

HEALTH AND SAFETY POLICY

This is the Vigilance health and safety policy. It forms part of the Company Handbook and related information is contained both in the Handbook and in the Company's wider ISO 9001 documents.

1. GENERAL STATEMENT OF HEALTH AND SAFETY POLICY

The general policy of Vigilance is, so far as is reasonably practicable:

- To provide adequate control of the health and safety risks arising from our work activities;
- To consult with our employees and subcontractors over matters affecting their health and safety;
- To provide and maintain safe plant and equipment;
- To ensure safe handling and use of substances;
- To provide information and instruction for employees and subcontractors, and supervision for employees;
- To ensure that all employees and subcontractors are competent to do their tasks, and to give them adequate training;
- To prevent accidents and cases of work-related ill health;
- To maintain safe and healthy working conditions; and;
- To ensure that persons not in our employment or engaged by us as subcontractors who may be affected by our work activities are not exposed to risks to their health or safety.

Signed:



Date: 18 March 2020

Name: Seb MacKenzie-Wilson

Position: CEO

2. DESCRIPTION OF WORK UNDERTAKEN

Vigilance specialises in protecting vacant residential and commercial properties for its owners or representatives via a contracted non-tenancy caretaker occupation and by security guarding. Caretaking personnel and security guards are individually vetted and self-employed, drawn from ex-military and professional circles, and predominantly SIA licensed. Domestically resident caretaker staff and security guards protect against the possibility of squatting, while helping to protect against wilful, accidental or general damage. The company may also assist clients in routine, unskilled tasks such as clearance, cleaning, maintenance etc.

3. ISO 45001

Vigilance recognises that its site activities give rise to a range of hazards, in particular slips, trips and falls arising from site-specific factors and confrontation with unauthorised people attempting to gain access to sites. It also recognises that its employees may be exposed to hazards when providing on-site support to their customers.

Vigilance believes that despite the presence of these hazards, all accidents and incidents of work related ill-health are preventable. It also recognises it has a legal responsibility to ensure the health, safety and welfare of persons affected by its activities.

As such, Vigilance is committed to:

- Preventing injury or ill health to anyone who may be affected by its work activities
- Complying with all relevant legal, customer and other third party requirements
- Continually improving its risk management and occupational health and safety performance.

Vigilance will achieve these commitments through the following means:

- The implementation and maintenance of an Occupational Health and Safety Management System that is independently certified as compliant with BS ISO 45001:2018
- The systematic identification of hazards present and the application of a risk assessment procedure that will identify and implement appropriate control measures and safe systems of work
- The maintenance of a set of objectives and a supporting programme of work that is focussed on achieving its commitments and eliminating or reducing the major hazards present
- The clear definition of individual management and employee responsibilities for implementing the Occupational Health and Safety System and achieving the Company's commitments
- The provision of appropriate information, instruction, training and supervision so that all employees:
 - are aware of their responsibilities and legal duties; and
 - can support the implementation of the Occupational Health and Safety System and the development of a proactive health and safety culture
- The maintenance of effective systems of communication and consultation on Health and Safety issues with our employees and other persons affected by the Company's activities.

The appropriateness and effectiveness of this policy and the means identified within it for delivering the Company's commitments will be regularly reviewed by the Top Management.

The implementation of this health and safety policy is fundamental to the success of Vigilance's business and must be supported by all employees as an integral part of their daily work.

This policy is publicly available to interested external parties upon request.

4. ORGANISATION

COMPANY RESPONSIBILITIES

Overall policy is the collective responsibility of the Executive Board of the company. Ensuring day-to-day implementation of the policy lies with the Chief Executive Officer who will:

- a) Ensure suitable financial provision is made for health and safety obligations.
- b) Provide appropriate information and instruction to employees.
- c) Ensure work is planned to take into account health and safety issues.

Named officer responsible for the health and safety policy: Seb MacKenzie-Wilson, Chief Executive Officer

Overall responsibility: Chief Executive Officer.

Day-to-day responsibility for management of health and safety: Operations Coordinator.

Day-to-day responsibility for implementation of safe working practices: Employees, subcontractors and appointees.

Each departmental manager will have the following responsibilities:

- a) Implementation of this policy in his or her own department and bringing it to the attention of all employees.
- b) Compliance with safety precautions that apply to his or her department, including the regulating of contractors.
- c) Ensuring that all new entrants are properly inducted, which must include an awareness of all precautions and procedures applicable to the job.
- d) Ensuring that no person is permitted to work at any kind of machinery or hazardous task unless he or she has been properly and fully instructed.
- e) Ensuring that all staff are aware of the location of all fire-fighting equipment and alarm call points and are conversant with their use.
- f) Ensuring that any legal requirements relating to operations are fully complied with, including (but not limited to):
 - Inspection of all fire-fighting equipment;
 - Safe use of electrical switches and circuits;
 - Maintenance of all appropriate registers;
 - Necessary safety training for staff;
 - Statutory inspections of plant and equipment;
 - Provision of first aid equipment;
 - Accident investigation;
 - Arrangements for cleaning;
- g) Ensuring that any responsibilities delegated to subordinate staff are clearly identified;
- h) Ensuring that access to the premises by the customers or other members of the general public is strictly limited to safe areas;
- i) Ensuring that suitable arrangements are in place to safeguard the premises against intruders.

EMPLOYEES' RESPONSIBILITIES

All employees, subcontractors and appointees of the Company have to:

- Co-operate with the Directors, managers, other employees, subcontractors and appointees over health and safety matters.
- Not misuse anything provided to safeguard their health and safety.
- Take reasonable care of their own health and safety.
- Report all health and safety concerns in the first instance to the Operations Manager.

In emergency employees contact Police, Fire and Rescue Service or Ambulance as appropriate using the UK emergency number '999'.

Any accidents, dangerous occurrences, significant hazards and/or employees suffering from or in contact with an infectious disease must be notified immediately to a manager. In addition:

- a) Each employee is responsible for his or her own acts or omissions and the effect that these may have upon the safety of themselves or any other person.
- b) Every employee must use safety equipment or clothing in a proper manner and for the purpose intended.
- c) Any employee who intentionally or recklessly misuses anything supplied in the interests of health and safety will be subject to disciplinary procedures.
- d) Every employee must work in accordance with any health and safety instruction or training that has been given.
- e) No employee may undertake any task for which they have not been authorised and for which they are not adequately trained.
- f) Every employee is required to bring to the attention of a responsible person any perceived shortcoming in safety arrangements.
- g) All employees are under a duty to familiarise themselves with this policy.

5. ARRANGEMENTS, RULES AND PROCEDURES

RISKS ARISING FROM OUR WORK ACTIVITIES

- Risk assessments will be undertaken by the Operations Manager and by nominated personnel under the Operations Manager's instruction.
- Assessments will take account of work activities, work equipment, working environments and the people affected by the activities.
- Assessment findings will be reported to site personnel and to the Operations Coordinator.
- Action required to remove or control risks will be approved by the Operations Coordinator.
- Site personnel will be responsible for ensuring that the agreed action requirements are implemented.
- The Operations Manager will check that implemented actions have removed or reduced the risks.

- Assessments will be reviewed every twelve months, after any significant incidents or when the work activity changes, whichever is sooner.

HAZARDOUS SUBSTANCES

- The Operations Manager will be responsible for identifying all substances that need a COSHH assessment and for undertaking assessments.
- Before any hazardous substances are used during a work process, a safety data sheet (SDS) will be requested from the supplier and an appropriate assessment made of the risks from that substance will be undertaken by the Operations Manager, in line with the Control of Substances Hazardous to Health (COSHH) Regulations. Alternative, less harmful substances will be used where reasonably practicable.
- Assessments will consider storage, handling, aspects of use, exposure, PPE requirements, workers' health, and emergency actions. Supervisors will brief staff on any hazard or substance precautions, with written records being located in an accessible location where it is available to users.
- Site personnel are responsible for ensuring that all actions identified in the assessments are implemented.
- The Operations Manager will be responsible for ensuring that information is given to relevant people.
- Assessments will be reviewed every 12 months or when the work activity changes, whichever is soonest.
- The owners or managers of premises will be asked to supply a copy of the asbestos management plan for the property concerned and any significant matters arising will be communicated to site personnel. In the absence of an asbestos management plan, site specific safety precautions will be implemented as necessary.
- An inventory of all substances and materials hazardous to health is held at the head office.

CONTROL OF SUBCONTRACTORS

Only approved subcontractors will be used by Vigilance.

- Anyone instructing subcontractors must ensure that the subcontractors are on the company's approved list.
- Anyone instructing subcontractors will ensure that significant hazards are identified and discussed with subcontractors before the work starts on site.
- Subcontractors that have not countersigned the Assignment Instructions signed statement must prepare risk assessments in respect of their work activities and, for higher risk work, may be required to prepare method statements and/or to use permits to work.
- The person instructing the subcontractor is responsible for monitoring the subcontractor's work.

COMPETENCY FOR TASKS AND TRAINING

- The Operations Manager will provide induction training for all new site personnel.
- The Operations Coordinator will provide induction training for all new head office personnel, including subcontractors, temporary employees, casual workers, agency workers and volunteers.
- Training requirements will be identified, arranged and monitored by the Operations Coordinator.
- Training records are kept in the company's head office.
- All employees are given training appropriate to their responsibilities in accordance with the Management of Health and Safety at Work Regulations. Training will be provided for the following situations:
 - Induction training for new employees (Health and safety awareness, company procedures etc)
 - The introduction or modification of new/existing machinery or technology
 - A change in employee position/work activity or responsibility.
- Training is also specifically provided for work with hazardous substances, use of PPE and SIA matters. Any training provided by the company will be formally recorded with a hard copy kept on file.

EMERGENCIES

- It is the Company's policy to take account of fire hazards in the workplace. All employees have a duty to conduct their operations in such a way as to minimize the risk of fire. This involves compliance with the Company's no smoking policy, keeping combustible materials separate from sources of ignition and avoiding unnecessary accumulation of combustible materials.
- Site Supervisors are responsible for keeping their operating areas safe from fire, ensuring that their staff are trained in proper fire prevention practices and emergency procedures.

ACTION TO BE TAKEN UPON DISCOVERING A FIRE

- Do not try to tackle the fire yourself (unless trained to do so).
- Activate the nearest fire alarm to raise the alarm.
- Leave the building by the nearest fire exit and proceed to the muster point.
- Do not re-enter the building for any purpose until the all clear has been given.

ACTION UPON HEARING THE FIRE ALARM

- Stop working and calmly leave the building by the nearest fire exit.
- Go directly to the muster point and await instructions.
- Do not leave the muster point until the all clear is given.
- Do not re-enter the building for any purpose until the all clear is given.

STAFF WELFARE

- Wherever possible arrangements will be made with the Client for the use of welfare facilities at sites under their management. As a minimum the following requirements will be adhered to:
 - Toilet/washing facilities accessible on site.
 - Eating/rest facilities accessible on site.
 - Where these facilities are not provided by the Client, the company will provide suitable welfare facilities.

SAFE VEHICLES, PLANT AND EQUIPMENT

- The Operations Manager will be responsible for identifying all vehicles, plant and equipment needing maintenance.
- The Operations Manager will be responsible for ensuring that effective maintenance procedures are drawn up and implemented.
- Any problems found with vehicles, plant and equipment should be reported to The Operations Manager in the first instance who will then report to the Operations Coordinator for further instructions as necessary.
- The Operations Coordinator will check that new vehicles, plant and equipment meet health and safety standards before they are purchased.
- The Operations Manager will identify any plant and equipment on sites where the company is working which require training for use; or where statutory testing is required; and will confirm that the necessary training and inspections are in place before company personnel are authorised to use the plant and equipment concerned.
- No person may use any vehicles, plant or equipment unless they have received appropriate training or instruction and they are authorised to use the items concerned. All plant and machinery used by company personnel will be properly guarded and safe to use.

INFORMATION, INSTRUCTION AND SUPERVISION

- Instruction for site personnel will be arranged and monitored by the Operations Manager.
- Instruction for head office personnel (including young workers and trainees) will be arranged and monitored by the line manager concerned.
- The Health and Safety Law poster and Employer's Liability insurance details are displayed in the company's head office, with copies of the information available via the company's web portal.
- The Operations Coordinator will ensure that necessary safety, health and environment information is provided to employees and subcontractors (via the Operations Manager for site personnel).
- Health and safety advice is available from Phase Consultants Limited (Telephone: 01273 487355).

ACCIDENTS, FIRST AID AND WORK-RELATED ILL HEALTH

- Any necessary health surveillance will be arranged and records kept by the Operations Coordinator.
- First aid kit is available in the head office, in all company vehicles and on each site where the company is providing services.
- Nominated personnel are trained to administer first aid in addition to basic first aid skills held by site personnel as part of their SIA training.
- All accidents, dangerous incidents and cases of work-related ill health must be recorded in the accident book held at the company's head office, using the Accident form and Incident form contained in the Assignment Instructions as necessary.
- The Operations Coordinator is responsible for reporting accidents, diseases and dangerous occurrences to the enforcing authority where required by law.
- Employees and subcontractors must inform the Operations Coordinator of any medical conditions which they have and which impact upon their work duties in order that the company can address such conditions when planning the employees' and subcontractors' work activities, and managing those of the employees.
- Adequate first aid provision will be made at every place of work occupied by the Company.
- Each first aid box shall be suitably marked and be easily accessible to all employees at all times when they are at work.
- Sites – wherever possible arrangements are made with clients to use their first aid facilities. Where this is not possible, a member of the project team will be nominated as the appointed person for first aid and a first aid box supplied, which will contain adequate supplies for the total number of employees on site.
- Head Office – the first aid box is located in the kitchen.
- The Qualified First Aiders are Ed Mills, Som Chochangi and Will Fox. All other personnel have basic first aid training within their SIA training provision.
- All accidents **MUST** be reported to the Operations Manager and the details recorded in the accident record sheet in the Assignment Instructions held on site. Serious accidents or accidents where hospital treatment is required must be reported to the Operations Manager as soon as possible after the incident.
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) requires certain accidents to be reported to the HSE's Incident Contact Centre. The Operations Manager must be notified as soon as practicable after incidents causing the following injuries:
 - any work related injury that leads to an employee being absent from usual work duties for more than 7 working days;
 - fracture other than to fingers, thumbs or toes;

- amputation;
 - dislocation of the shoulder, hip, knee or spine;
 - loss of sight (temporary or permanent);
 - chemical or hot metal burn to the eye or any penetrating injury to the eye;
 - injury resulting from an electric shock or electrical burn leading to unconsciousness or requiring resuscitation or admittance to hospital for more than 24 hours;
 - any other injury: leading to hypothermia, heat-induced illness or unconsciousness; or requiring resuscitation; or requiring admittance to hospital for more than 24 hours.
- All accidents / incidents will be investigated by the Operations Coordinator and the Operations Manager with the following objectives;
 - To determine the cause(s) with a view to preventing a recurrence.
 - To gather information for use in any criminal or civil proceedings.
 - To confirm or refute a claim for industrial injury benefit.
 - To prepare notification to be made to the Health and Safety Executive
 - The degree of investigation will be dependent on the seriousness of the accident. The aim of the investigation will be to seek to answer the following questions;
 - WHAT caused the accident?
 - WHO was involved?
 - WHEN did it occur?
 - WHY did it occur?
 - HOW could it have been prevented?
 - HOW can a recurrence be prevented?

PERSONAL PROTECTIVE EQUIPMENT (PPE)

- Appropriate personal protective equipment will be issued to employees as and when necessary for work activities.
- Training will be provided for employees on the safe use, storage and maintenance of the relevant equipment before issue, and a written record detailing what PPE has been issued will be signed by the employees on receipt of the equipment and the hard copy kept on file.
- Employees and sub contractors have a legal duty to wear PPE as specified in relevant site rules, risk assessments and method statements.
- Any defects or malfunction of PPE must be reported to the Operations Manager.

MANUAL HANDLING

- Manual handling operations will be risk assessed to determine suitable control measures for the management of risk and the company will endeavour to eliminate manual handling operations where practicable with any remaining risks being controlled by;
 - reducing weights;
 - reducing the frequency of manual handling;

- the use of additional labour;
- through the provision of suitable equipment to assist in the operation;
- the selection of persons to carry out manual handling or lifting tasks will be based on the training given, age, physique etc.

DRUGS AND ALCOHOL

- Employees and subcontractors must inform the Operations Coordinator of any prescription drugs or medication which they are using and which might impact upon their work activities (drowsiness, fatigue, etc.)
- The abuse of alcohol or drugs (other than the use of prescribed drugs – see above) is prohibited and anyone who is found to be under their influence during working hours will be subject to disciplinary action which may include dismissal.

CONSULTATION WITH EMPLOYEES AND SUBCONTRACTORS

- Consultation with employees and subcontractors will be via regular verbal contact and by the provision of information and training.

CONTRACTUAL RESPONSIBILITIES

- Failure to comply with the requirements of the company's health and safety policy and the accompanying arrangements for managing safety health and environmental matters may result in disciplinary action being taken and could lead to the termination of employment (employees) or contractor agreement (subcontractors).

REVIEW

- This policy will be kept up to date, particularly as the business changes in nature and size. To ensure this, the policy and the way in which it is implemented will be reviewed every year. In addition, reviews of risk assessments, COSHH assessments, site safety inspections and associated matters will take place from time to time.