

## QHSE Policy

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Nationwide Platforms Limited is a specialist Powered Access Rental Company providing work at height equipment & training solutions. We are committed to ensuring that Quality, Health, Safety & Environmental Management is an integral part of all company operations, led and supported by the Senior Management Team.

The company strives to achieve continual QHSE improvement and will:

- Ensure suitable resources are available for the effective implementation of this policy.
- Set QHSE objectives & targets, reviewed annually by Senior Management to ensure continual improvement in quality standards, waste reduction, energy management pollution control & reduction of injury & ill health.
- Meet all relevant legal requirements & the policies, standards & expectations of our parent company, Loxam.
- Ensure QHSE planning & risk management is an integral part of our 'business as usual' management processes.
- Provide guidance, training, and procedures for Staff & Contractors to enable them to comply with and contribute to this policy.
- Undertake QHSE, inspections audits & Management reviews to ensure that the policy remains effective.
- Consider environmentally sustainable practices & energy efficient power sources where practicable.
- Maintain an QHSE Management System accredited to ISO 9001:2015, ISO 14001:2015 & ISO45001:2018.
- Monitor and review EHS procedures to ensure standards are maintained whilst highlighting potential areas for continual improvement.

This policy will be reviewed at least annually as part of our commitment to continual improvement and will be made available to clients and the public on request. The scope of our policy and management system will include all company offices, depots, and sites within the UK.



**Paul Rankin**  
**Managing**  
**Director**

10<sup>th</sup> February 2025

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## QHSE Policy

### 1.0 QHSE Policy

The Company will so far as is reasonably practicable, take all measures to ensure the health, safety and welfare of all employees and other people who may be affected by its operations. This Policy is the direct concern of the board of Directors and other Senior Managers and will be actively pursued so as to ensure that all measures are implemented. The Company HSE Director is the competent person to assist the Managing Director in the implementation of the policy.

This statement will be brought to the notice of all employees who will be actively encouraged to submit ideas for improving the general standards of Health, Safety and Welfare at sites, works and offices.

### 1.1 Health & Safety Provisions:

In securing the implementation of this policy the Company will ensure that provisions for meeting the requirements of The Health and Safety at Work etc. Act 1974 (HSAWA) and the Management of Health & Safety at Work Regulations 1999 (MHSWR), in conjunction with other Acts and Subordinate Regulations mentioned in this statement are regarded as the minimum requirements of Health and Safety.

In accordance with the Health & Safety (Consultation with Employees) Regulations 1996, the Company will appoint a “Health & Safety Representative” at each location. Senior Management and the Regional HSE Manager’s will review Health & Safety Performance at monthly meetings.

The main provisions are to:

- Ensure that all hazards and risks associated with work activities are identified and then eliminated, controlled or reduced to reasonably practicable levels.
- Provide a safe working environment, which either eliminates, isolates, controls the risk or reduces the risk to health and safety as far as is reasonably practicable.
- Provide suitable facilities and equipment to protect the health and safety of employees and other persons.
- Provide adequate welfare facilities.
- Ensure that all employees are provided with the information, instruction and training necessary to ensure the safe completion of their tasks.
- Encourage staff to identify and report hazards so that we can all contribute towards improving safety.
- Ensure that emergency procedures are in place at all locations for dealing with health and safety issues.
- Maintain our premises, provide and maintain safe plant and equipment.
- Only engage contractors who can demonstrate due regard to health & safety matters.
- Provide adequate resources and training to manage the health and safety risks arising from our work activities.

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It is the legal duty, (under Section 7 of HASAWA), of each employee whilst at work to:

- Take reasonable care for the health and safety of themselves and others who may be affected by their acts or omissions.
- Co-operate with the employer regarding any statutory duty or requirement imposed on the Company so far as is necessary to enable that duty or requirements to be performed or complied with.
- To ensure that no person shall intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety or welfare in pursuance of any relevant statutory provisions.

### 1.2 Environmental Provisions

In securing the implementation of this policy the Company will ensure that provisions for meeting the requirements of the Environmental Protection Act 1990 and all other relevant Regulations as the minimum requirements to eliminate as far as is reasonably practicable and to reduce to the lowest possible level any actions that may lead to environmental damage.

The company will ensure that: -

- All actions associated with work activities that may affect the environment are identified and managed using best available techniques not entailing excessive costs.
- Bring this Environmental Policy Statement to the attention of all stakeholders.
- Carry out regular audits of the environmental management system.
- Comply fully with all relevant legal requirements, codes of practice and regulations at International, National and Local levels.
- Eliminate risks to the environment, where possible, through selection and design of materials, buildings, facilities, equipment and processes.
- Ensure that emergency procedures are in place at all locations for dealing with environmental issues.
- Establish targets to measure the continuous improvement in our environmental performance.
- Identify and manage environmental risks and hazards.
- Improve the environmental efficiency of our transport and travel.
- Involve customers, partners, clients, suppliers and subcontractors in the implementation of our objectives.
- Minimise waste and increase recycling within the framework of our waste management procedures.
- Only engage contractors and suppliers who can demonstrate due regard to environmental matters.
- Prevent pollution to land, air and water.
- Promote environmentally responsible purchasing.
- Provide adequate resources to control environmental risks arising from our work activities.
- Provide suitable training to enable employees to deal with their specific areas of environmental control.
- Set targets to reduce the use of water, energy and any other natural resources.
- Source materials from sustainable supply, when practicable.

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The implementation of these provisions is the responsibility of all employees. The Nationwide Platforms Senior Management Team is responsible for the overall implementation of the policy and procedures. Compliance with the Policy and Procedures will be monitored by the HSE Director who will report to the Senior Management Team monthly. The Policy will be reviewed annually or more frequently as deemed necessary.

An electronic copy of the Master will be made available on the company Launch Pad and displayed in depots and offices.

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### 2.0 HSE Organisation & Responsibilities

The overall responsibility for health and safety rests at the highest management level. However, it is the responsibility of every employee to co-operate in providing and maintaining a safe place of work.

This part of our policy allocates responsibilities to line managers to provide a clear understanding of individuals' areas of accountability in controlling factors that could lead to ill health, injury or loss. Managers are required to provide clear direction and accept responsibility to create a positive attitude and culture towards health and safety.

The following positions have been identified as having key responsibilities for the implementation of our health and safety arrangements:

- Managing Director
- Chief Financial and Transformation Director
- Chief Operating Officer
- Directors and Managers Responsible for Head Office or Business Functions
- HSE Director
- Regional HSE Managers
- HR Director
- UK Fulfilment Director
- Head of Partnerships & Training
- Head of Procurement and Property Services
- Head of Operational Quality and Compliance
- Business Unit Directors
- Operations/Engineering/Regional Director
- Operations/Engineering/Regional Managers
- Blue Sky Manager
- Logistics Manager
- Location Service Manager/Workshop Service Manager
- Senior Service Engineer
- UK Group Fleet Controller
- Regional Transport Manager
- Transport Planners and Coordinators
- Regional and National Head of Sales / Sales Managers / Field Sales Managers
- Location Safety Representative
- Other employees

Responsibilities can be found in the QHSE Management System document, **Management QHSE Responsibilities**.

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### 3.0 HSE Arrangements

The Company's Policy & Management System has been designed to achieve the following and covers the arrangements detailed within this section of this document:

- The prevention of injury or illness to all persons affected by the Company's operations, damage to all property and damage to the environment.
- Provision of regular risk assessments with special regard to any new, modified or special procedures, which may be introduced.
- The provision and maintenance of safe plant, working conditions and methods of work.
- The issue and maintenance of personal protective equipment and clothing where the nature of the work being carried out and risk assessment requires this, in the interests of safety accident and illness prevention.
- Correct reporting, investigation of incident, injury, illness, damage and loss with a view to achieving a reduction in accident rates by analysing accident causes and trends and learning lessons. All reporting of accidents is to be carried out as per the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR). Recording of all accidents shall be via the AIM Line for escalation to the Regional HSE Manager's, HSE Director & Business Director.
- Adequate and appropriate training of all staff including induction into Company procedures and full involvement in safety related matters.
- That personnel always observe safe-working practices, with particular reference to relevant Codes of Practice.
- The prevention of damage to the environment.
- Continual improvement of environmental performance.
- Provision of regular assessments of environmental aspects regarding any new, modified, or special procedures, which may be introduced.
- The provision and maintenance of working conditions and methods of work that eliminate or reduce environmental impact.
- Correct reporting, investigation and costing of Environmental impacts or damage with a view to a reduction of causes.

### 3.1 Accident, Incident and Ill-Health Recording, Reporting and Investigation

The **Accident, Incident and Near Miss Reporting procedure** sets out the steps to be taken to record, report and investigate all accidents, incidents and near misses.

All accidents and incidents including personal injury, damage, environmental and vehicle incidents must be reported via the Accident Incident Management (AIM) Line on 07920 100 900 immediately or as soon as it is safe to do so. The AIM Line is a managed call centre available 24/7.

Safety Observations (positive and negative) and near misses are to be reported via the AIM Line portal or phone application.

The LSM/WSM will undertake the appropriate level of investigation based on severity and escalate the issue to support closure as necessary.

All incidents are to be investigated in line with company procedures and uploaded on to the AIM Line Database.

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### 3.2 Asbestos

The relevant controlling regulation is the Control of Asbestos Regulations 2012 (CAR2012). The Senior Management Team recognise its obligations under these regulations and delegate responsibility to the Senior Management Team member responsible for property (in the case of building infrastructure) or engineering (in the case of contaminated machines).

The primary areas of risk for the employees are:

- Asbestos containing materials (ACMs) within the building infrastructure.
- Potential exposure arising from machines returned by customers which have been used where asbestos was present and debris, particles or fibres remain.

#### ACMs within the building infrastructure

The company maintains a register of all company sites which are known to contain Asbestos. Each known site has a formal assessment on an annual basis undertaken by an appointed specialist company. Action is authorised by the Senior Management Team responsible for property and executed in line with recommendations of the specialist company.

All LSM/WSMs at sites where asbestos exists are supplied with a copy of the annual report and are required to make interested parties aware of the presence of asbestos on site. Interested parties include all employees and contractors required to perform works on the site.

Details of the presence of asbestos are identified in the site induction.

No work is to be performed on sites where asbestos is present unless and until the risk assessment and method statements are approved by the member of the Senior Management Team responsible for property. Any damage to ACM must be reported to the AIM line and the area secure from unauthorised access pending appropriate mitigation.

**The Asbestos Management Plan and Procedure and the Asbestos Management system** can be found on Launch Pad.

#### Machines contaminated with Asbestos.

Risk assessment **GWARA 5024** states clearly that under no account should ANY employee attempt to remove any contamination that they suspect to be an Asbestos Containing Material (ACM) but immediately contact their line manager for advice.

The **GWARA 5024** sets out the processes to be followed in the event that asbestos presence is suspected by the driver (collecting the machine) or the member of the engineering team about to work on the machine.

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### 3.3 Communication and Consultation

It is a legal requirement for the company to establish arrangements to communicate and consult with employees on issues affecting their health and safety and to take account of their views.

To achieve this objective, we will:

- Establish effective lines of communication.
- Involve and consult with employees through:
  - individual conversations
  - notice boards
  - internal publications
  - staff meetings
  - health and safety meetings
- Display the 'Health and Safety Law – What You Need to Know' poster.
- Consult with employees when changes to processes, equipment, work methods, incident trends etc. that may affect their health and safety.

Where it is not practical to consult with all employees directly and it would be more appropriate to communicate and consult through employee safety representatives, this will be done through regular safety representative meetings, with the requirement for safety representatives to feed back to employees at their location.

The company will allow all representatives an appropriate amount of time away from their normal duties in order to complete their duties as representatives. We will not hinder representatives in the execution of their normal functions as defined by law.

### 3.4 Contractors

In order to meet our legal obligations regarding contractors we will ensure that prior to engaging any contractor they are competent and that any works are carried out safely.

The following factors will be considered as part of our procedures for vetting contractors:

- Sight of the contractor's relevant safe industry safety accreditation if applicable, own safety policy, risk assessments, method statements, permits to work, etc as applicable.
- Clarification of the responsibility for provision of first aid and fire extinguishing equipment
- Details of articles and hazardous substances intended to be brought to site, including any arrangements for safe transportation, handling, use, storage and disposal.
- Details of plant and equipment to be brought onto site, including arrangements for storage, use, maintenance and inspection.
- Clarification for supervision and regular communication during work including arrangements for reporting problems or stopping work in cases where there is a serious risk of personal injury.
- Confirmation that all workers are suitably qualified and competent for the work (including a requirement for sight of evidence where relevant)
- Evidence showing that appropriate Employers and Public Liability Insurance is in place.

It may not be necessary to go to such elaborate lengths if the contract is very short and will not create hazards of any significance. The complexity of the arrangements will be directly proportional to the risks and consequences of failure.

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Similarly, we have a parallel duty to the contractor and must ensure that the contractor is not put at risk by our own activities for the duration of the contract.

We will stop contractors working immediately if their work appears unsafe. Staff should report any concerns to a manager immediately.

Contractors are required to sign into site and be inducted by a member of staff.

### Construction work and the Construction (Design and Management) Regulations

Where any construction work is carried out, to fulfil our legal duties as a “client” under the Construction (Design and Management) Regulations we will:

- Make suitable arrangements for the management of the project and review those arrangements throughout the project to ensure that they are still relevant.
- Ensure that all duty holders that we appoint have the necessary skills, knowledge, training and experience to carry out their roles safely.
- Appoint in writing the Principal Designer and Principal Contractor sufficiently early in the project to allow them to carry out their duties properly.
- Notify the HSE in writing for projects that require it.
- Ensure that relevant pre-construction information is passed to all designers and contractors.
- Ensure that the Principal Designer and Principal Contractor carry out their duties.
- Ensure that adequate welfare facilities are provided for the contractors.
- Ensure that no construction commences until an adequate health and safety plan and construction phase plan covering the work has been prepared.
- Ensure that any health and safety file passed to us is kept securely and readily available for inspection by anyone who requires it to fulfil their legal duties, and, if we choose to dispose of the building, to pass the file to any person or company who acquires the building.
- Cooperate fully with all other duty holders and provide all relevant information and instruction promptly and clearly.

### 3.6 Disabled Persons

The company will give full and proper consideration to the needs of disabled employees and visitors.

To achieve this, the company will, as set out in the **Equal Opportunities Policy**:

- Treat all disabled employees and visitors with respect and dignity, both in the provision of a safe working environment and in equal access to the organisation’s facilities.
- Ensure that risk assessments are undertaken of the special needs of the disabled and carry out reasonable adjustments to the premises and/or employment arrangements.
- Encourage employees with special needs to suggest any premises or task improvements to their line managers.
- Discipline any employees found treating their disabled colleagues with less than the expected standards of respect and dignity.
- In an emergency evacuation, ensure suitable plans are in place which will assist disabled people to leave the premises swiftly.

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### 3.7 Display Screen Equipment

All reasonable steps will be taken by the company to secure the health and safety of employees who work with display screen equipment (DSE).

To achieve this objective the company will:

- Provide training highlighting the risk and workstation set up.
- Ensure an assessment of each user's workstation is undertaken.
- Implement necessary measures to remedy any risks found as a result of the assessment.
- Provide adequate information and training to persons working with display screen equipment.
- Endeavour to incorporate changes of task within the working day, to prevent intensive periods of on-screen activity.
- Review software to ensure that it is suitable for the task and is not unnecessarily complicated.
- Arrange for the provision of funded eye tests when requested, at regular intervals thereafter and where a visual problem is experienced.
- Arrange for assistance with the supply of any corrective appliances (glasses or contact lenses) where these are required specifically for working with display screen equipment.
- Advise existing employees, and all persons applying for work with display screen equipment, of the risks to health and how these are to be avoided.
- Investigate any discomfort or ill-health believed to be associated with the use of display screen equipment and take appropriate remedial action.
- Make special arrangements for individuals with health conditions that could be adversely affected by working with display screen equipment.

Employees must:

- Comply with the instructions and complete the training regarding safe workstation set-up and use, including the need for regular changes of activity or breaks and the use of the equipment provided.
- Inform their line manager of any disability or health condition which may affect their ability to work using display screen equipment or be affected by working with DSE (this information will be treated confidentially).
- Report to their line manager any discomfort or health concern believed to be associated with the use of DSE (this information will be treated confidentially).

### 3.8 Driving for Work

Driving is an integral part to some roles within the company and as such requires driving on company business. Driving has inherent risks associated with it which drivers should be made aware of.

The company is committed to reducing the risks its staff face or create when driving at work and therefore will:

- Ensure risk assessments are completed and that journeys are planned.
- Not put unreasonable time constraints on travel.
- Ensure those driving for business are competent (and where required, authorised) and fit.
- Provide any additional training that may be deemed necessary to reduce driving related occupational risks.
- Provide sufficient information and guidance for managers and drivers to enable them to understand the additional occupational risks involved in driving.
- Require drivers who receive a car allowance from the business, to annually submit copies of their insurance, the MOT certificate or evidence of the MOT exemption for their vehicle and their current driving licence.

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- Consider safety and the environment when selecting company vehicles.
- Provide access to breakdown support and recovery.

When providing company vehicles, the company will:

- Maintain them to the required legal standard and ensure they are suitable for their purpose.
- Provide and maintain additional tools and equipment necessary for the purposes of the journey.

### Implementation

The company asks its entire staff to play their part, whether they use a company vehicle, their own or a hire vehicle.

### Drivers

Drivers will remain responsible for their safety and others and must comply with the Highway Code and Road Traffic Act.

It is the responsibility of drivers to inform their manager of:

- Anything that could affect their driving e.g. health conditions or injuries, use of prescribed medication.
- Changes to licence such as limitations, offences recorded, period bans.
- Vehicle defects that affect ability / safety to drive.
- Maintain the company vehicle in line with manufacturer requirements and always keep the car clean and tidy.
- Any accidents / incidents that occurred whilst driving on behalf of the company.

Before driving, drivers must:

- Review the need to travel.
- Have a valid licence for the vehicle they are driving and for any overseas travel if required.
- Ensure valid insurance for business use.
- Carry out a pre-use vehicle check and establish that the vehicle is roadworthy, as specified by the highway code.
- Allow sufficient time to drive allowing for traffic, poor weather and rest breaks.
- Ensure sufficient rest.
- Be physically fit, with zero alcohol level and not under the influence of drugs that may affect the ability to drive.
- Adjust their driving position, head restraints and mirrors to ensure maximum comfort and safety.

Whilst driving, drivers must:

- Drive in accordance with the applicable law and with consideration for the safety of passengers and other road users.
- Take regular rest breaks every 2-3 hours or at first signs of tiredness.
- Always remain in control of the vehicle.
- Not smoke or permit others to smoke in a company vehicle.

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- Only use hands free electronic devices e.g. mobile phone, satellite navigation, mp3 player, when safely set up to do so i.e. using an appropriate hands-free device.
- Follow all safety instructions when taking their vehicle on board ferries, trains or other vehicle-carrying craft, including parking and leaving their vehicle on a vehicle deck and travelling in a designated passenger area while the craft is underway.

### Managers

Managers should ensure that the driving policy is brought to the attention of drivers, and they will:

Lead by example, both in the way they drive and by not tolerating poor driving practices amongst colleagues.

- Challenge unsafe attitudes and behaviours and encourage staff to drive safely.
- Monitor compliance with the driving policy at team meetings, staff appraisals and periodic checks.
- Not expect staff to attend teams' meetings whilst driving.

For further information in relation to driving for work employees and managers should refer to the following documents:

- **Driver's handbook**
- **HGV Policy**
- **Van Policy**
- **Car Policy**
- **Use of Handheld Mobile Devices and In Vehicle Technology When Driving Procedure**

### 3.9 Drugs and Alcohol

Employees must refer to the **Drug and Alcohol Policy**.

#### Alcohol

Employees must not drink alcohol on the company's premises or the premises of its customers or clients.

Any employee who is found consuming alcohol on the company's premises or the premises of its customers and clients or is found to be intoxicated at work may be subject to disciplinary action on the ground of gross misconduct under the company's disciplinary procedure.

#### Drugs and medication

The possession, use or distribution of prescribed or non prescribed drugs for non-medical purposes on the company's premises is strictly forbidden and a gross misconduct offence.

If you are prescribed drugs by your doctor which may affect your ability to perform your work, you should raise this with your line manager immediately.

If the company suspects there has been a breach of this policy or your work performance or conduct has been impaired through substance abuse, the company reserves the right to require you to undergo a drug and alcohol screening test.

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**Drug and Alcohol Testing** Existing and prospective employees may be asked to undergo a drugs and alcohol test, which will seek to determine whether they have taken a controlled drug or is under the influence of alcohol.

A refusal to give consent to such an examination or a refusal to undergo the screening will result in the immediate withdrawal of any offer made to prospective employees and will normally be treated as gross misconduct for employees.

If, having undergone drugs and alcohol screening, it is confirmed that you have been positively tested for a controlled drug, or you admit there is a problem, the company reserves the right to suspend you from your employment (with or without pay) to allow the company to decide whether to deal with the matter under the terms of the company's disciplinary procedure and/or to require you to undergo treatment and rehabilitation.

### Reasonable Grounds

The company reserves the right to search you or any of your property held on company premises at any time if there are reasonable grounds to believe that this policy is being or has been infringed or for any other reason. If you refuse to comply with these search procedures, your refusal will normally be treated as gross misconduct.

The company reserves the right to inform the police of any suspicions it may have regarding to the use of controlled drugs by its employees on the company's premises.

### 3.10 Electricity

All reasonable steps will be taken to secure the health and safety of employees who use, operate or maintain electrical equipment.

To ensure this objective the company will:

- Ensure electrical installations and equipment are installed in accordance with the Wiring Regulations (BS 7671) published by the Institution of Engineering and Technology (IET)
- Maintain the fixed installation in a safe condition by carrying out routine safety tests.
- Inspect and test portable and transportable equipment as often as required to ensure safety.
- Promote and implement a safe system of work for maintenance, inspection and testing.
- Forbid live working unless absolutely necessary, in which case a permit to work system must be used.
- Ensure employees who carry out electrical work are competent to do so.

Maintain detailed records. Employees must:

- Visually check electrical equipment for damage before use.
- Report any defects found to their line manager/supervisor.
- Not use defective electrical equipment.
- Not carry out any repair to any electrical item unless qualified to do so.
- Switch off non-essential equipment from the mains when left unattended for long periods.
- Not bring any electrical item onto the company premises until it has been tested and a record of such a test has been included in the appropriate record.
- Not leave electric cables in such a position that they will cause a hazard or risk damage.

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### 3.11 Environment

All reasonable steps will be taken to protect the environment. In order to discharge its responsibilities, the management will:

- Comply fully with all relevant legal requirements, codes of practice and regulations.
- Prevent pollution to land, air and water.
- Set targets to reduce water and energy use.
- Minimise waste and increase recycling within the framework of our waste management procedures.
- Identify and manage environmental risks and hazards.
- Involve customers, partners, clients, suppliers and subcontractors in the implementation of our objectives.
- Promote environmentally responsible purchasing.
- Provide suitable training to enable employees to deal with their specific areas of environmental control.
- Improve the environmental efficiency of our transport and travel.
- Establish targets to measure the continuous improvement in our environmental performance.
- Eliminate risks to the environment through selection and design of buildings, facilities, equipment and processes. Where risks cannot be eliminated, they will be minimised by the use of physical controls or, as a last resort, through systems of work and personal protection.
- Only engage contractors who can demonstrate due regard to environmental matters.
- Bring the HSE Policy Statement to the attention of all employees.

Environmental complaints will follow the **accident, incident, near miss reporting and investigation process**.

### 3.12 Fire

All reasonable steps will be taken to prevent a fire occurring. In the event of fire, the safety of life will override all other considerations, such as saving property and extinguishing the fire.

In order to prevent fire and to minimise the likelihood of injury in the event of a fire the company will:

- Assess the risk from fire at our premises and implement appropriate control measures.
- Ensure good housekeeping standards are maintained to minimise the risk of fire.
- Provide and maintain safe means of escape from the premises.
- Develop a fire evacuation procedure for all buildings.
- Provide and maintain appropriate fire-fighting equipment.
- Regularly stage fire evacuation drills, inspect the means of escape and test and inspect fire-fighting equipment, emergency lighting and any fire warning systems.
- Provide adequate fire safety training to employees, plus specialist training to those with special responsibilities.
- Make arrangements for the safe evacuation of deaf or otherwise disabled persons.
- Make arrangements for ensuring all visitors are made aware of the fire evacuation procedures.
- Display fire action notices.
- Keep fire safety records.

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The company does not require persons to attempt to extinguish a fire, but extinguishing action may be taken if it is safe to do so.

Immediate evacuation of the building must take place as soon as the evacuate signal is given. All occupants, on evacuation, should report to the pre-determined assembly points.

Re-entry of the building is strictly prohibited until the fire brigade officer, or a senior person present declares it is safe to do so.

Employees are encouraged to report any concerns regarding fire procedures so the organisation can investigate and take remedial action if necessary. This section is to be read in conjunction with the **Emergency Preparedness and Response Procedure**.

### 3.13 First Aid

The company is committed to providing sufficient provision for first aid to deal with accidents and injuries that arise at work.

To achieve this objective the company will:

1. Appoint and train a suitable number of first aid personnel to cover all work patterns.
2. Display first aid notices with details of first aid provision.
3. Provide and maintain suitable and sufficient first aid facilities including first aid boxes and Defibrillators.
4. Provide any additional first aid training that may be required to deal with specific first aid hazards.

The minimum first aid provision at all sites is an adequately stocked first aid box with all contents in date and an Appointed Person to take charge of the first aid arrangements.

#### Appointed Person

The Appointed Person duties include:

- Taking charge when someone falls ill or is injured, including calling an ambulance if required.
- Looking after and maintaining the first aid box and contents.

The Appointed Person will not be required to provide treatment for which they have not been trained.

#### First Aiders

First aiders are qualified personnel who have received training and passed an examination in accordance with HSE requirements.

The numbers of first aid personnel at each location will be determined by individual circumstances, the level of risk and in line with current government guidance.

First aid personnel will be provided with refresher training at regular intervals to keep their skills up to date.

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### First Aid Boxes

First aid boxes will be provided within the workplace to ensure there are adequate supplies for the nature of the hazards involved. All boxes will contain at least the minimum supplies suggested by L74: First Aid at Work Approved Code of Practice. Only specified first aid supplies will be kept. No creams, lotions or drugs, however seemingly mild, will be kept.

### Defibrillators (AED – Automated External Defibrillator)

Defibrillators (AED) are made available at each location and appropriately sign posted. This is also included in the induction process where they can be located.

First Aiders will have completed the relevant training during their First Aid course, however, training to use the equipment is not required as the Defibrillator (AED) intelligently guides the user with calm voice prompts and large, clear illustrations which illuminate to highlight key commands. Instructions are given at every step.

The Defibrillators to be registered on The Circuit Website which is part of The British Heart Foundation where upkeep of the Defibrillators (AED) is looked after, including pads and battery life.

### Portable First Aid Kits

Portable first aid kits will be available for staff members required to work away from the normal workplace, where access to facilities may be restricted, such as:

- Work with potentially dangerous tools and machinery away from base location.
- Staff travelling in LGV, SV and van type vehicles on a regular basis.
- Staff whose work takes them to isolated or remote locations.

## 3.14 Forklift Trucks and Telehandlers

All reasonable steps will be taken by the company to ensure the health and safety of employees engaged in or affected by lift truck operation.

To achieve this policy, we will:

- Carry out risk assessments covering the movement of forklift trucks.
- Provide suitable trucks for the type of goods to be moved.
- Maintain trucks in accordance with the manufacturer's recommendations.
- Arrange for all plant and lifting gear to be examined at least annually by a competent person.
- Keep records of all maintenance and examinations for a minimum of 2 years.
- Provide training to all forklift truck/telehandler drivers.
- Authorise all truck drivers in writing and prohibit use of forklift trucks/telehandlers by other employees.
- Arrange for drivers to carry out and record daily pre-use checks.
- Provide a well-ventilated area for charging of batteries.
- Provide a well-ventilated area for changing of gas cylinders.

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Whilst driving, drivers must:

- Drive with consideration for the safety of pedestrians.
- Ensure that are not under the influence of drugs and/ or alcohol.
- Always remain in control of the forklift truck.
- Not smoke in a forklift truck.
- Never use any handheld electronic device e.g. mobile phone, satellite navigation, mp3 player while driving.
- Adhere to all relevant site traffic rules.

### 3.15 Hazardous Substances (COSHH)

All reasonable steps will be taken to ensure all exposure of employees to substances hazardous to health is prevented or at least controlled to within statutory limits.

The company will implement the following:

- Maintain an inventory of all substances hazardous to health kept or present on site and retain copies of relevant hazard data sheets using the Sypol database system.
- COSHH risk assessments will be completed using the Sypol database system and updated as necessary. All operational line managers will have access to the system.
- All operations which involve, or may involve, exposure to substances hazardous to health will be assessed and appropriate control measures will be taken if elimination or substitution of the substance is not possible.
- Engineering controls will be properly maintained by planned preventive maintenance and annual performance monitoring to ensure continued effectiveness.
- Systems of work will be reviewed at suitable intervals and revised if necessary.
- All employees and others who may work in the affected areas will be informed of the purpose and safe operation of all engineering controls.
- Personal protective equipment (PPE) will only be used as a last resort or as a back-up measure during testing or modification of other controls.
- The type and use of PPE will be carefully assessed and maintained according to manufacturers' instructions.
- Assessments will be reviewed periodically or if changes to the operation or any hazardous substances used.
- Qualified professionals, where necessary, will carry out health surveillance.
- Employee health records of all exposures to substances hazardous to health will be kept in line with legal requirements.
- All employees will be provided with understandable information and appropriate training on the nature of the hazardous substances they work with.
- Employees will be informed about any monitoring and health surveillance results.
- All changes to control measures and changes of PPE will be properly assessed and no new substances will be introduced into the workplace without prior assessment.

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### 3.16 Health, Safety & Welfare

The company is committed to providing suitable health, safety and welfare facilities in line with current legislation, in particular the provision of:

- Adequate maintenance of workplace and equipment.
- Appropriate ventilation, temperature control and lighting.
- Suitable cleanliness and housekeeping standards.
- Adequate workspace allocation.
- Properly designed workstations.
- Well maintained traffic routes and floors.
- Appropriate fall protection.
- Suitable glazing.
- Safe access and egress (well-maintained exits and entrances).
- Appropriate sanitary and washing facilities.
- Separate toilet facilities for men and women and persons with disabilities.
- Plentiful wholesome drinking water supply and cups.
- Seating with an incorporated back rest.
- Accommodation for keeping clothing clean and dry.
- Facilities for changing rest periods, hot drinks and meals preparation.
- Showering facilities if the nature of an employees' work requires this.
- Appropriate first aid provision.
- Appropriate emergency, fire and evacuation equipment and procedures.

The company recognises these responsibilities are required for any work whether on a remote work site, at their usual workplace or head office.

### 3.17 Health Surveillance

Health surveillance is the early detection of adverse health risks associated with work activity. It allows staff at increased risk to be identified and additional precautions to be taken as necessary. It is also a means of checking the effectiveness of the existing control measures.

To ensure adequate health surveillance is implemented the company will along with our Occupational Health Partner:

- Carry out risk assessments to identify those activities, processes or materials that are likely to give rise to a health risk.
- Ensure that adequate control measures are put in place to reduce risks as far as reasonably practicable.
- Seek advice on risk reduction from our HSE Team, occupational hygienist or other relevant persons as necessary.
- Seek the advice of relevant people on the need for health surveillance where it is thought that a residual health risk remains following the implementation of control measures.
- Advise employees of the health risks and the signs of ill health.
- Ensure employees co-operate with health surveillance procedures provided.
- Discuss with the relevant people any health concern brought to their attention by an employee.

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### Format of Health Surveillance

If a reliable test can be carried out, the format of health surveillance may include the use of questionnaires to determine symptoms and may also involve clinical examination or measurements, such as lung function testing, hearing tests or biological sampling.

### Frequency of Health Surveillance

The level of risk will determine the frequency of health surveillance programmes. Where the risk is thought to be low, only baseline data will be required, and staff should report to their line manager if any problems are experienced. Baseline data will usually be gathered at the employment on boarding process.

If the risk is thought to be more significant, periodic health surveillance for all exposed staff will take place. The frequency of health surveillance will be determined by assessments undertaken in conjunction with our Occupational Health Partners. More frequent surveillance may be required where a person's medical history suggests a particular vulnerability. The responsible person or occupational health practitioner will make this decision and manage the recall process.

If health problems are identified following health surveillance, control measures will be reviewed and where necessary enhanced.

The occupational health practitioner will advise on any specific actions to take regarding the affected employee, e.g.:

- Reducing the length of exposure.
- Restricting work activities which cause exposure.
- Re-deploying the affected employee.
- Advising on additional personal protective equipment (PPE).

### Record Keeping

The occupational health partner will, with the support of line managers, ensure employees requiring health surveillance are identified and recalled at appropriate intervals.

Health records will be kept in line with legal requirements.

Employees will be allowed reasonable access to their health records and a copy offered to individuals when they leave the company.

## 3.18 Legionnaires Disease

All reasonable steps will be taken to identify potential legionellosis hazards and to prevent or minimise the risk of exposure.

To achieve control of legionella bacteria the company will implement the following:

### Avoidance of Conditions Favouring Growth of Organisms

As far as practicable, water systems will be operated at temperatures that do not favour the growth of legionella. The recommended temperature for hot water is 60°C and either above 50°C or below 20°C for distribution, as care must be taken to protect people from exposure to very hot water.

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The use of materials that may provide nutrients for microbial growth will be avoided. Corrosion, scale deposition and build-up of bio films and sediments will be controlled, and tanks will be lidded.

### Avoidance of Stagnation

Dead legs, which occur when water services leading from the main circulation water system to taps or appliances, are used only intermittently and other parts of systems which may provide a reservoir for infection will be identified and where possible eliminated.

### System Maintenance

Water systems will be disinfected by an effective means before being taken into service and after periods of inactivity of five or more days. Plant will be regularly inspected and maintained (e.g. by monthly visits from a water treatment specialist). Plant will be disinfected periodically (normally twice yearly) by chlorination or by temporarily raising water temperatures. Biocides may be used to control microbial growth. Any work of this nature will be carried out by the specialist partner engaged to manage legionella risk.

### Sampling

Sampling for legionella will not normally be necessary, unless in the case of an outbreak or to monitor the effectiveness of precautionary measures in which case regular monitoring of chemical and microbiological water quality will be carried out to give a useful indication of the state of the system until risk has reduced or as advised by specialist contractors..

### Record Keeping

Records will be kept of all maintenance, temperature monitoring and sampling carried out.

### Selection, Training and Competence of Staff

Persons carrying out control measures will receive appropriate training and supervision, so they are able to perform their duties competently.

### Action in the Event of an Outbreak

A contingency plan in case of an outbreak of legionellosis will be prepared. This will include the:

- Identification of people who may have been exposed.
- Involvement of public health authorities
- Dissemination of information to employees and other interested parties as to the nature of the risks.

## 3.19 Lifting Operations and Equipment

All reasonable steps will be taken to ensure lifting operations and equipment are suitably managed with regards to health and safety.

### Definition

Lifting equipment includes any equipment used at work for lifting or lowering loads, including attachments used for anchoring, fixing or supporting it.

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## Implementation

The company will ensure that:

- Lifting equipment is suitable for the intended use with adequate strength and stability, including whatever guards are necessary to prevent:
  - persons or equipment falling from the lift.
  - the lift falling from its restraints.
  - persons or equipment being trapped, crushed or struck by objects when using the lifting equipment.
- An examination scheme is drawn up by a competent person. An external 3<sup>rd</sup> party specialist company or competent internal person will be used for examination of lifting equipment.
- Lifting operations will be properly planned by a competent person, appropriately supervised and carried out in a safe manner.
- Lifting equipment is maintained in a safe condition and examined/inspected by competent persons annually (or every six months if lifting people) to ensure correct installation and safe operation.
- Lifting equipment will be re-examined following relocation or conditions that may cause deterioration.
- Safe working load (SWL) is clearly displayed on all lifting equipment.
- Suitable training, instruction and information is provided for employees involved in completing lifting operations or supervising them.

## Records

All thorough examination reports will be kept for as long as the equipment is being used except for lifting accessories reports and reports carried out due to deterioration in condition, which must be kept for 2 years.

## 3.20 Lifts

All reasonable steps will be taken to maintain all lifts throughout the company premises.

## Implementation

The company will ensure that:

- An examination scheme is drawn up by a competent person for each lift.
- All lifts are fitted with appropriate barriers and interlocks to prevent passengers or cargo from falling from the lift, coming into contact with the lift machinery or entering/exiting the lift when it is not at a designated landing.
- Suitable equipment and mechanisms are installed to prevent the lift from:
  - leaving its landing when the doors are unlocked and/or open.
  - falling (including its maximum working load) in the event of a failure in the lifting mechanism
  - overrunning its furthest intended point of travel
  - being operated from more than one position at any one time
  - being overloaded or exceeding its maximum number of passengers.
- Lifts are maintained in a safe condition and examined/inspected by competent persons (annually for goods lifts and every six months if lifting people).
- The safe working load (SWL) is clearly displayed inside each lift.

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- Notices are posted adjacent to each lift opening advising against the use of a lift in the event of a fire.
- Arrangements are made for the emergency evacuation of persons in the event of lift failure.
- Lift motor rooms are kept locked and entry kept restricted to authorised persons.

### Records

All thorough examination reports will be kept for a minimum of 2 years.

### 3.21 Liquefied Petroleum Gas (LPG) and Compressed Gas

Gas cylinders are a convenient way to transport and store gases under pressure. These gases are used for many different purposes, including:

- Soldering, welding and flame cutting
- Chemical processes
- Fire extinguishers

The main hazards are:

- Impact from the blast of a gas cylinder explosion, or rapid release of compressed gas
- Impact from parts of gas cylinders that fail or any flying debris.
- Contact with the released gas or fluid.
- Fire resulting from the escape of flammable gases or fluids.
- Impact from falling cylinders.

Where LPG / Compressed Gas are used, the company will ensure that provision is made for:

- Adequate training and supervision in their use
- Suitable handling equipment, plant and storage facilities with adequate ventilation, security measures, and monitoring and control devices
- Regular maintenance and inspection by competent persons, and the recording of all maintenance and inspections.

### Handling and Use of Gas Cylinders

- Users must carry out an external visual inspection of the gas cylinders and any attachments (e.g. valves and regulators), to determine whether they are damaged. Indicators may include dents, bulges, evidence of fire damage etc.
- Use gas cylinders in a vertical position, unless specifically designed to use otherwise.
- Always double-check that the cylinder/gas is the right one for the intended use.
- Close the cylinder valve and replace dust caps, where provided, when a gas cylinder is not in use.
- Before connecting a gas cylinder to equipment or pipe work make sure that the regulator and pipe work are suitable for the type of gas and pressure being used.
- Wear suitable safety shoes when handling gas cylinders.
- Do not drop gas cylinders.
- Empty cylinders must be stored in a safe and secure manner and not disposed of with normal waste.
- Do not lift the cylinders by valves, shrouds and caps.

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### Transporting Gas Cylinders

- Fit suitable protective valve caps and covers to cylinders, when necessary, before transporting.
- Securely stow gas cylinders in an upright position to prevent them from moving or falling.
- Disconnect regulators and hoses from cylinders whenever practicable.
- Ensure gas cylinders are clearly marked to show their contents and the hazards associated with their contents.

### Storage of Gas Cylinders

- Store gas cylinders in a safe and secure manner.
- Gas cylinders containing flammable gas should not be stored in part of a building used for other purposes.
- Protect gas cylinders from external heat sources and ensure that gas cylinders are stored away from sources of ignition and flammable materials.
- Gas cylinders must be clearly marked to show what they contain, and the hazards associated with their contents.
- LPG cylinders should be stored away from drains and not in cellars.

## 3.22 Lone Working

A lone worker is defined as an employee who is working entirely alone for extended periods and does not include employees travelling to and from a location or where third-party contractors or others are present. All lone working must only be undertaken following a risk assessment.

Lone working at the company is categorised into three risk levels.

- High Risk Activities
- Medium Risk Activities
- Low Risk Activities

### High Risk Activities

- Undertaking night trunking driving
- Loading & unload of machinery in a depot or customer location.
- Engineering tasks in a depot or on site that require use of power tools.
- Engineering tasks in a depot or on site that require significant manual handling.
- High risk activities should become medium risk when adequately controlled.
- All high-risk activities must be undertaken with the use of the Skyguard Man Down personal alarm system to ensure suitable response in the event of an incident.

### Medium Risk Activities

- Site surveying at customer sites in remote or unattended locations
- Undertaking ANY other engineering activities alone in a depot.

### Low Risk Activities:

- Working in an office for extended periods.
- Undertaking site surveys in occupied premises.

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Responsibilities for the health and safety of lone workers are allocated as follows:

### Regional Directors / General Managers:

- Shall ensure that suitable resources are in place for the management of lone working.
- Shall ensure that locations maintain a log of employees considered to be lone workers.
- Implement procedures to escalate instances where employees do not report or return at the expected time.
- Ensure systems are in place to take action to contact / locate employees that have failed to make contact or return at the expected time.
- Monitoring feedback from the organisation on lone worker risk and seeking to improve processes.
- Monitor and update this policy as appropriate.

### LSM's/WSM's/EM's:

- Shall establish systems to identify employee likely to work alone.
- To ensure that the risks of lone working are suitably assessed and managed.
- Having assessed the risks, to decide whether lone working is reasonable or not in these situations.
- To report to the line Manager any situation where the risks cannot be controlled.
- If lone working is considered reasonable, then the manager must ensure that suitable precautions are in place, such as:
  - Mobile telephones/radios
  - Giving information on known risks
  - Relay of lone worker procedures
  - Ensuring lone worker app is installed and utilised – including escalation.

### Employees:

- Identify any activity carried out which will involve them working alone for extended periods.
- Comply with any precautionary measures including guidelines laid down such as the use of Lone Worker applications or logging in.
- Provide any of the following information that may be needed to set up a safe system of work:
  - Working alone at the beginning and end of the normal working hours
  - Detail of the make, model, colour and registration number of the vehicle being used.
  - Notifying any changes to the daily out of base work plan (i.e. ad-hoc or “spur of the moment” visits).
  - Informing key person (“buddy”) on return to base.
- Report to their managers any unsafe or potentially unsafe situations, and to report incidents using the incident report line procedure.
- Take reasonable care for their own safety and not expose themselves to unnecessary risk.
- Attend appropriate training required.

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### 3.23 Maintenance of Hire Fleet

Maintenance, including inspection, examination and repair of all machines in fleet will be carried out in accordance with company risk assessments, standard operating procedures, manufacturers and industry guidance.

Maintenance must only be undertaken by trained and competent engineers in line with the Nationwide Platforms and IPAF minimum training requirements.

Thorough examinations if completed in-house, must be completed by a certified IPAF Competent Assessed Person in line with IPAF guidelines for powered access equipment. However, the majority of thorough examinations of the hire fleet will be completed by the contracted independent third-party specialist.

### 3.24 Manual Handling

To prevent injuries and long-term ill-health from manual handling the company will ensure that operations which involve manual handling are eliminated, so far as is reasonably practicable. Where it is not practical the company will carry out a manual handling risk assessment to determine what control measures are required to reduce the risk to an acceptable level.

To implement this policy the organisation will ensure that:

- Manual handling risk assessments are carried out where relevant and records are kept.
- Employees are properly supervised.
- Adequate information and training is provided to persons carrying out manual handling activities including details of the approximate weights of loads to be handled and objects with an uneven weight distribution.
- Any injuries or incidents relating to manual handling are investigated, with remedial action taken.
- Employees adhere to safe systems of work.
- Safety arrangements for manual handling operations are monitored and reviewed.
- Where relevant, employees undertaking manual handling activities are suitably screened for reasons of health and safety, before doing the work.
- Special arrangements are made for individuals with health conditions which could be adversely affected by manual handling operations.

#### Reducing the risk of injury

In considering the most appropriate controls, an ergonomic approach to designing the manual handling operation will optimise the health, safety and productivity associated with the task.

Techniques of risk reduction will include:

- Mechanical assistance.
- Redesigning the task.
- Reducing risk factors arising from the load.
- Improvements in the work environment.
- Employee selection.

No employee will be required to lift any item that they do not feel confident of doing without risking personal injury.

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### 3.25 New and Expectant Mothers

The company recognises that the general precautions taken to protect the health and safety of the workforce as a whole may not in all cases protect new and expectant mothers and there may be occasions when, due to their condition, different and/or additional measures will be necessary.

To implement effective measures for new and expectant mothers the company will ensure that:

- Employees are instructed at induction to inform their relevant manager of their condition at the earliest possible opportunity and that the highest level of confidentiality is always maintained.
- Risk assessments are carried out for all work activities undertaken by new and expectant mothers and associated records and documentation maintained.
- Necessary control measures identified by the risk assessment are implemented, followed, monitored, reviewed and, if necessary, revised
- New and expectant mothers are informed of any risks to them and/or their child and the controls measures taken to protect them.
- Any adverse incidents are immediately reported and investigated.
- Appropriate training etc is provided where suitable alternative work is offered and accepted.
- Provision is made to support new and expectant mothers who need to take time off work for medical reasons associated with their condition.
- Where relevant a suitable rest area is provided to enable the new or expectant mother to rest in a degree of privacy and calm.
- Where risks cannot be eliminated or reduced to an acceptable level then consideration will be given to adjusting working conditions and/or hours or if necessary, providing suitable alternative work or paid absence for an agreed duration.

### 3.26 Night Working

The company will ensure, so far as is reasonably practicable, that employees who work nights are not put at any additional risk. The company will identify from risk assessment any necessary controls required for night workers.

A 'night worker' is defined as one whose daily working time includes at least three hours of night-time:

- On most days worked
- Often enough for it to be said that the night work is as a normal course.

To implement effective measures for night workers the company will ensure that:

- Risk assessments are carried out for all work activities undertaken by night workers and associated records and documentation maintained.
- Necessary control measures identified by the risk assessment are implemented, followed, monitored, reviewed and, if necessary, revised.
- Night workers are informed of any risks and the controls measures taken to protect them.
- Any adverse incidents are immediately reported and investigated.
- Health assessments are conducted prior to starting night work and are reviewed at regular intervals.
- Where an individual cannot work nights due to a health condition, other employment options or restrictions will be considered on a temporary or permanent basis where possible.
- New and expectant mothers will be assessed once notified.
- Young workers may not be legally allowed or suitable for night work, depending on the task or duration. This will be assessed prior to starting any night work.

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### Health Assessment

Those identified as night workers will be offered a Health Assessment prior to starting to work nights and at regular intervals thereafter.

The Health Assessment will consist of an initial Medical Questionnaire. Where this identifies any medical concerns then the company will review the ability to work nights with our occupational health provider.

### 3.27 Noise

The company will take all reasonable steps necessary to ensure that the risk of hearing damage to employees who work with noisy equipment or in a noisy environment is reduced to a minimum.

#### Noise Risk Assessments

The company will carry out regular noise exposure risk assessments of noisy areas, processes and/or equipment as appropriate. Assessments will be used as the basis for formulating action plans for remedial measures when necessary. Assessments will be recorded and updated regularly, particularly when changes in work practice cause changes in noise exposure levels of employees.

#### Reduction of Noise Exposure Levels

The company will, as far as is reasonably practicable, take all steps to reduce noise exposure levels of employees by means other than the use of personal protection. The company accepts that the use of ear protectors is a last resort and is committed to continuing to seek and introduce alternative methods for reducing noise exposure levels whenever possible in the future.

#### Provision of Ear Protection

The company will provide suitable and effective ear protection to employees working in high noise levels, as indicated as necessary by the results of noise exposure assessments. It will also provide for the maintenance and repair or renewal of the protective equipment, provide training in the selection and fitting of protectors and provide details of the circumstances in which they should be used.

#### Hearing Protection Zones

The company will designate hearing protection zones where required, which may include particular areas, operations or pieces of equipment. All personnel entering these zones will be required to wear hearing protection.

#### Use and Maintenance of Noise Control Equipment and Procedures

The company will maintain all equipment and monitor all procedures introduced for the purpose of reducing noise exposure of employees, including enclosures, silencers and machine covers.

All personnel will be required to:

- Use these procedures and equipment correctly.
- Promptly report any defects or deficiencies through the appropriate channels.

#### Provision of Training

The company will provide adequate training to employees as part of its hearing conservation and noise control policy.

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All employees who are subject to high levels of noise will be provided with:

- Information, instruction and training about the harmful effects of noise
- Information and training on what they must do in order to protect themselves and meet the requirements of the law and of the organisation's policy.

Where a problem arises as a result of noise in the workplace, the employee must inform their line manager or Safety Representative immediately.

### Audiometric Testing

Where employees are exposed to risk from hearing damage, the company will adopt a programme to monitor the hearing of employees subject to high levels of noise ensuring the organisation's noise control policy is effective and that employees' hearing is not being adversely affected. This will involve regular audiometric tests carried out by properly trained personnel and pre-employment audiometric tests for new employees.

### 3.28 Permits to Work

Non-routine work, such as maintenance, cleaning, equipment installation and refurbishment, other than the hire fleet, can produce health and safety risks over and above those normally encountered in our day-to-day activities. Permits to work are designed to check that all eventualities have been considered when planning and organising this type of work and are an important means of minimising any risks involved.

Employees, contractors and visitors are all expected to comply with the requirements of any permits that are in force and must refer to the **Permit to Work procedure**.

Employees working off site, i.e., on another organisation's premises, are expected to abide by all permits to work operated on that site.

Should employees experience any problems with the operation of permit-to-work systems, they should immediately inform a responsible person (usually a manager or supervisor) so the organisation can investigate and rectify the situation.

Permits to work exist to cover tasks carried out under certain circumstances and over limited time periods. They will therefore be displayed while the work specified is under way but will cease to operate when the tasks have been completed.

### Information and Training

The company will provide the necessary information and appropriate training to ensure that appropriate employees, supervisors, contractors and visitors are fully aware of the permits in use and are competent to undertake the tasks and tests prescribed in the permits.

### 3.29 Personal Protective Equipment

The company provides personal protective equipment (PPE) when the risk presented by a work activity cannot be eliminated or adequately controlled by other means. When it is provided, it is because health and safety hazards have been identified that require the use of PPE and it is therefore necessary to use it in order to reduce risks to a minimum.

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To effectively implement its arrangements for the use of PPE the company will:

- Ensure that PPE requirements are identified when carrying out risk assessments.
- Use the most effective means of controlling risks without the need for PPE whenever possible and only provide PPE where it is necessary.
- Carry out an assessment to identify suitable PPE.
- Ensure that if two (or more) items of PPE are used simultaneously, they are compatible and are as effective used together as they are separately.
- Ensure that PPE is sourced appropriately and bears the “CE” or “UKCA” certification mark.
- Ensure PPE is available to all staff who need to use it.
- Provide adequate accommodation for correct storage of PPE.
- Provide adequate maintenance, cleaning and repair of PPE.
- Inform staff of the risks their work involves and why PPE is required.
- Instruct and train staff in the safe use and maintenance of PPE.
- Make arrangements for replacing worn or defective PPE.
- Review assessments and reassess the need for PPE and its suitability whenever there are significant changes or at least annually.

Employees provided with PPE for their own personal use at work will be required to sign to confirm its receipt, and line manager’s will be required to inspect employees PPE on a 6 monthly basis.

### 3.30 Pressure Systems

Due to the high pressures at which they operate pressure systems are subject to numerous legal requirements. Pressure systems include a mechanism for regulating internal pressure. Severe corrosion and/or failure of pressure-regulating system and other safety valves could lead to an explosion.

The company will ensure that all pressure vessels and pressurised equipment used by the company meet the requirements of the Pressure Systems Safety Regulations 2000 and the Pressure Equipment Regulations 1999.

To ensure the safety and mechanical integrity of the pressure systems used and to meet the requirements of the legislation the company will:

- Ensure that the equipment is thoroughly examined by a competent person before it is put into service.
- Ensure that the equipment is of sound construction, suitable quality, made from suitable materials and free from any obvious defects before it becomes operational.
- Ensure that each item of equipment is clearly and uniquely marked so that it can be readily identified.
- Establish the safe operating limits of the equipment and display them on the equipment, and not allow the equipment to exceed those limits except where tests carried out by a competent specialist require it.
- Provide adequate training and instructions to ensure the equipment is operated safely, including instructions for procedures to be followed in case of emergency.
- Fit and calibrate suitable protective and warning devices to the equipment to deal with emergencies or mechanical malfunctions and ensure that any devices such as safety valves or bursting discs will be able to discharge safely.
- Ensure that the equipment is properly maintained.

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- Have a suitable written scheme drawn up or certified by a competent person for the examination, at appropriate and regular intervals, of the equipment.
- Arrange to have examinations carried out by a competent person at the intervals set down in the scheme and whenever the equipment is transferred to a new location.
- Keep adequate records of the most recent examination.
- Ensure that equipment identified as being in need of repairs is not used until repairs are carried out and, wherever possible, depressurise the equipment before the repair work begins.
- Pass all pertinent records on to the new owner if we choose to dispose of the pressure equipment and ensure that we receive written confirmation of the transfer of records.

The examination normally takes place each year or as prescribed by the manufacturer.

Records of examinations are kept in the Safety File and a copy of the last inspection must be taken with the equipment when it is transferred to a new location.

### 3.31 Risk Assessment and Safe System of Work

Risk assessment is a systematic examination of what within our business can cause harm to people and it helps us determine whether we are doing enough, or further actions are required to reduce the likelihood of injury or ill health.

Detailed specific risk assessments that also act as safe systems of work will be carried out as determined by risk review workshops and tasks to be undertaken to address those premises, equipment, people or activities to comply with specific legislation or to proactively manage health and safety risks.

We will ensure that:

- Assessments are carried out and records are kept.
- Control measures introduced as a result of assessments are implemented and followed.
- Employees are informed of the relevant results and provided with necessary training.
- Any injuries or incidents lead to a review of relevant assessments.
- Assessments are regularly monitored and reviewed.
- Suitable information, instruction and training will be provided to all persons involved in the risk assessment process.

We may be controlling risks in various ways, determining the effectiveness of those controls is part of our risk assessment process.

More information can be found in relation to the risk assessment and safe system of work process in the **Risk Assessment and Safe System of Work Procedure**.

### 3.32 Temporary Employees

The company will take the necessary measures to ensure the health and safety of any temporary and casual staff in its employment.

To achieve this, the company will provide temporary employees with the following information prior to starting work:

- Details of the qualifications and skills are required to do the work safely.
- The health surveillance to be provided under statutory provisions.

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- Any risks to health and safety identified by workplace risk assessments.
- The preventive measures to be taken.
- Safe working procedures.
- The action to be taken in the event of an emergency.

The competence of temporary workers will be assessed to ensure they are capable of working safely.

### 3.33 Training

Training in health and safety is a legal requirement and helps create competent employees at all levels within the company to enable them to make a far more effective contribution to health and safety, whether as individuals, teams or groups.

Competence of individuals through training helps individuals acquire the necessary skills, knowledge and attitude which will be promoted by managers and supervisors throughout the organisation.

Our training objectives will cover three areas, that of the organisation, the job and individuals. All employees will need to know about:

- The QHSE policy
- The structure and system for delivering this policy.

Employees will need to know which parts of the system are relevant to them, to understand the major risks in our activities and how they are controlled. All employees will be provided with the details of this during their first week induction and direct to the appropriate locations to find required information by their line manager.

Managers and supervisors training needs will include:

- Leadership and communication skills
- Safety management techniques
- Skills on training and instruction
- Risk assessment
- Health and safety legislation
- Knowledge of our planning, measuring, review and audit arrangements.

All our employees training needs will include:

- Relevant health and safety hazards and risk
- The health and safety arrangements relevant to them
- Communication lines to enable problem solving.
- Reporting of incidents or near misses

All employees will receive **induction training**. Such training will cover:

Fire procedures, warning systems, actions to be taken on receiving warning, locations of exits/escape routes, evacuation and assembly procedures, first aid/injury reporting procedures, names of first aiders/appointed persons, instruction on any prohibition areas (i.e. no smoking), issue of protective clothing/equipment and its use, instruction under COSHH, mandatory protection areas, thorough instruction applicable to their particular duties at work etc.

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Training needs will be reviewed as a result of job changes, promotion, new activities or new technology, following an accident/incident and performance appraisal.

Records of training will be kept for all employees.

Employees must:

- Participate in the induction training activities they have been required to attend or carry out.
- Work according to the contents of any training they receive.
- Ask for clarification of any points they do not fully understand.
- Not operate hazardous plant or equipment, use hazardous chemicals or carry out any hazardous activity unless they have been appropriately trained and instructed.

### 3.34 Vibration

Regular exposure to continuous vibration from a work process has the potential to cause long term ill health including a range of occupational diseases collectively known as hand-arm vibration syndrome (HAVS) or whole-body vibration (WBV).

To minimise the risk from vibration the company will:

- Assess the risks to health from exposure to continuous levels of vibration and determine the control measures needed.
- Introduce effective control measures to ensure levels of exposure to hand-arm vibration and whole-body vibration is eliminated or reduced as far as is reasonably practicable.
- Record the assessments and review them periodically or when changes occur.
- Ensure that the most appropriate equipment is used for the job, that the equipment is sourced from appropriate suppliers and that it bears the “CE” or “UKCA” certification mark.
- Ensure that those persons responsible for managing work likely to result in exposure to hand arm vibration and whole-body vibration are adequately trained and competent.
- Inform, instruct and train employees about the risks and the precautions to be taken to protect themselves from the harmful effects of continuous exposure to vibration.
- Ensure no new equipment or processes are introduced into the work activities where there is a foreseeable risk of hand-arm or whole-body vibration without a risk assessment and approval of a designated manager.
- Maintain an inventory of all vibration equipment used that is likely to cause hand-arm vibration and whole-body vibration.
- Monitor exposure of hand-arm vibration and whole-body vibration and undertake appropriate health surveillance, where necessary.
- Maintain tools to the manufacturer’s specifications to avoid worsening vibration.

### 3.35 Violence

The company recognises that in certain situations violent behaviour towards staff may occur and therefore will take all reasonable measures to protect staff from violence and aggression. We define violence and aggression as:

- Actual or threatened physical assaults on staff.
- Psychological abuse of staff.
- Verbal abuse which includes shouting, swearing and gestures.
- Threats against employees.

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To achieve this objective, we will:

- Carry out risk assessments of potential conflict situations to determine the control measures necessary to protect staff.
- Ensure that premises are kept secure.
- Inform all employees of the procedure following a violent or challenging behaviour incident.
- Not tolerate violence or challenging behaviour towards our employees.
- Train our employees who may be exposed to violence or challenging behaviour situations.
- Support the employees involved in any incident.
- Support their decisions regarding the pressing of criminal charges.
- Provide any counselling or post-incident assistance required by the employees.
- Keep records of all incidents of violence and aggression and review the control measures with a view to continual improvement in employee safety.

### 3.36 Visitors

In the interest of safety and security, the company will take the necessary measures to protect staff and visitors from any accidents or incidents that may occur during visiting.

Employees hosting visitors must ensure that:

- They are authorised to enter the premises or accompanied.
- They adhere to applicable health and safety instructions and rules during their visit.
- Adequate information is passed to ensure their safety including emergency information by means of a location induction and the visitor being briefed on the Visitors and Contractors Rules.
- Any protective clothing required is provided and worn.
- Any accidents / incidents involving visitors are reported through the Aim Line.

Employees aware of people on the premises who may be unauthorised should report these to their manager for action.

#### Emergency Action

In the event of the fire alarm sounding, all visitors should be escorted to the assembly point by their host. Visitors should not leave the area before notifying the senior person present.

### 3.37 Waste Management

The business will ensure that a waste management partner is engaged nationally to ensure that all waste is processed in the appropriate manner. Particularly in our depot locations where we not only have general waste and recycling but additional waste streams including hazardous waste.

The company will adhere to the following hierarchy for processing of waste materials:

- Re-use (on or off site)
- Recycle (on or off site)
- Send off site for recovery.
- Send for incineration and a last resort send to land fill.

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We will ensure that through regular inspection and monitoring the appropriate waste receptacles are in place at each location to maximise the potential for recycling and reuse.

### 3.38 Work at Height

The company will take all reasonable steps to provide a safe working environment for all employees who may be affected by work at height activities.

The company will ensure that:

- All work activities that involve work at height are identified and assessed.
- The need to undertake work at height will be eliminated whenever it is reasonably practicable to do so.
- Adequate and secure working platforms with guard rails and toe boards will be used in preference to ladders which will be used for light, short duration work only and secured to prevent displacement. Where possible, powered access equipment will be the preferred mode of working at height.
- Scaffold and scaffold towers will only be used if necessary due to the nature of the work of the organisation.
- Roof lights and other fragile surfaces will be protected to prevent falls.
- Fall arrest equipment will be used if other means of prevention (safety nets, harnesses with running lines, etc.) are not practical or justified.
- Risks associated with those activities where work at height cannot be eliminated are evaluated and steps are taken to control them.
- All the necessary equipment to allow safe access to and egress from the place of work is provided.
- All the necessary equipment to ensure adequate lighting and protection from adverse weather conditions is provided.
- Suitable plant is provided to enable the materials used or created in the course of the work are safely lifted to and from the workplace and stored there if necessary.
- Any working platform and its supporting structures are selected and/or designed in accordance with current standards.
- Regular inspections of all equipment required for working at height are undertaken.
- competent persons are appointed to be responsible for the supervision of all work at Height and associated activities.
- Any contractors from whom they procure services comply with this policy.

#### Information and Training

The company shall provide any information, instruction and training required to work in a safe manner when working at height to its employees. Contractors are required to demonstrate competence and or certification before undertaking any task.

### 3.39 Work Equipment

The company will provide a safe working environment in relation to work equipment safety and ensure all employees receive appropriate safety information and training in their work equipment.

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To achieve this objective the company will:

- Provide work equipment that is suitable for the purpose and compliant with the requirements of the Provision and Use of Work Equipment Regulations.
- Retain and make available the manufacturer's instruction manual for each item of equipment, where relevant.
- Before using any item of work equipment, ensure that a risk assessment is carried out and brought to the attention of relevant employees.
- Inspect all equipment at installation and prior to first use.
- Regularly inspect work equipment in accordance with the manufacturer's recommendations and company policy.
- Maintain work equipment in accordance with the manufacturer's recommendations.
- Keep records of all inspections and maintenance.
- Provide adequate instruction, information and training to employees to enable the work equipment to be used and maintained safely.
- Provide refresher training as appropriate and as determined necessary by workplace inspections.

### 3.40 Working Time Directive

The company will ensure that all workers under their control adhere to the working time regulations.

The working time regulations are designed to limit the number of hours individuals must work. The company will NOT encourage workers to work over the 48 hours, but workers can choose to work longer hours if they wish by opting out. Workers cannot be forced to opt out and can revoke their opt out, if they give a suitable notice period.

Individuals who are tired due to working excessive hours are more likely to suffer from mental health problems, general ill health and make mistakes leading to accidents.

A summary of the requirements for adult workers:

- A maximum of 48 hours per week, averaged out over a 17-week reference period (employees can opt out of this).
- Entitlement to a minimum uninterrupted rest period of 11 hours in every 24-hour period with no opt out.
- Entitlement to 28 days paid holiday per year (including statutory holidays) for full time workers (pro-rata for part time workers).
- Free health assessments for night shift workers.
- 24-hour rest period at least once a week, can be 48 hours every fortnight with no opt out.
- Entitlement to a rest break, if working over six hours.
- Employees must not suffer any detriment if they choose not to opt out.

Travelling to and from the normal workplace, break periods, rest periods, holidays and sickness do not count as working time.

The reference period of 17 weeks can be increased 26 weeks or 52 weeks by local collective agreements with recognised trade unions or official employee representatives.

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A young person's maximum hours are limited to 40 hours per week with no reference period. Young persons are generally excluded from shift working.

### 3.41 Workplace Transport

The company will take all reasonable steps to control the risks associated with vehicles operating on its premises to ensure a safe site, safe vehicles and safe drivers.

#### Traffic routes

The company will provide safe traffic routes that:

- Are suitable in design for the people and vehicles that use them.
- Allow people and vehicles to move around safely and not cause danger to others working near the traffic route.
- Are well-drained and free of obstructions and slip/trip hazards.
- Avoid steep slopes and sharp or blind bends where possible and use appropriate measures to increase visibility where they are unavoidable.
- Are of suitable construction to provide adequate grip and to be able to bear the loads that will pass along the route.
- Avoid passing close to:
  - Any obstruction that could collapse or be left in a dangerous state if struck (such as racking) unless it is fenced off or adequately protected against being struck.
  - Any potentially dangerous items such as chemical storage, fuel tanks or pipes unless they are well protected.
- Be adequately lit.
- Avoid slopes and uneven or slippery surfaces, and erect barriers to prevent vehicles from entering hazardous terrain (such as pits) to reduce the risk of vehicles overturning.

The company will ensure that all vehicles adhere to the speed limits when in the depot environment.

Where reasonably practicable, all new traffic routes will be wide enough to allow pedestrians and vehicles to circulate freely. The company will also ensure that all existing traffic routes which do not allow pedestrians and vehicles to circulate freely will include measures such as marked pedestrian crossings, where reasonably practicable. One-way systems will be clearly marked and flow clockwise wherever possible, as that is the direction that most drivers will expect.

Signage and signals will be provided wherever necessary to ensure that pedestrians and vehicle operators are warned of hazards before they encounter them and at the hazard itself.

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### Traffic segregation

The company will keep vehicles and pedestrians separated on traffic routes wherever possible and will provide pedestrian crossings where pedestrian and vehicle traffic routes cross each other. Pedestrians will be prevented from entering areas where vehicles operate unless they are required to do so as part of their job role. Vehicles and pedestrians must always keep to their segregated areas when sharing traffic routes **OR** Vehicles and pedestrians will be kept separated by visual and or physical barriers when using traffic routes.

### Reversing

The company will seek to eliminate reversing where possible. Where this is not possible, the company will implement, where reasonably practicable, the following measures:

- Establish clearly marked dedicated reversing areas that are visible to drivers and pedestrians.
- Where possible, enlarge reversing areas to improve visibility for drivers and pedestrians.
- Prevent non-essential personnel from entering reversing areas.
- Fit fixed mirrors and other visibility aids to increase visibility around vehicles.
- Install reversing aids on vehicles where possible.
- Use a trained banksman or signaller only where all other options have been exhausted.

Where vehicles must reverse up to structures or edges, the company will consider the provision of wheel stops or similar structures. If banksmen must be used, they will use standard European hand signals and any new signals that must be devised will be based on existing signalling practice. Banksmen and drivers must agree on the signals to be used before any manoeuvring takes place.

### Parking

The company will provide safe and suitable parking areas for work-related vehicles, which will be separated from those of private vehicles wherever possible. Parking areas will:

- Be clearly signposted.
- Not impede traffic routes, and keep pedestrians and vehicles separated wherever possible.
- Allow drivers and pedestrians to see clearly.
- Be firm, level and well drained and, if possible, well lit.
- Be as close as possible to the intended destination of drivers and passengers.

All vehicles must be reversed into car parking spaces to ensure that vehicles can be driven out, allowing for greater visibility. No vehicle should be left unattended unless the parking brake has been applied, the engine has been switched off, the starter key has been removed from the ignition and any mounted equipment has been lowered to the ground or secured.

Vehicles will not be permitted to park in no parking areas or where they will obstruct any entrance, exit door or emergency escape route.

### Loading and unloading

Loading and unloading of vehicles is to be undertaken in compliance with the company's **load and unload code of practice** and associated risk assessments.

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### Company Vehicles

All vehicles provided by the company will meet all the relevant safety requirements specified for that type of vehicle. When a vehicle is found to be sub-standard it will be immediately taken out of service until the fault can be rectified. Vehicles will be regularly inspected, and the manufacturer's guidelines will be followed when devising regular maintenance schedules and the content of the inspections. Where vehicles are allocated to individuals it is the responsibility of the individual to ensure that this happens.

### Drivers

All drivers for company vehicles will be checked and assessed as competent before they may use any workplace vehicles. Where drivers will be operating company vehicles purely within the confines of the workplace, they will still be assessed to the standards necessary to drive on the public road.

Drivers of vehicles with specialised attachments or carrying out tasks outside of the normal scope of driving on the public road (such as loading and unloading) will be trained specifically for those tasks and equipment and must be authorised to use them.

Competent drivers will:

- Be capable to operate the vehicle and any associated equipment safely.
- Receive comprehensive instruction and training for operating that vehicle.
- Have a suitable level of fitness and a mature and responsible attitude.

The fitness levels of drivers will be considered when assigning drivers to vehicles. Reassessment and refresher training will be used to ensure that all drivers remain competent.

### 3.42 Young Persons

Whilst precautions taken to protect the health and safety of the workforce as a whole will, in many cases, also protect young persons, there are occasions when different and/or additional measures will be necessary due to their lack of experience, knowledge or absence of awareness of potential risks. A 'young person' is defined as one who is below the age of 18 years.

To ensure the safety of young persons the organisation will:

- Carry out risk assessments to cover the activities of young persons.
- Implement the actions determined by the risk assessment process.
- Inform the young persons of any risks associated with their work and the control measures taken to protect them.
- Provide a copy of the risk assessment to the parent/guardian of any young person below the school leaving age.
- Provide additional appropriate information, instruction, supervision and training, etc as determined by the risk assessment.

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### Related Documents

Title	Reference	Version
The Health and Safety at Work etc. Act 1974	HSAWA	1974
Management of Health & Safety at Work Regulations 1999	MHSWR	1999
Health & Safety (Consultation with Employees) Regulations 1996	HSCER	1996
Environmental Protection Act 1990	EPA	1990
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations	RIDDOR	2013

### Revision history

Version	Date	Author	Description of changes
2.0	07.07.2020	QHSE	Review and add related documents
3.0	12.11.2020	QHSE	Change of MD
4.0	02.03.2021	HSE	Review and alignment of wording around health, changes in job titles, etc.
5.0	21.02.2022	HSE	Annual review and change from Regional to Business Director
6.0	13.02.2023	HSE	Addition of arrangement section, change of various job titles and review of policy section.
7.0	01.02.2024	HSE	Annual review minor amendments, change of various job titles and review of policy section. Document renumbered from NWP-08-07-0004-v7.0-EN
8.0	06.02.2025	HSE	Annual review minor amendments, change of various job titles and review of policy section. Document renumbered from NWP-08-07-0004-v8.0-EN

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