. All staff will be required to be aware of the exits in their area and the location of their assembly point.
- 8.5 All means of escape must be available for use at all times. Access to the means of escape must be kept clear and unobstructed. All staff are responsible to maintain the escape routes and report any defects.
- 8.6 Staff on discovering a fire should immediately raise the alarm and:
- ✓ Leave the building / area as quickly as possible by the nearest safe escape route, assisting any disabled person(s) on the way
 - ✓ Do not stop to collect personal belongings
 - ✓ Report to assigned assembly point
 - ✓ Do not re-enter the building until the "All Clear" has been given



UPA Ltd

Health, Safety and Environment Policy

8.7 As part of staff training, all staff must be made aware of the following:

- ✓ General fire prevention principles
- ✓ Action to take on discovering a fire
- ✓ Means of raising the alarm
- ✓ Action to take on hearing the alarm
- ✓ Stopping all machinery and operations
- ✓ Location of the fire fighting equipment
- ✓ Means of escape
- ✓ Assembly points

8.8 A fire log book will be maintained and updated by the Hire and Operations Controller.

8.9 The Hire and Operations Controller will inspect the premises to ensure the fire arrangements are being maintained and will ensure a fire risk assessment is carried out annually. Fire fighting equipment will be checked annually by a competent person or organisation.

8.10 Suitable notices and signs will be displayed throughout the premises in line with the Safety Signs Regulations.



UPA Ltd

Health, Safety and Environment Policy

Sub Section 9

FIRST AID

- 9.1 The Company, in making adequate arrangements for first aid, will comply with the Health & Safety (First Aid) Regulations and HSE Approved Code of Practice L74 'First Aid at Work'.
- 9.2 The Company will maintain an adequate number of qualified first aiders in order to provide first aid cover at all times.
- 9.3 The Safety, Health & Environment Manager will be responsible for recording details of first aiders and will maintain the details of first aid certificates with dates of training and any refresher training that has been carried out in accordance with HSE approved list of courses and course providers. The Safety, Health & Environment Manager will arrange this training and any associated refresher training that may be required.
- 9.4 The purpose of any first aider dealing with an injured or ill person is to sustain life and maintain the condition of that person until professional assistance arrives. In the case of an emergency the employee must be taken to the treatment room for the appropriate assessment and treatment (if possible) or to await the arrival of an ambulance. It is the responsibility of the first aider in association with the Hire and Operations Controller to call for an ambulance where it is deemed necessary. In addition first aiders have the authority to send the employee Home, to Hospital or to their GPs if deemed necessary.
- 9.5 First aid kits will be kept in accordance with current legislation and guidance. The Safety, Health & Environment Manager is responsible for the maintenance of the first aid kits, their materials and availability at all times.
- 9.6 No medicines, drugs or other medication will be administered to an employee.
- 9.7 Adequate instruction, training and information will be provided to employees so that they are aware of the above arrangements, including the location of equipment, materials and first aid personnel.
- 9.8 All first aid treatment will be logged and maintained for future reference.

Sub Section 10**MOBILE ELEVATED WORK PLATFORMS**

- 10.1 The use of Mobile Elevated Work Platforms (MEWP), present a number of risks to those exposed to their use. In particular there is the risk of being struck and the MEWP overturning. Other risks include the equipment failing, materials being struck, falling objects and materials, entrapment and in the mis-use of the MEWP.
- 10.2 Risk assessment will identify the requirements of any secondary requirements to be fitted to any MEWP particularly the identification and use of anti-entrapment devices.
- 10.3 Only IPAF trained operatives will be allowed to operate these vehicles. The Company will adequately train and authorise certain staff to drive these vehicles.
- 10.4 All authorised operators will have attended an approved training course (IPAF) and will be classed as competent to operate the MEWP and the tasks required of them.
- 10.5 All designated operators will need to be in good general health with adequate vision and hearing.
- 10.6 No matter what time of the day it is, operators are responsible for completing the daily check sheet prior to that vehicle being driven whether they are the first person to operate the vehicle or not.
- 10.7 Operators will need to at least, for health and safety reasons, adhere to the following precautions:
 - Under no circumstances should any driver operate a faulty vehicle
 - Under no circumstances should any driver override any safety device
 - The maximum safe working load (SWL) must never be exceeded
 - By ensuring compliance with charging and re-filling procedures
 - Regulate speed and observe the surroundings
 - Use the horn whenever turning a blind corner
 - Wearing all required PPE
 - Travel in the correct travel position at all times
 - Use the prescribed travel routes, never cutting corners
 - Adjust speed and take extra care whilst on wet or uneven surfaces
 - Care must to be taken with overhead cabling, openings, ducting, pipework
 - When leaving the vehicle unattended for any periods, place the controls in neutral, switch the power off, apply the brake and always remove the key



10.9 Rescue from Above Ground Level

Should an operative become injured, suspended or trapped, immediate action will be taken to rescue the operative concerned.

In the event of the operative being injured or showing any signs whatsoever of shock, discomfort or restricted movement the emergency services will be called immediately.

The following will be adopted if possible and safe to do so, if not, the emergency services will be called immediately.

- ✓ The MEWP will be lowered to the ground using the controls at ground level.
- ✓ If it is not possible to use the controls at ground level and there is another MEWP available it will be positioned immediately adjacent to the stricken MEWP and will ascend to the injured, suspended or trapped operative.
- ✓ Once the injured, suspended or trapped operative has been released and is safely within the platform area, the MEWP will descend.
- ✓ Following retrieval the operative will be fully examined and the appropriate investigation will take place.



UPA Ltd

Health, Safety and Environment Policy

Sub Section 11

LOLER Inspections

INTRODUCTION

- 11.1 The aim of United Powered Access (UPA) is to provide the UK with Mobile Elevated Work Platforms, which are safe and without risks to the health and safety of its customer base in line with the requirements of the Lifting Operations and Lifting Equipment Regulations (LOLER).
- 11.2 UPA will maintain all Mobile Elevated Work Platforms in efficient working order. All Mobile Elevated Work Platforms will have a routine and planned maintenance programme.
- 11.3 Safe systems of work for the maintenance, inspection and examinations of Mobile Elevated Work Platforms may include the isolation from sources of energy, prior to the work being carried out.
- 11.4 The UPA Service Engineer carrying out the thorough examinations has the appropriate practical and theoretical knowledge, engineering expertise and experience to enable him to detect material defects or weaknesses during the examinations.

PROCEDURE

- 11.5 The Syrnix system flags up to the UPA Hire and Operations Controller 31 days in advance when the 6 monthly LOLER examination is due for each individual Mobile Elevated Work Platform.
- 11.6 The UPA Hire and Operations Controller prints the report and arranges a meeting with the UPA Service Engineer to plan the work schedule for the following month.
- 11.7 The UPA Hire and Operations Controller arranges with the customer when required when the LOLER examination is to be carried out if working out on site.
- 11.8 The UPA Service Engineer carries out the 6 monthly LOLER examination on the Mobile Elevated Work Platform within 31 days of the expiry of the examination due date and if the MEWP of a diesel power he will also service this as well during the examination.



11.9 Dating procedure for LOLER examination reports:

- a, Date of last examination (past)
- b, Date of expiry (past)
- c, Date of examination (present)
- d, Date of expiry (present)

The LOLER examinations will be carried out within 31 days of the expiry date with the start date being the day before the original date of expiry i.e. if due on the 28th and the LOLER examination is carried out on the 6th the date of expiry will remain as the 28th

- 11.10 All faults inclusive of damage and malfunctions identified during the examination must be reported to the UPA Hire and Operations Controller or in his absence the Safety, Health and Environment Manager.
- 11.11 The UPA Service Engineer fully completes the LOLER examination report following his examination of the Mobile Elevated Work Platform and returns the report to the UPA Hire and Operations Controller.
- 11.12 Once in receipt of the report and no remedial action is required the UPA Hire and Operations Controller will scan the report then update the Syrinx system and attach it to the machine records within the machine maintenance file.
- 11.13 The UPA Hire and Operations Controller will then:
 - a, Laminate the white copy of the report for security purposes and place within the machine file held at the UPA office.
 - b, Send the pink copy to the Safety, Health and Environment Manager for archive and auditing purposes.



UPA Ltd

Health, Safety and Environment Policy

Sub Section 12

HAND TOOLS

- 12.1 Hand tools, including knives and all maintenance equipment, are classed as work equipment and as such need to be considered in line with section Machinery and Equipment.
- 12.2 All hand tools must be used for the job they are intended for.
- 12.3 Employees need to use hand tools in a proper manner and in line with any training given in the use of hand tools.
- 12.4 Hand tools need to be maintained in an efficient working condition. Any defects need to be reported and repaired immediately.
- 12.5 Electrically powered hand tools will comply with BS2769, and unless 'all insulated' shall be effectively earthed.
- 12.6 Hand tools need to be stored properly and not be subject to substances or articles, which may affect their safe use.
- 12.7 Employees must take proper care when using hand tools so that they do not expose themselves or others to any undue risk. Any employee who is unsure of the correct use or method of work should speak the Hire and Operations Controller and request the appropriate training.



UPA Ltd

Health, Safety and Environment Policy

Sub Section 13

HOUSEKEEPING

- 13.1 The general tidiness and cleanliness of the premises in general is a reflection of UPA Ltd and its employees. In addition the general housekeeping is a reflection on the standards of health and safety and can contribute greatly to reduced risks and reduced accidents.
- 13.2 All employees are responsible for the general state of the premises for rubbish and debris. Employees must dispose of any waste material in the containers provided and must not allow accumulations of any material. Such disposal / storage includes segregation to allow for environmental issues concerning each site.
- 13.3 All employees must keep their own floor areas clean and tidy. Aisles need to be kept free, not only from solid objects but also from any fluid or liquid. Any such spillages must be cleaned up immediately using appropriate cleaning materials and observing the proper warning signs during and after the operation.
- 13.4 No combustible materials must be allowed to accumulate and all means of access and egress must be kept free from any object or anything, which is likely to affect the safe means of access and egress.

(Employees will be responsible for clearing away any mess or surplus material and placing them in the relevant containers.)
- 13.5 Any particular accumulations of dirt or waste should be reported by employees to the Hire Desk Controller and Hire and Operations Controller, but it is stressed that the general cleanliness and hygiene is the responsibility of all employees.



Sub Section 14

MACHINERY AND EQUIPMENT

- 14.1 The Company aim is to provide equipment for employees to use at work which is so far as is reasonably practicable, safe and without risks to health. To comply with this aim, the Company will satisfy the requirements of all legislation in relation to equipment and in particular the Lifting Operations and Lifting Equipment Regulations (LOLER) Provision and Provisional Use of Work Equipment Regulations (PUWER).
- 14.2 The Company will endeavour to ensure that the right equipment is purchased. Prior to use, equipment will be checked and any instructions or information in manuals will be considered. Information, instruction and training will be given to employees who will use work equipment. Such training will include the risks and the preventative and protective measures, the correct use of guards, systems of work and any personal protective clothing, which is required to be worn.
- 14.3 Employees must not use any equipment unless they are capable of doing so and have received the necessary information, instruction and training. All such training will be recorded and held by the Hire and Operations Controller.
- 14.4 Employees must report any damage malfunction or unsafe work equipment to the Hire and Operations Controller. Employees must never interfere with or attempt to repair any equipment unless authorised to do so.
- 14.5 All equipment will be maintained by the Company in efficient working order. Particular equipment will have a routine and planned maintenance programme.
- 14.6 Proper and safe procedures will be adopted for maintenance of equipment and this includes the proper isolation of sources of energy.
- 14.7 The following general principles will be applied in line with PUWER 1998.
 - a) Identifying the hazard – the main risks associated with equipment are: contact; entanglement; being struck by ejected particles, trapping; nips, burns through friction contact; being struck by materials being machined.
 - b) Eliminating or reducing the hazard – using enclosed areas by guarding, using recognised manufacturers, filling in any gaps, etc.
 - c) Using safeguards – trip devices, electrosensitive systems, two hand control devices and mechanical devices using interlocks.
 - d) Using safe working practices – physical safeguards reduce risk, however safe systems of work must be adopted, including planning, setting, use, adjustment and maintenance.



UPA Ltd

Health, Safety and Environment Policy

Sub Section 15

MANUAL HANDLING

- 15.1 The Company accepts that there is a risk of injuries to employees from manual handling operations. The Company, to prevent and reduce those risks will comply with the requirements of Manual Handling Operations Regulations and guidance given by the HSE.
- 15.2 As a starting point, no employee will be expected to and must not move any load which they think is liable to cause injury. Employees should have regard to good manual handling techniques and follow the systems of work devised, including the use of any aids provided. Such aids will include the use of pallet trucks, fork lift trucks and the conveyor lift systems.
- 15.3 Employees who have to carry out manual handling operations will be adequately trained in the process and the best way to move loads so as to reduce the risk of injury.

Identification of Manual Handling Needs

- 15.4 The company will identify all manual-handling operations via Risk Assessments and this includes pushing, pulling, lifting, carrying and supporting a load. The Company will use a trained and competent person to assess the risks from manual handling operations identified.
- 15.5 In the first instance, if the task can be avoided then it should be. Secondly, if the task can be automated or mechanised it will be assessed to reduce the risks to the lowest level so far as is reasonably practicable.
- 15.6 All remaining manual handling operations which involve a risk of injury and can not be avoided, automated or mechanised, will be assessed to reduce the risks to the lowest level reasonably practicable.

Assessment Procedure

- 15.7 Manual handling assessments will be carried out by the Safety, Health & Environment Manager in conjunction with the employees who are carrying out the task. These assessments will examine the manual handling operations and determine the measures that need to be put into place to prevent or reduce the risk. These risk assessments and the preventative and protective measures will be made available to all employees.



Good Lifting & Handling Practice

The safest and best way of lifting a load will vary depending on the size, shape and weight of the object you need to move. However, there are a few general principles that will help you ensure you are getting it right.

Stop & Think

The first and probably the most important step in lifting safely is to stop for a moment and think. Think about the object you are going to lift, how you are going to lift it and what you need to do once you have lifted it. It is at this stage you should identify any hazards that may be involved in the operation. Remember, you are assessing the risks to your own health and safety. Some of the most important things to think about at this stage

Assessing the Load

- What is the weight of the load?
- Is the weight evenly distributed, is it unstable or unbalanced?
- Is it sharp or are there other hazards (eg. hot, cold, oily, etc)? Do you need protective equipment?
- Does the size or shape make it difficult to handle safely?

Assessing the Task

- Are there any mechanical aids that can be used to assist with the job?
- Do I need help with the load (even light loads may need two people to lift them safely if they are large or bulky)?
- Is the working area clean and tidy or are there any obstructions, tripping or slipping hazards that need to be removed first?

Do not forget that manual handling is not just about lifting loads, you also have to move them. It is just as important to check the route you are going to be taking as it is to check the area you are lifting in. Again remember to look for slipping and tripping hazards along the route. If you need to carry the load for any distance, consider the need to stop to take short rests or adjust your grip. If you do need to stop, try to find somewhere to place the load that is about waist height rather than on the floor – when you start of again the lift is much safer. Just a little forward planning can help make your job much safer and a lot easier at the same time.



Adopt a Good Posture

A good posture is essential to ensure safe manual handling and any good posture must start with a firm and stable base, so make sure you are wearing suitable footwear and not lifting from a slippery or unstable position. Start the lift with the feet slightly apart (around the width of your shoulders is about the right spacing). Where the size of the load allows, it is best to position your feet either side of it with your leading leg as far forward as you feel comfortable with. If you need to separate your feet much wider than the width of your shoulders to do this you should think about getting someone to help, even though the load may be fairly light. Now bend your knees so that your grip on the load is as near to the level of your waist as possible. Do not kneel or bend your knees beyond the point where it gets difficult to straighten them up again. Remember, keep the back straight (you may find tucking your chin in slightly helps). Keep your shoulders level and facing in the same direction as your hips, do not twist to one side.

Get a firm Grip

Lean forward a little over the load if it helps you to get a good grip. The best type of grip to use depends on the sort of object you will be lifting, but the most important thing is to make sure the load is not going to slip.

Use gloves wherever possible they may help improve your grip and always use them if the objects are sharp or hazardous. If you find you have to vary or adjust your grip during the move, make sure you do it as smoothly as possible.

You will find that a hook type of grip is far less tiring than keeping your fingers straight and trying to grip the side of an object.

Do Not Snatch or Jerk

All lifting and moving operations should be carried out as smoothly as possible. Snatching or jerking the load produces a strain on your body that is much higher than it would be if the operation were carried out in a smooth continuous movement. Remember that this advice also applies to tasks where you need to push or pull objects as well. If you find you need to reposition the load or change your grip after the initial lift, consider resting the load on a bench or table to do it.



UPA Ltd

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Sub Section 16

NOISE

- 16.1 The Company recognises the risk from exposure to excessive noise to employees at work. The Company will therefore comply with the Noise at Work Regulations and guidance produced by HSE.
- 16.2 The Company will, where necessary, make (and update) a noise assessment where employees are likely to be exposed to :
- a) 80dB(A) - the first action level
 - b) 85dB(A) - the second action level
- 16.3 The assessment will be made, if necessary, by a competent person and will:
- a) Identify which employees are exposed
 - b) Provide such information to carry out the Company's statutory duties
 - c) Be reviewed where the original assessment is no longer valid due to changes
- 16.4 The Company will record and keep such noise assessments.
- 16.5 The Company will in all cases try to reduce noise to the lowest level by precautions and methods other than by the use of personal hearing protection, ie. at source.

Provision of Hearing Protection

- 16.6 Where employees are exposed or may be exposed to noise levels of 80dB(A) or above, the Company will provide suitable and effective personal ear protection. Where employees are exposed to noise levels at 85dB(A) or above or the peak action level or above, all employees will be provided with and must wear the personal ear protection that has been provided.
- 16.7 The Company will establish where necessary, ear protection zones which will be indicated by the relevant sign in accordance with the Safety Signs Regulations. All employees must wear ear protection within the designated area.



16.8 Ear protection will be maintained by the Company and employees are required to report any damage or defect to the Hire and Operations Controller. For those employees required to wear such ear protection in areas at 85dB(A) or over, or the peak level or over, they will be provided with adequate information, training and instruction with regard to:

- a) The risk of hearing damage
- b) Steps to minimise the risk
- c) Where and when to wear ear protection and where the ear protection can be found
- d) The employee's duties under the Noise Regulations and the Personal Protective Equipment at Work Regulations.



UPA Ltd

Health, Safety and Environment Policy

Sub Section 17

NON STATUTORY INSPECTIONS

- 17.1 The Hire and Operations Controller is periodically responsible for the inspection of processes, equipment and materials, which are detailed in this policy. Some of these inspections are not required by law but are part of the Company's commitment in maintaining the highest standard of health and safety.
- 17.2 The premises will be inspected at regular intervals.
- 17.3 The Safety, Health & Environment Manager will regularly inspect first aid kits. Any items within the kit that has been used will be recorded in order for the kit to be re-stocked.
- 17.4 All staff will be responsible for examining any equipment or machinery before they use it.
- 17.5 Services and electricity will be inspected at least annually.
- 17.6 The accident report book will be inspected when appropriate.
- 17.7 Lighting, heating, ventilation and welfare facilities will be inspected regularly to ensure their continued adequacy.



Sub Section 18

OFFICE SAFETY

- 18.1 There are a number of risks associated with working in an office and although generally of low risk, the following points should be remembered:
- keep floors and aisles clear at all times
 - keep floors clear of materials or substances likely to cause persons to slip, trip or fall
 - do not lift anything too heavy or awkward which is likely to cause injury
 - do not overfill filing cabinets and do not store materials on top of ledges, filing cabinets, etc.
 - do not interfere with any electrical materials and report any electrical faults or defects
 - follow any guidance or instructions on notices or signs
 - keep fire exits clear at all times
- 18.2 There are potentially particular risks associated with the use of visual display units (VDUs) which can be avoided.
- 18.3 Office staff must be aware of the risks associated including the arrangements for dealing with emergencies.
- 18.4 Employees are required to keep their own work areas clean and tidy at all times. Employees must only smoke in the designated smoking area. Employees are advised not to drink and eat in the vicinity of electrical equipment which may cause risk of shock or equipment damage.
- 18.5 Employees must not use anything other than step ladders or other specifically designed aids to reach high shelves or other areas out of reach from the ground, eg. files on shelves.
- 18.6 Any hazardous materials or substances used in the office must be treated as any other dealing with the control of substances hazardous to health. Assessments will be carried out and made available as appropriate.



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Health, Safety and Environment Policy

Sub Section 19

PERMIT TO WORK SYSTEMS (PTW)

- 19.1 Authorisation in the form of a Permit to Work must be obtained from the Hire and Operations Controller before any hot work can take place:
- 19.2 In all cases the permit to work system will have in place the following features
- The person responsible for issuing the permit
 - The person responsible for accepting the permit, who may be either a UPA Ltd employee or contractor
 - The period of time the permit is valid for
 - A copy of the permit to be retained
 - The responsibilities of those involved in the permit
- 19.3 PTW systems will be reviewed at least annually to assess their effectiveness.
- 19.4 All employees involved in a PTW system must receive adequate documented training in the PTW and be deemed competent.
- 19.5 Until a permit is cancelled it supersedes all other instructions.
- 19.6 There must be communication and liaison between those involved in the PTW and others who may be affected by it.
- 19.7 Once the work is completed, the PTW handback procedure should be carried out involving both the Client and the UPA Ltd employee or contractor.
- 19.8 Employees uncertain as to what is required regarding any PTW should ask the Hire and Operations Controller.

Only competent and designated employees will be permitted to undertake a process involving a PTW and on no account must further work be carried out using the same PTW

**Sub Section 20****PERSONAL PROTECTIVE CLOTHING AND EQUIPMENT**

- 20.1 The Company will ensure that employees are provided with adequate and effective personal protective equipment (PPE) and clothing that has been highlighted via the risk assessment procedure. Such provision will be made following these assessments. The Company recognises that PPE will be provided as a last resort, as a final means of reducing and preventing risk. The Company aims to fully meet the requirements of the Health & Safety (Personal Protective Equipment) Regulations (PPE Regs).
- 20.2 PPE is provided free of charge on the basis that PPE is not used outside the premises. All damaged, worn or defective PPE will be replaced by the Company as soon as it is reported.
- 20.3 PPE will be provided in accordance with British Standards and European Standards and carry the EC Mark for PPE.
- 20.4 Head protection should generally be worn where there is a risk of a head injury due to falling objects or in confined spaces where there is a risk of hitting the head.
- 20.5 Eye protection will be provided in accordance with the PPE Regs 1992 and in any situation where there is a risk of eye injury, particularly when using machinery where particles can fly off from them or in areas where hazardous substances are to be used.
- 20.6 The Company will ensure that those employees who require eye protection will receive the correct PPE having considered the task, the risks involved and the training given in the task and the use of PPE.
- 20.7 Protective outdoor clothing will be provided for those staff who need to work outdoors in inclement weather.
- 20.8 Protective gloves will be provided to a variety of employees for various tasks. The particular type will be decided by the risk assessment through experience and by employee request if justifiable.



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Sub Section 21

PREMISES

- 21.1 All premises will be maintained in a condition which, so far as is reasonably practicable, is safe and without risks to health.
- 21.2 All employees have a responsibility to maintain the premises and not to do anything to damage the facility in any way. Employees must report any defects or damage to the Hire and Operations Controller without delay.
- 21.3 The Safety, Health & Environment Manager will inspect the premises at regular intervals.
- 21.4 Following is a list of general rules for employees to follow (most are included in various parts of this policy)
 - Do not cause obstructions
 - Do not attempt to interfere with or repair any equipment or machinery unless allowed to and competent to do so
 - Report all defects, damage or dangerous condition or unsafe system of work
 - Dispose of rubbish in specified bins and skips
 - Use proper step ladders to gain access to heights
 - Do not move any load liable to cause injury without assistance
 - Do not obstruct fire exits
 - Observe all signs
 - On leaving work, ensure it is left in a tidy and clean state and store away necessary materials
 - Follow proper procedures, instruction and training at all times
- 21.5 Heating, lighting and ventilation is provided and maintained by the Company, together with safe layout of the premises to ensure that good housekeeping can be maintained at all times.
- 21.6 A variety of notices will be displayed around the premises, which are for the benefit of all employees to protect their health and safety. Such notices will be positioned in conspicuous places and employees must have due regard to the notices. Employees must not interfere with, remove or deface any signs or notices.
- 21.7 In accordance with the Workplace (Health, Safety and Welfare) Regulations, the Company will maintain adequate welfare facilities, toilets, drinking water, washing and drying facilities.



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Sub Section 22

PURCHASING POLICY

- 22.1 It is the policy of UPA Ltd not to buy any article or service which will not meet the health and safety standards set by official bodies, including the European Community (EC) and British Standards (BS).
- 22.2 In purchasing any articles or services, regard shall be given to health and safety and relevant quality standards.

Purchasing Procedure

- 22.3 Any tender for contracts will include adequate clauses on health and safety and require sight of the contractors risk assessments and Company safety policy.
- 22.4 Where practicable, no piece of machinery shall be purchased unless it meets the requirements of the Supply of Machinery (Safety) Regulations (CE marked). If this is not practicable, then due regard will be given to the relevant Regulations and CE approval will be sought prior to placing the equipment into use.
- 22.5 In the purchase of any equipment or article, adequate health and safety information must be provided or, if not, requested by the Company.
- 22.6 In the purchase of any equipment or article, consultation will take place with the Hire and Operations Controller with respect to health and safety.
- 22.7 Any hazardous substance purchased from a supplier will be required to include the data sheet specifying the ingredients, etc, of the substance, in order to assist the company in producing a relevant COSHH Assessment.
- 22.8 In the purchasing of any articles or substances, the Company will endeavour to purchase items that present the least risk in terms of health and safety and environmental protection. Alternatives to or substitution of more hazardous articles or substances to less hazardous items will be adopted at all times.
- 22.9 In purchasing articles, etc, regard shall be given to the on-going health and safety aspects such as examination, testing, inspection and maintenance.



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Sub Section 23

COMMUNICATION & REVIEW OF POLICY

- 23.1 This policy and any other guidance, information, instruction, training, etc, which accompanies needs to be fully understood by all employees (and others) as appropriate.
- 23.2 Copies of this policy will be kept as specified within the UPA Ltd distribution list.
- 23.3 The contents and detail of the health & safety policy will be covered on the induction of all new employees and contractors.
- 23.4 Particular employees will be trained in elements of the policy where appropriate and will be required to demonstrate their understanding of the procedures from time to time.
- 23.5 Important arrangement sections of the policy will be displayed in conspicuous places.
- 23.6 All employees who can contribute to the policy and any improvements should do so through the Directors.
- 23.7 The policy is a working document and will change constantly as employees, materials, equipment and processes change. The policy will however be formally reviewed annually by the Safety, Health & Environment Manager for approval and signature.
- 23.8 All employees will be made aware of any changes of significance, which have been made as a result of the review process.
- 23.9 Consideration in any review will be given to recommendations received from the HSE, Fire Authority and other recognised agencies.



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Sub Section 24

SAFETY COMMITTEES

- 24.1 UPA Ltd has a health & safety committee which meets every 6 months. The Safety, Health & Environment Manager shall set the dates of the meetings. In addition, a copy of the most recent minutes will be distributed for all employees to review.
- 24.2 The Safety, Health & Environment Manager shall issue an agenda to the members before each meeting and this will be strictly adhered to. A copy of the minutes of the previous meeting will also be issued prior to the meeting for representatives to review and comment on as appropriate.
- 24.3 The function of the safety committee should be concerned with the management of health, safety and welfare. The agenda should include, for example:
- Review of previous minutes
 - Review of the accident and incident book entries made over the period, noting any accident, incident, injury or disease trends, and making recommendations to avoid a recurrence
 - Any health & safety audits, survey reports and inspections
 - Health and safety points brought to the meeting by the members
 - Review of accident statistics
 - Development of new health & safety initiatives



Sub Section 25

STATUTORY INSPECTIONS

- 25.1 There are a number of statutory inspections, which need to be carried out due to specific legislation. Other inspections may be carried out but are not required by law.
- 25.2 It is the responsibility of the Safety, Health & Environment Manager and Hire and Operations Controller to ensure that all statutory inspections are carried out by competent persons within the time-scale and a record kept of the result of the inspection.
- 25.3 The Hire and Operations Controller will keep record of the statutory inspections.
- 25.4 Any inspection which does not result in a pass of the equipment to the required standard will be put out of commission until such time that the necessary works have been completed and the re-inspection and pass have taken place.
- 25.5 Further information and guidance on statutory inspections are available from the Safety, Health & Environment Manager.



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Sub Section 26

TRAINING

- 26.1 The Company recognises the importance and value of health and safety training and is committed to providing adequate information, instruction and training. Training will be given in accordance with the requirements under Health and Safety at Work, etc, Act 1974 and Management of Health and Safety at Work Regulations.
- 26.2 The Company will ensure that all new employees / contractors receive induction training upon starting with UPA Ltd. The induction training will cover at least the following:
- a) Health and Safety Policy
 - b) Accident and Incident reporting procedures
 - c) Fire and Emergency arrangements
 - d) First Aid arrangements
 - e) Electrical safety
 - f) Manual Handling
 - g) Working at Height
 - h) Plant and Machinery
 - i) The Company's Risk Assessment policy
 - j) Protective and preventative measures devised as a result of the risk assessment
 - k) Use of Personal Protective Equipment and clothing
 - l) Employee responsibilities
- New employees / contractors will be shown around the site and the various important aspects pointed out such as the fire arrangements, means of escape, fire points, etc.
- 26.3 In addition to the above, specific information will be provided relevant to an employee's particular tasks or job.
- 26.4 The Company will make available this health & safety policy and the Director must ensure that any health and safety files are kept up to date and available to employees at all reasonable times.
- 26.5 All staff training will be recorded and this includes any on-going training in addition to the induction training indicated above.



UPA Ltd

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- 26.6 The Company will endeavour to ensure that employees are capable in terms of health and safety for the task they are required to do. To do this the company will continue to assess the health and safety training needs of employees. At the same time any employee who wants further information, instruction or training should request such from the Hire and Operations Controller.
- 26.7 Employees must not attempt any task they are not competent to perform because of inadequate health and safety training. The Hire and Operations Controller, in requesting tasks of employees, should first satisfy themselves that the employee is adequately trained and hence competent.
- 26.8 As part of this training policy, and to encourage and reaffirm training, signs and notices will be displayed in conspicuous places to remind staff of the proper arrangements. Employees must have regard to such notices and must not remove or deface notices.
- 26.9 The Company will ensure that management receive adequate training, instruction and information to ensure that they can adequately manage their health and safety responsibility and look after the employees under their control.



Sub Section 27

VISUAL DISPLAY UNITS (DSE)

- 27.1 The Company will comply with the Health & Safety (Display Screen Equipment) Regulations and follow guidance produced by the HSE.
- 27.2 There are a number of potential problems from using VDUs, but these are preventable if equipment is used correctly. The Safety, Health & Environment Manager will assess each work station in association with the user, taking into account:
- The display screen equipment
 - The desk and work surfaces
 - Chair
 - Environment
 - Type of work
 - User
 - The screen graphics
- 27.3 The results of the assessment will be recorded on the appropriate form. The necessary measures required to remedy any risks identified will be made.
- 27.4 All employees who are classed as users will receive training in the health and safety aspects of using their work stations and the best postural positions to adopt.
- 27.5 Where a problem arises in the use of display screen equipment, eg. eye strain, upper limb pains, headaches, etc, employees must inform their supervisor. The Company will:
- Take all necessary steps to investigate the circumstances
 - Take corrective measures where appropriate
 - Advise the employee of the action taken
- 27.6 The Company will consider changes of task if practicable to do so within the working day to prevent intensive periods of on-screen activity.

**Sub Section 28****CONTRACTORS****Signing In Procedures**

- 28.1 All UPA Ltd contractors must sign onto the premises of all Client sites if required.
- 28.2 Contractors are required to read the Code of Practice for contractors and sign to confirm that they understand and will comply with the information.
- 28.3 Contractors will be required to wear any personal protective equipment deemed necessary. All contractors will be given general information regarding the health and safety of the Clients premises.
- 28.4 Depending on the circumstances, contractors will be shown elements of this safety policy and given additional information, instruction and training as deemed necessary.

Pre-Contract Screening

- 28.5 Contractors shall wherever possible, complete and return a Contractor's Questionnaire to ensure that they are aware of their obligations under health and safety legislation. Contractors who complete the questionnaire satisfactorily will become approved contractors.
- 28.6 Contractors not yet approved shall be sent a copy of the questionnaire, together with the Code of Practice for contractors before or when they are asked for quotations, etc.
- 28.7 A written contract may be required for certain tasks involving contractors. Where this is the case, the person issuing the contract will be responsible for ensuring it contains adequate health and safety clauses.

On Site Responsibility

- 28.8 It is the responsibility of the Hire Desk Controller and Hire and Operations Controller, who is responsible for the contractors on site to ensure that nobody is placed at risk by the activities of the contractors. Equally, UPA Ltd has a responsibility to the contractor and will ensure that they are never put at risk by acts or omissions of the Company or its staff.
- 28.9 In certain cases a Permit to Work system will be issued.



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Sub Section 29

LONEWORKING

- 29.1 There are a number of hazards associated with loneworking, employees should be made aware of these hazards by the completion of a Risk Assessment so as to reduce the risks to the lowest level so far as is reasonably practicable.
- 29.2 Particular attention needs to be given to those employees who travel to and from sites of Clients and potential Clients.
- 29.3 All planned visits "where possible" are logged in the Company diary of the location of the visit and the envisaged time of return.
- 29.4 All rules and procedures must be followed that are issued by the host.
- 29.5 No employee must visit any unoccupied site or location without someone accompanying them.
- 29.6 Where appropriate, upon arrival all staff should report to the gatehouse or reception of the host, so as to make others aware of their presence on site.
- 29.7 No employee / contractor can work alone within the Company without prior consultation and then authorisation.



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Sub Section 30

LIFTING EQUIPMENT AND ACCESSORIES

- 30.1 The Company aim is to provide lifting equipment and accessories for employees to use at work, which is so far as is reasonably practicable, safe and without risks to health.
- 30.2 The Company will endeavour to ensure that the right lifting equipment is purchased.
- 30.3 The Company will maintain all lifting equipment in efficient working order. All equipment will have a routine and planned maintenance programme. A record of lifting equipment, which requires legal testing or maintenance will be held and kept up to date by the Hire and Operations Controller.
- 30.4 Safe systems of work for maintenance of lifting equipment may include the isolation from sources of energy, prior to the work being carried out.
- 30.5 All general principles will be applied in line with the requirements of LOLER.
- 30.6 Prior to use, lifting equipment will be checked with relevant information, instruction and training given to employees who will use the lifting equipment. Such training will include the risks and the preventative and protective measures, safe systems of work and any personal protective equipment or clothing that is required to be worn.
- 30.7 Employees must not use any lifting equipment unless they are capable of doing so and have received the necessary information, instruction, training and authorisation.
- 30.8 Employees must report any damage, malfunction or unsafe lifting equipment to the Hire and Operations Controller and Safety, Health & Environment Manager immediately.
- 30.9 Employees must never interfere with or attempt to repair any lifting equipment unless authorised and competent to do so.



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Sub Section 31

DOMESTIC HIRE

- 1 The aim of United Powered Access (UPA) is to provide the UK with Mobile Elevated Work Platforms, which are safe and without risks to the health and safety of its customer base in line with the requirements of the Lifting Operations and Lifting Equipment Regulations (LOLER).
- 2 UPA will maintain all Mobile Elevated Work Platforms in efficient working order and all Mobile Elevated Work Platforms will have a routine and planned maintenance programme.

PROCEDURE

- 1 The Hire and Operations Controller receive a request for a MEWP from a potential domestic customer
- 2 The Hire and Operations Controller requests relevant information from the customer and logs the call on to the system
- 3 The Hire and Operations Controller arranges for a survey of the premises / location to be carried out by either himself or another UPA Representative, during this survey the following will be taken into consideration:
 - ✓ Specific type of MEWP to be used
 - ✓ Specific tasks to be undertaken
 - ✓ Ground conditions
 - ✓ Overhead hazards
 - ✓ Storage and security
 - ✓ Delivery and collection of MEWP
- 4 Upon successful completion of the survey the customer will then be invited to the UPA yard for completion of the Hire Agreement and specific familiarisation on the type of MEWP to be used.
- 5 The competent UPA Representative will instruct the customer of the following during the familiarisation, upon successful completion a hand-over instruction certificate will be issued:

Instructions

- 1 **How Platform Controls Operate** - The UPA Representative will show the customer how to operate the platform controls by moving forward, reversing, raising and lowering the platform or basket, in addition the customer will also be shown the emergency stop function and the horn.



- 2 **How Base Controls Operate** - The UPA Representative will show the customer how to operate the base controls by raising and lowering the platform or basket.
- 3 **How Emergency Controls Operate** - The UPA Representative will show the customer where the emergency controls are located and how to operate the emergency controls by raising and lowering the platform or basket.
- 4 **Location of Operators Manual** - The UPA Representative will show the customer where the operator's manual is located on the MEWP as this must be used for reference and additional information when required.
- 5 **Daily Charging / Fuelling Procedure** - The UPA Representative will show the customer how to charge the MEWP and where required the refuelling location of the fuel tank to be filled with DIESEL.
- 6 **Additional Advice** - The UPA Representative will advise the customer that IPAF (www.ipaf.org) operate a training course on the safe use and operation of a MEWP which covers the full spectrum of MEWP training and access platforms.

Customer Obligations

- 1 **Machines Must Operate on a Flat and Solid Surface as per the Operators Manual** - The UPA Representative will advise the customer that the machine must only be used on a flat and solid surface and that additional information can be found within the Operators Manual that has previously been covered as part of this familiarisation instruction.
- 2 **Machines Must Never Operate in the Vicinity of Overhead Cables as per the Operators Manual** - The UPA Representative will advise the customer not to operate any MEWP where overhead cables are present and that additional information can be found within the Operators Manual that has previously been covered as part of this familiarisation instruction.
- 3 **Machines Must Not Be Operated When Stated Wind Speed on Machine Safety Stickers / Operators Manual is exceeded** - The UPA Representative will advise the customer not to operate any MEWP when stated wind speeds on safety stickers positioned on the MEWP and also contained within the Operators Manual have been exceeded and that additional information can be found within the Operators Manual that has previously been covered as part of this familiarisation instruction.
- 4 **Machines Must Be Stored in a Safe and Secure Location** - The UPA Representative will advise the customer that the MEWP must be stored safe and secure to prevent damage or theft.



Acceptance

- 1 The UPA Representative will confirm that the above has been understood and that the customer accepts the terms and conditions of the Construction Plant Hire Association Modern Terms for the hiring of plant and agrees to be bound by these. A copy of the CPA Terms and Conditions is available upon request.
- 2 The UPA Representative will advise the customer that all faults inclusive of damage and malfunctions must immediately be reported to the UPA Operational Director or in his absence the Safety, Health and Environment Manager.
- 3 The customer will then formally accept the customer obligations and the instructions that have been given by signing the acceptance part of the hand-over instruction certificate.
- 4 The specific MEWP will then be delivered to the customer's premises at an agreed time, where the UPA Representative will confirm that the above has again been understood and that the customer accepts the terms and conditions of the Construction Plant Hire Association Modern Terms for the hiring of plant and agrees to be bound by these by signing the hand-over acknowledgement certificate.
- 5 A copy of the CPA Terms and Conditions is available upon request.



Sub Section 32

MANAGEMENT AND CONTROL OF WASTE

- 32.1 There are a number of Environmental issues associated with the disposal of all waste materials, all employees must be made aware of these issues before any disposal can take place.
- 32.2 It is necessary to control all waste from the work operations, record it and ensure its correct transfer and disposal in accordance with all relevant Acts and subsequent supporting Regulations and Codes of Best Practice.
- 32.3 The Hire and Operations Controller is appointed the waste controller for UPA Ltd, who will be responsible for controlling and monitoring the waste produced, organising skips and other receptacles, ensuring the correct waste transfer notes for carriage are issued and that all records are kept and filed.
- 32.4 All waste produced will be disposed of in accordance with all relevant Acts and subsequent supporting Regulations and Codes of Best Practice. This may involve segregating waste into different categories. Different waste materials may require different waste carriers.
- 32.5 It is not permitted to bury or burn any waste materials at any time.
- 32.6 All skips must be of sound condition and covered during the storage, transport and disposal of waste materials.
- 32.7 It will be necessary to obtain written confirmation from the Client that no contamination exists on the plant to be cleaned which may be disturbed or released by normal cleaning operations and which may produce harmful pollutants, unless such materials are clearly identified under the contract specification. All such contamination should be clearly identified and dealt with accordingly. It is important however, to check that no clause is in existence in the contract which may have the effect of negating the above, imposing additional conditions on UPA Ltd.



UPA Ltd

Health, Safety and Environment Policy

Sub Section 33

WORKPLACE, HEALTH, SAFETY AND WELFARE

The Company will ensure that employees are provided with adequate welfare facilities and will comply with the Workplace, Health, Safety and Welfare Regulations and follow guidance produced by the HSE.

Maintenance

Work equipment, devices and systems will be maintained in an efficient state and working order, and in good repair. Where appropriate, they will be subject to a suitable system of maintenance.

Ventilation

Enclosed workplaces will be ventilated by a sufficient quantity of fresh purified air.

Temperature

A reasonable temperature will be maintained inside buildings during working hours and a sufficient number of thermometers will be provided.

Lighting

Lighting will be suitable and sufficient and where possible natural, so far as is reasonably practicable. Emergency lighting is provided where lighting failure would cause danger.

Cleanliness

Workplaces and furnishings will be kept sufficiently clean.

Space

Workrooms will have sufficient floor areas, height and unoccupied space, so far as is reasonably practicable.

Floors

Floors will be suitable and not be uneven or slippery, so presenting a safety risk and kept free from obstructions likely to cause a slip, trip or fall, so far as is reasonably practicable. Handrails will be provided on staircases, except where they could obstruct traffic.

Falls

Suitable and sufficient measures should be taken, so far as is reasonably practicable, to prevent persons falling or being struck by falling objects.



Windows

Windows and transparent / translucent surfaces, will consist of safe material be clearly marked and safe when open.

Traffic

Workplaces will be arranged, so far as is reasonably practicable to allow safe circulation by pedestrians and vehicles.

Doors

Doors and gates will be suitably constructed and will comply with all relevant specifications.

Sanitation

Suitable and sufficient sanitary conveniences will be provided at readily accessible places

Washing

Suitable and sufficient washing facilities will be provided at readily accessible places.

Water

An adequate supply of wholesome drinking water and cups will be provided, readily accessible and conspicuously marked.

Clothing

Suitable and sufficient accommodation for clothing will be provided, as well as changing facilities where special clothing is required to be worn.

Rest

Suitable and sufficient rest facilities will be provided at readily accessible places.



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Health, Safety and Environment Policy

Sub Section 34

SMOKING

- 34.1 The purpose of the smoking policy is to protect employees from passive smoking and to protect the building from potential fire hazards and risks.
- 34.2 A total no smoking ban is applicable within all internal rooms.
- 34.3 Smoking is only permitted within the designated smoking area.
- 34.4 All discarded cigarettes must be put into the containers provided and the designated smoking area must be kept clean and tidy at all times and checked prior to going home.



Sub Section 35

VISITORS

- 35.1 Depending on the circumstances, visitors will be shown elements of the Health and Safety policy and procedures, and given additional information, instruction and training as deemed necessary.
- 35.2 All visitors must sign into the premises in the register kept for visitors.
- 35.3 The log will record the date, time and name of the visitor and the person they are visiting or reporting to.
- 35.4 Visitors will be required to wear any personal protective equipment deemed necessary by the Company.
- 35.5 It is the responsibility of the UPA Ltd contact(s), for the visitor whilst on the premises.



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Sub Section 36

STRESS

- 36.1 The Company acknowledges that all people encounter stress in their personal lives and are committed to managing work-related stressors as any other health and safety risk. Through the risk assessment process, the Company will continue to identify hazards and assess all mental and physical risks to health and safety with the objective of reducing them, so far as is reasonably practicable.

**Sub Section 37****HAND ARM VIBRATION**

- 37.1 Hand Arm Vibration Syndrome (HAVS) is a widespread hazard for employees in many industries and occupations. HAVS exposure at work can arise from the use of hand-held power tools (grinders, hammer drills, etc), hand-guided machinery (floor scrubbers, sweeping machines, plate compactors, etc) and hand-fed machines (pedestal grinders, pedestal drills, etc).
- 37.2 Prolonged and regular exposure to this vibration can affect the operator's health. The risks from vibration can be controlled and employees can be protected from ill health caused by vibration.
- 37.3 To control risks and to protect employees, UPA Ltd will comply with the requirements of the Control of Vibration at Work Regulations 2005 and guidance produced by the HSE.
- 37.4 Where possible alternative ways of working, which eliminate vibrating equipment will be looked at.
- 37.5 All hand-held tools and machinery that vibrate should be measured for the vibrating factor and recorded.
- 37.6 All employees who operate hand-held tools and machinery that vibrate should be monitored annually for the amount of usage (trigger time) over a specified period and recorded.
- 37.7 When purchasing new equipment the vibration levels of equipment must be considered to ensure that the lowest level possible are purchased.



UPA Ltd

Health, Safety and Environment Policy

Sub Section 38

WORK SAFE

UPA Ltd acknowledges and upholds the right of employees, or contractors to refuse to work on the grounds of health and safety. The criteria used to measure this refusal is 'If it is not safe, don't do it'.

Every person has a duty of care to themselves and those who may be affected by their actions and omissions. Employees and contractors are encouraged to contribute to their own and others safety proactively. The Hire and Operations Controller are required to lead by example.

Any employee or contractor who refuses to work on the grounds of health and safety must report the circumstances immediately to the Hire and Operations Controller. The employee or contractor concerned must be able to justify their decision to discontinue work on the grounds of health and safety. Any person evoking the procedure will not be subject to disciplinary action by the Company, unless it is mischievous or for personal gain.

RESPONSIBILITIES

UPA Ltd Directors are responsible for ensuring adequate and sufficient resources are allocated in respect of health, safety and environment.

The Hire and Operations Controller are responsible for allocating suitable and competent resources to each work activity and for ensuring those persons allocated to a work activity undertake that work in accordance with the planned safe system of work and have sufficient and appropriate tools, equipment, and machinery to do the work safely.

The Hire and Operations Controller are responsible for ensuring suitable and sufficient risk assessments, method statements and where appropriate permit to work systems are completed for each work activity. Hire and Operations Controller are responsible for ensuring these are briefed to all relevant persons who are affected by the work.

These briefings are recorded and identify the potential hazards, precautions to be implemented and any residual hazards are brought to the attention of those affected by the work activity.

Where an individual evokes this procedure, the Hire and Operations Controller will be informed immediately. The Hire and Operations Controller will review the safe system of work; where appropriate he / she may take advice from other competent persons.

It is the responsibility of the Hire and Operations Controller to authorise whether or not the work should be aborted or continue either as planned or with additional safety precautions being implemented.



PROCEDURE

Any employee or contractor who believes that there is a potential risk to their or to others health and safety can implement the work safe procedure.

They must immediately inform their concerns to the Hire and Operations Controller, who will stop the work and review the safe system of work. The review will take account of the following but is not limited to: -

- ✓ Re-iterating the work risk assessment and safe system of work in greater detail.
- ✓ Specifying the precise instruction or standard applicable to the situation.
- ✓ Removing the hazard or enhancing the system of work in order to reduce the risk to an acceptable level prior to proceeding with the task.
- ✓ Postponing the work until a new safe system of work is agreed.

Once the Hire and Operations Controller have completed the review, he / she must document their findings and brief the person(s) on the findings of their review. Where the person(s) are satisfied with the findings of the review and all additional precautions implemented then work will commence after a full briefing has taken place.

Where the safe system of work is not to be changed and / or additional precautions implemented then all personnel involved in the work activity will be briefed before work re-commences.

If after the briefing those persons invoking the procedure are not satisfied with the arrangements for their safety then, they must not continue to work until everyone is satisfied and additional precautions implemented.

In all cases where there has been a refusal to work on the grounds of health and safety the Manager / Supervisor shall investigate and write a report into the circumstances for the refusal to work. The investigation shall include, but will not be limited to: -

- ✓ The reasons for the refusal to work.
- ✓ Witness testimony from those invoking the procedure.
- ✓ The reviews undertaken by the Manager / Supervisor.
- ✓ Any other appropriate professional advice.

MONITOR AND REVIEW

The contents of all reports are discussed at Management meetings in order to determine whether any changes to the UPA Ltd Safety Management System are required.

UPA Ltd

Health, Safety and Environment Policy



Sub Section 39

INDEX OF LEGISLATION

Legislation that may apply within UPA Ltd

THE HEALTH AND SAFETY AT WORK etc ACT
THE CONSTRUCTION, DESIGN AND MANAGEMENT REGULATIONS
THE MANAGEMENT OF HEALTH AND SAFETY AT WORK REGULATIONS
THE WORKPLACE (HEALTH, SAFETY AND WELFARE) REGULATIONS
THE PROVISION AND USE OF WORK EQUIPMENT REGULATIONS
THE LIFTING OPERATIONS AND LIFTING EQUIPMENT REGULATIONS
THE MANUAL HANDLING OPERATIONS REGULATIONS
THE HEALTH AND SAFETY (DISPLAY SCREEN EQUIPMENT) REGULATIONS
THE PERSONAL PROTECTIVE EQUIPMENT AT WORK REGULATIONS
THE REGULATORY REFORM (FIRE SAFETY) ORDER
THE WORK AT HEIGHT REGULATIONS
THE CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH REGULATIONS
THE ELECTRICITY AT WORK REGULATIONS
THE NOISE AT WORK REGULATIONS
THE DANGEROUS SUBSTANCES AND EXPLOSIVES ATMOSPHERE REGULATIONS
THE HEALTH AND SAFETY (FIRST AID) REGULATIONS
THE CONTROL OF LEGIONELLA BACTERIA IN WATER SYSTEMS REGULATIONS
THE REPORTING OF INJURIES, DISEASES AND DANGEROUS OCCURENCES REGULATIONS
THE SAFETY REPRESENTATIVES AND SAFETY COMMITTEES REGULATIONS
THE HEALTH AND SAFETY (CONSULTATION WITH EMPLOYEES) REGULATIONS
THE HEALTH AND SAFETY (SAFETY SIGNS AND SIGNALS) REGULATIONS
THE HEALTH AND SAFETY INFORMATION FOR EMPLOYEES REGULATIONS
THE ASBESTOS AT WORK REGULATIONS
WORK IN COMPRESSED AIR REGULATIONS
THE EQUALITY ACT