

MANAGING DIRECTORS FOREWORD TO SAFETY POLICY

The Directors of Berkeley Construction (Thanet) Limited acknowledge their responsibility for the implementation of this Health and Safety Policy.

- It is the aim of the Directors, as far as is reasonably practicable to achieve the following objectives:
- To create as far as is reasonably practicable an accident free working environment for all persons.
- To design and implement safe practices which will benefit all persons wherever their working environment.
- To investigate all serious accidents, as defined in the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995, to any person without delay and always within twenty four hours of notification and all other accidents/incidents within ten days where considered appropriate.
- To provide Health and Safety training to all staff on a programmed basis and in accordance with the Training Policy set out in the Safety Policy.
- To provide instruction and information to all persons working within the Company as regularly as is necessary and always in relation to new legislation as soon as possible after its implementation.
- To carry out Risk Assessments of all work tasks as required by the Management of Health and Safety at Work Regulations 1999 and to ensure these are communicated to staff as appropriate.
- To monitor the effectiveness of the Safety Policy throughout its activities in accordance with the Safety Policy.
- To ensure that adequate financial provision is made by the Company to address issues relative to Health and Safety.

SAFETY POLICY STATEMENT

It is the policy of the Company to carry out its activities at all times in such a manner as to ensure, so far as is reasonably practicable, the health, safety and welfare of all its employees and to ensure so far as reasonably practicable that it conducts its undertaking in such a way that persons other than employees who may be affected by its work activities are not exposed to risks to their Health and Safety.

In particular the Company recognises its duties, so far as is reasonably practicable to ensure:

- a. that plant, equipment and systems of work are safe and without risk to health.
- b. the safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances.
- c. that adequate information, instruction, training and supervision in Health and Safety matters is provided.
- d. the maintenance of a safe and healthy place of work, and the provision and maintenance of safe access and egress to all work area.
- e. the provision and maintenance of a safe and healthy working environment, and adequate arrangements for welfare.

It is the duty of Company Management to see that everything reasonably practicable is done to prevent personal injury, and to maintain a safe and healthy place or work and to specifically:

- Assess all work activities of employees for any perceived risks to health, or safety.
- Keep informed of technical developments and advances relevant to the Company's activities in order to improve Health and Safety at Work.
- Keep appraised of changes in legislation and approved codes of practices in order to achieve compliance with the law, and to co-operate fully with appropriate enforcing authorities, in this respect.
- Secure the co-operation and involvement of Company employees in achieving safe working.

Employees are reminded of the requirements to ensure that Company Policy is observed. In particular:

- a. to take reasonable care of their own Health and Safety at work and of those who may be affected by their own actions or neglect.
- b. to co-operate with the employer to ensure that any duty or requirement for Health and Safety imposed on the employer is performed or complied with.
- c. not to intentionally or recklessly interfere with or misuse anything provided in the interest of health, safety and welfare.
- d. to report any shortcomings perceived by them in this policy, or in a Safe System of Work, which they are required to obey.

Prime responsibility for Health and Safety rests with the Managing Directors who have direct concern for this policy and accords Health and Safety matters equal priority to other Management functions within the company.

The Managing Directors expect the Company Management to accord the same level of priority to Health and Safety matters, and requires all employees to ensure that this policy is observed.

Company Management will monitor the operation of this Policy and recommend alterations and/or sampling, in addition to investigation of any reports from employees as a result of d. above.

This policy should be read in conjunction with the separate sections on “Responsibilities”, “Arrangements” and also, with Codes of practice/Safe Working Procedures applicable to the company’s activities.

This Health, and Safety Policy will be reviewed periodically, and revised as, or whenever, changing circumstances dictate.

Signed Dated:
Managing Director
Berkeley Construction (Thanet) Limited

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RESPONSIBILITIES FOR HEALTH AND SAFETY

a) Berkeley Construction (Thanet) Limited Limited

The joint Managing Directors of Berkeley Construction (Thanet) Limited Ltd have overall responsibility for the implementation of this policy throughout all the subsidiary companies.

Day to day responsibility for ensuring compliance with the overall objectives of this Safety Policy have been delegated to Senior managers within the subsidiary companies.

b) Active Signs Limited

i) The Production Director has overall responsibility for Health and Safety within the Company's manufacturing units, namely those based at Ramsgate and Minster.

The Production Director is specifically responsible for ensuring that the following Health and Safety principles are met:

1. Systems of work are in place within the manufacturing units which are safe and without risks to the health, safety and welfare of employees.
2. Plant and equipment is purchased, installed and maintained in accordance with the relevant statutory provisions eg. Provision and use of Work Equipment Regulations 1998.
3. All employees receive appropriate information, instruction and training on all work activities, machinery and equipment etc.
4. Emergency procedures are prepared, implemented and reviewed in respect of the following:
 - Fire
 - Major chemical spillages, toxic releases
 - Building Collapse, explosion etc
 - Environmental disasters
5. Employees are regularly consulted on Health and Safety issues either individually or through a formal committee process. Union Safety Representatives will be recognised as providing essential Health and Safety support.

6. Risk Assessments and Method Statements are produced for all relevant work activities, are regularly reviewed and updated and are brought to the attention of all employees so that they have information regarding agreed safe systems of work etc.
7. Accidents, incidents and all “near miss” incidents are recorded, investigated and actioned so that a pro-active approach to Health and Safety management is adopted throughout the Company.
8. Adequate financial resources will be provided within the manufacturing operations to ensure that Health and Safety matters are addressed appropriately.
9. Advice from competent persons will be sought whenever applicable in relation to Health and Safety matters and that the Company will utilise external competent advice until such time as it determines that it has adequate resources in-house.
10. A Health and Safety Management system operates throughout the organisation which constantly addresses the key principals of management, namely:

The Production Director may delegate the implementation and day to day responsibility for Health and Safety to Senior Managers as he deems appropriate eg to the Works Manager..

- ii) The specific responsibilities for Health and Safety for the Works Manager are as follows:
 - a. carrying out inspections of plant, machinery and equipment and ensuring it is correctly maintained in accordance with the relevant Code of Practice.
 - b. inspecting the work area for which they are organisationally responsible to ensure safe working procedures are being carried out by employees under their control.
 - c. ensuring new employees are competently trained in the use of equipment, are conversant with the safety policy, Codes of Practices and/or Safe Working Procedures applicable to the work they are required to do.
 - d. Ensuring that existing employees are fully conversant with the Safety Policy, Codes of Practice and/or Safe Working procedures applicable to the work in hand and that if necessary they are suitably re-trained in these respects.

- e. Ensuring all work activities are assessed on a personal task basis and, where deemed necessary, ensuring health surveillance is maintained and recorded. Assessments will include a “considered” date when the risk will be reassessed, if changes in activities have not called for a reassessment prior to that date.
- f. Ensuring that, as applicable, protective equipment is supplied, correctly used and maintained.
- g. Ensuring that records are kept up to date for all the sections a to f above. Records of health assessments, see e above, are to be kept for 40 years.
- h. Ensuring that employees under their control work strictly in accordance with Codes of Practice and/or Safe Working Procedures applicable to the work in hand.
- i. Investigating and reporting, or correcting, as appropriate any hazard or potentially hazardous situation reported to them by an employee working under their control.
- j. Investigating incident that might occur, whether or not an injury results. In any such case they will immediately report such occurrences to the Directors.
- k. Ensuring employees are given a copy of the risk assessment for the task they are asked to carry out.

Employees are responsible to the Directors to take reasonable care for their own Health and Safety and that of others who may be affected by their actions. They must also co-operate with the Company as far as it is necessary to enable it to discharge any statutory duty or requirement placed on it by the Health and Safety at Work etc. Act 1974, and the management of Health and Safety at Work Regulations 1999.

Employees must work to the principles of this Safety Policy, Codes of Practice and/or Safe Working procedures applicable to the work in hand. Employees should also be aware that it is an offence punishable at law to interfere with or ‘misuse’ anything provided in the interest of Health and Safety according to legal requirements. (the word ‘misuse’ has been interpreted in case law as including ‘failing or refusing to use’. In respect of protective equipment).

iii) Contracts Manager IS responsible for the following matters in respect of Health and Safety:

- Ensuring that all new contracts have due regard to Health and Safety matters and that safe systems of work etc are considered during the planning and installation of new signs to premises etc.
- Adequate financial resources are allowed for in any contract negotiation for ensuring compliance with Health and Safety legislation.
- Carrying out preliminary Risk Assessments in respect of installation activities on site.
- Ensuring that any responsibilities they may have in respect of the Construction (Design and Management) Regulations 1994 when operating on a Clients premises or on a construction site.

iv) Employees are responsible for ensuring the following in respect of health and safety:-

- Reporting and recording any accident or dangerous Reading and understanding the Company's Safety Policy thus ensuring that its provisions are being adopted in all working environments.
- Reporting any defective equipment or machinery or any defective area of the premises to the Manager as quickly as possible.
- Adopting a safe system of work at all times, using all safety clothing and equipment which is provided and generally taking responsibility for their own safety.
- Working in a safe condition so that their own safety and that of fellow employees or members of the public are not jeopardised, including ensuring they are fully familiarised with all activities before undertaking them and actively seeking guidance and/or instruction where not.
- Ensuring that all accidents are reported to the Manager in accordance with the Company's procedure.
- Keeping all work locations free from obstructions, refuse accumulations etc.

v) In addition to the foregoing persons working in the company's premises are responsible for the following:-

- Ensuring that the fire exit routes, fire prevention equipment, fire extinguishers are not obstructed, tampered with or abused and are used for the purposes for which they were designed.
- All staff are responsible for reporting to the Manager or his/her Assistant any matter in relation to fire procedures and evacuation procedures.

WORK ON PREMISES AS A CONTRACTOR

The Company does work away from its base and accepts that in all cases where work is being carried out on premises not owned or occupied by the company that notwithstanding any of the foregoing there is an overall requirement to work to the requirements of the Health and Safety Policy, Codes of Practice, Safe Working Procedures and/or Permits to Work of the owner, or occupier, of such premises in addition to the minimum standards of this policy.]

COMPETENT PERSONS

The Management of Health and Safety at Work Regulations 1999 requires every employer to appoint a competent person to assist with the tasks and responsibilities of Health and Safety.

Berkeley Construction (Thanet) Limited Ltd have appointed an Health & Safety Consultancy as their 'Competent Person' for Health and Safety related issues until such times as they have adequate in-house resources.

The external Consultants will advise Directors on all Health and Safety matters and will ensure that they are kept briefed regarding new legislation, codes of practice etc.

All Directors and Senior managers can contact the Consultants to obtain advise and information on Health and Safety matters.

The Consultants will, undertake to review the Safety Policy, Risk Assessments and Work Procedures within the organisation at least annually, consulting with Managers and employees appropriate.

The Consultants will assist the Safety Training and any other Health and Safety matter at the direction of the appropriate Director or as directed in any agreed procedure laid down in the Safety Policy.

Applicable Legislation

Management of Health and Safety at Work Regulations 1999

MONITORING AND REVIEW OF THE COMPANY SAFETY POLICY

All persons will be expected to bring to the notice of their immediate Manager, any area where the Company's Policy on Health and Safety and welfare is or appears to be inadequate.

Berkeley Construction (Thanet) Limited Ltd have appointed a Consultancy to review and audit all practices in conjunction with Directors and employees as appropriate on a regular basis so as to identify any shortcomings in procedures etc. they will be responsible for recommending changes in procedures, updating information etc and bringing to the attention of the individual Business Director any shortcomings noted etc.

All matters raised during internal monitoring of Health and Safety issues will be raised with the appropriate responsible person and action will be taken to improve, change or replace procedures, practices etc.

Health and Safety issues will be communicated to all staff by way of internal memos and information from the Senior Manager, guidance notes, notices etc. These are to be retained as necessary by Managers and staff members. A copy of the information will be displayed on the staff notice board where it will be available for all staff at all times.

All persons who intentionally ignore Health and Safety guidance and information may be considered to be in breach of contract and disciplinary action may be instigated.

At regular intervals, a meeting will take place between the Managing Directors and the external advisors as appropriate in order to discuss the performance of the Company, its employees and its contractors in relation to Health and Safety at Work.

Applicable Legislation

Management of Health and Safety at Work Regulations 1999

TRAINING IN HEALTH AND SAFETY

Berkeley Construction (Thanet) Limited Ltd undertake to train all their employees (and all other persons as appropriate) in all areas of Health and Safety relative to their normal day to day operation within the Company.

Training will be organised where possible in-house and will be available to all staff according to any training needs analysis carried out. Specific training courses may be required for some staff members and these will be made available as required.

A record will be kept of all training courses undertaken by employees.

An updating and re-training programme will be initiated as appropriate so as to ensure that “skill decay” is minimised and to ensure that all staff are kept informed of current legislation, good practice etc.

Training may be undertaken on a “cascade” basis especially where ‘on the job’ skills are relevant. All trainers will be assessed and trained to ensure that they have appropriate training skills.

Detailed information and guidance on subjects which require training are contained in the Safety Policy.

Senior Managers are responsible for ensuring that all employees receive appropriate training and that the Training Policy is adhered to.

Applicable Legislation

Health and Safety at Work Etc Act 1974

Management of Health and Safety at Work Regulations 1999

CONSULTATION WITH EMPLOYEES

The Health and Safety (Consultation with Employees) Regulations 1996 require that an employer consults with employees, in good time in matters relating to Health and Safety at work, in particular with regard to:-

Introduction of any measure at the workplace which may substantially affect the Health and Safety of those employees.

Arrangements for nominating “competent persons” in accordance with the Management Regulations to assist the employer on Health and Safety matters, and to take charge of measures to combat identified serious and imminent danger at the workplace.

Any statutory Health and Safety information which he has to provide.

Planning and organisation of any Health and Safety training he has to provide, and

Health and Safety consequences for those employees of the introduction of new technologies into the workplace.

It is the policy of Active Signs Group Ltd in the absence of recognised representation by Safety representatives, to consult directly with the individual in respect of such issues although this method of consultation with remain under review.

Applicable Legislation

Management of Health and Safety at Work Regulations 1999

Health and Safety (Consultation with Employees) Regulations 1996