
Health and Safety Policy

1. POLICY MANUAL INTRODUCTION

Comyn Ching & Co (Solray) Ltd is situated at Phoenix Way, Garngoch Industrial Estate, Swansea, SA4 9WF and is a manufacturer and installer of radiant heating panels.

This manual provides details of the system that has been adopted by Comyn Ching Solray to control health and safety as far as reasonably practicable.

To allow Comyn Ching Solray to maintain a recognised Occupational Health and Safety System, it has adopted the principles of OHSAS 18001 Occupational Health and Safety Management System Specification as its minimum internal standard.

This specification provides the overview of the management systems relevant to Comyn Ching Solray along with the responsibilities incumbent upon members of staff for ensuring continuing system compliance.

2. HEALTH AND SAFETY POLICY STATEMENT

Comyn Ching & Co (Solray) Ltd recognise that it has a responsibility as an employer to ensure the “Health, Safety and Welfare” of all employees whilst at work. Additionally, it is the responsibility of all persons who work for Comyn Ching Solray (Directors, managers, Employees, etc) to ensure this policy extends to all other persons so they are not adversely affected by our current work activities. In this way, each and every individual within the organisation has a vital and specific role in maintaining health and safety standards.

Responsibility for the overall implementation, maintenance and development of our safety management system however rests with the senior management of Comyn Ching Solray, including the regular setting and reviewing of objectives, and the provision of adequate resources to allow those objectives to be achieved.

It is also the responsibility of senior management within Comyn Ching Solray to ensure that our health and safety policy is relevant to all applicable legislation and any other requirements that may apply.

Management recognise the importance of its staff and encourage the reporting of any hazard or risk that may adversely affect our health and safety standard; we also recognise the importance of ensuring that staff are adequately trained, informed and supervised to fulfil their activities in a safe manner.

Comyn Ching Solray is committed to a management system that demonstrates a pro-active approach through the continual improvement of our health and safety performance. This is further achieved by the regular setting and reviewing of objectives to achieve compliance to current safety legislation applicable to the company, and through matching our industry’s best practices.

We as an organisation also recognise the need for the identification of hazards and the recording and reviewing of risk assessments, to further achieve a pro-active safety management system.

The effectiveness of our health and safety policy and its implementation are subject to regular management review and all related processes and procedures are subject to an audit schedule.

3. PLANNING

(a) Planning for Hazard Identification, Risk Assessment and Risk Control

In ensuring that sufficient resources are made available for the safety system to be fully effective, it is the aim of this Organisation to first identify the extent of the risks that are posed by routine and non-routine activities undertaken as part of our own work processes.

The basis for identifying these risks within Comyn Ching Solray is the process of hazard identification, risk assessment and risk control.

Reviews of the risk assessment / risk control process will be completed on an annual basis unless there is a change in the activities, equipment or fabric of the building, which demand that an interim or new assessment is to be completed.

The results of all risk assessments will be entered onto the relevant risk assessment forms, and any remedial actions highlighted as part of the assessment are entered onto an objectives plan; this plan then forms part of the Organisation's on-going commitment to the setting and reviewing of occupational health and safety objectives.

All Objective Plans identify the task to be completed, the person responsible for ensuring the task is completed and a deadline date for its completion.

(b) Legal and Other Requirements

Many of the procedures and operations used within Comyn Ching Solray that are included in our risk assessment process have relevant guidance published by external agencies (HSE, BSI, etc) that will assist Comyn Ching Solray in complying with health and safety legislation.

We have produced a legal register of relevant legislation and associated guidance notes that are applicable to the activities currently conducted within the Organisation.

(c) Objectives

The Organisation's health and safety management system allows for two levels of Objectives:-

- i: System objectives Resulting from the management review of the health and safety system.
- ii: Re-active objectives Resulting from Risk Assessments, Accident Investigations, Audits etc.

(d) Occupational Health and Safety Management Programme

To ensure that nominated tasks are completed against designated target dates it is the responsibility of the Designated Appointed Person to carry out a review of the actions plans on a quarterly basis. More frequent reviews may be delegated to the Organisation's external Safety Advisors - Key Safety Solutions Limited.

Where tasks have been identified as behind the designated time scales, a joint decision between the senior management and its health and safety consultants will be made concerning the best corrective action to be taken.

4. IMPLEMENTATION AND OPERATION

(a) Structure and Responsibilities

Notwithstanding the fact that all members of staff within Comyn Ching Solray have a responsibility for their own safety and the safety of others, specific responsibilities have been assigned to designated personnel within the Organisation. This allows us to ensure that the health and safety management system operates in an effective manner.

An Organisational chart is provided within this policy which outlines the structure within Comyn Ching Solray for the maintenance and development of its safety management system. Although specific responsibilities and authorities may be contained within various procedures in our health and safety manual, the main system responsibilities have been assigned as follows:-

Alastair Ching (Managing Director)

- Has overall responsibility for ensuring that the Health and Safety Plan is formulated, reviewed annually, and provided with sufficient resources in terms of financial, human, time and material to ensure that it can succeed.
- Approves the Organisation's Health and Safety Policy and appoints a Management Representative to implement the management system in line with the Policy.

Alastair Ching (Designated Appointed Person)

- Has overall responsibility for ensuring the success of the Development Implementation Objectives through regular review of the Action Plan activities and reporting to the Managing Director any variations from the original target dates.
- Takes overall responsibility for ensuring that the Re-active Objectives are identified, documented and monitored through the use of Action Plans.
- Ensures that statutory, mandatory and other health and safety related training is identified, organised and delivered in a timely manner so as to ensure the maintenance of any necessary licensing / certification of individuals.
- Ensures that the risk assessment process is completed on an annual basis, or more frequently where changes in the normal activities occur.
- Ensures that any non-routine work is effectively controlled through the inspection of method statements and risk assessments, where appropriate, or by other measures that are from time to time implemented.

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- Have overall responsibility for ensuring that the health and safety management system is regularly audited and that any non-conformances are reviewed by senior management and corrective action taken
- Ensure that the annual risk assessment process is completed in a timely fashion and any issues arising are entered onto the Re-active Objectives Action Plan.
- Develop and Maintain the Legal Register and advise the Management on any changes that affect the information contained therein.
- Advise on all other relevant aspects of health and safety.

Employees' Responsibilities

In accordance with the Organisation's Health and Safety Policy, all employees have an individual responsibility and duty for:

- Making themselves familiar with, and conforming with, the Organisation's Health and Safety Policy at all times.
- Conforming to the Safety Rules and Safe Systems of Work Procedures at all times, including 'permit to work systems', inspection and testing etc.
- Wearing appropriate safety or protective equipment, personal footwear or clothing and using appropriate safety devices, as specified, at all times.
- Making suggestions to improve health and safety in the Company to the Management.
- Reporting without delay all risks or hazards, including defects to machinery, unsafe practices, and "near miss" situations directly to his/her Manager.
- Reporting without delay any injury suffered as the result of any accident during the course of their work to their immediate supervisor or First Aider as appropriate.
- Ensuring that good housekeeping is maintained at all times at their work station and surrounding area
- Taking reasonable care of themselves and other persons who may be affected by their actions whilst at work.

(b) Training, Awareness and Competence

Comyn Ching Solray recognises training as a key feature in its on-going programme to ensure an effective health and safety management system.

Training provisions within Comyn Ching Solray are divided into three main areas: -

- i: Induction Training** This is an internal programme covering the health and safety issues and activities of specific importance to employees who have been recruited / employed within the Organisation.
- ii: Job / Task Specific** This is an internal or external program where specialist skills or knowledge are required to conduct a specific task or activity.
- iii: Refresher** This is an internal or external programme where additional training will be provided at specified intervals for updating personnel trained in specific tasks.

As a means of ensuring training needs are identified and that relevant training is sourced either internally or externally, it is the responsibility of the Designated Appointed Person to ensure the on-going training needs of Comyn Ching Solray are completed in a timely manner.

(c) Consultation and Communication

Due to the overall size of the Organisation, consultation and communication of health and safety issues is generally undertaken on an informal basis between the management and the staff. The management recognises the importance of its staff in ensuring that we maintain an adequate safety management system.

The setting / reviewing of safety objectives is publicised to all members of staff to make sure that all employees within Comyn Ching Solray are involved in the development of the safety management system.

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If however, where more formal means of communication are required (e.g. accident / incident reports, buildings maintenance etc.), formal reporting procedures exist and employees are encouraged to report any item they feel may present a potential hazard.

In the event of any changes in the structure of the Organisation's safety management system, the need to convene a formal Health and Safety Committee would be discussed at Management Review.

(d) Documentation / Document and Data Control / Record and Record Management

All documentation held within the Organisation's health and safety management system is the responsibility of the Designated Appointed Person.

Additional reviews of these documents along with any other related guidance / legislation / standards may also be delegated to the Organisation's Safety Advisors – Key Safety Solutions Limited.

Procedures exist within the health and safety manual for the issue, review and revision of all documents and forms relevant to the health and safety management system.

Procedures also exist for controlling documents used within Comyn Ching Solray including the retention period and location of documentation.

(e) Operational Control

Procedures and safety working practices retained in the health and safety manual have been produced to outline the operational and management controls of relevant activities within the Organisation. These may include: -

- Routine and Non – Routine activities or operations, that may carry a significant risk.
- Activities / Operations that may require the assistance of external agencies (e.g. contractors).
- Building monitoring and maintenance.
- Equipment monitoring and maintenance.

In the majority of instances the production of any procedures or safe working practice will normally follow the completion of a suitable and sufficient risk assessment.

On occasions, it may be necessary to acquire risk assessments and method statements from a third party. This documentation will be reviewed by the Organisation's external Safety Advisors – Key Safety Solutions Limited

(f) Emergency Preparedness and Response

The nature of the work activities undertaken within Comyn Ching Solray are such that protracted emergency plans are not necessary and the provisions of COMAH (Control of Major Accident Hazard regulations) do not apply. However, where appropriate, procedures and safe working practices have been developed to address the potential emergency situations that could arise within the Organisation.

5. CHECKING AND CORRECTIVE ACTION

(a) Performance Measurement and Monitoring

The health and safety management system within Comyn Ching Solray allows for both pro-active and re-active monitoring.

Pro-active monitoring within Comyn Ching Solray can be achieved by any of the following means:

- Risk Assessments
- Monthly Workplace Inspections
- Daily / Weekly / Monthly Fire Inspections
- Periodic Statutory Inspections (i.e. Portable Appliance Testing, Fixed Electrical, Fire Equipment, etc.).
- Compliance with the various Action Plans

Re-active monitoring is undertaken following serious accidents or incidents, reports of ill-health or property damage.

It is the responsibility of the Designated Appointed Person to review both aspects of monitoring on a quarterly basis. This may also be achieved through the assistance of the Organisation's external Safety Advisors – Key Safety Solutions Limited

There is no measurement equipment used within Comyn Ching Solray that affects the performance of the health and safety management system.

Measurement of performance therefore focuses on an on-going evaluation of achieving the safety objectives within the time-scales agreed and from review of the relevant inspection documentation.

(b) Accidents, Incidents, Non-conformances and Corrective and Preventive Action

Procedures exist within the Organisation's health and safety policy to ensure that any variations from its policies and any uncontrolled activities are investigated and where appropriate remedial actions are planned and implemented.

Accidents, Incidents and Non-conformances within Comyn Ching Solray are divided into three main categories: -

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| i: Major Accidents / Incidents | These are always investigated and where appropriate reported to the enforcing Authorities |
| ii: Minor Accidents / Incidents | These are only investigated when sufficiently serious to warrant investigation |
| iii: Substantial variations to working practices resulting in dangerous occurrences arising | These are always investigated |

All investigations will be conducted by the Designated Appointed Person with any further assistance provided by the Organisations external Safety Advisors – Key Safety Solutions Limited. Any remedial actions resulting from the investigation will be recorded on an objective plan form HS17 for implementation by the Designated Appointed Person.

Corrective and Preventive Action

The need for corrective action is identified from the Inspection Documentation, Accident / Incident Reports or internal system audits. Where remedial action is required this action is divided into specific measurable tasks and entered onto the objective plan form HS17. Any corrective actions resulting from management review will be entered onto objective plan form HS17.

The need for preventative action is normally identified through the Risk Assessment Process; it may also be determined via the Remedial Action Plan process.

In both instances, on-going monitoring within Comyn Ching Solray assesses the suitability of the remedial actions taken and the successful implementation of these actions. In both instances the activities are reviewed at management review on an annual basis.

6. MANAGEMENT REVIEW

(a) Purpose of the Review

It is the responsibility of the Designated Appointed Person to ensure that annual Health and Safety Review Meetings are conducted at least annually and that all key personnel attend. The persons to be present at these meetings are:-

- The Managing Director / Chairman
- The Designated Appointed Person
- The Relevant Departmental Heads
- Key Safety Solutions Limited
- Any Other Person Co-opted to assist in the maintenance and development of the Organisation's health and safety management system

The review meeting determines the successful implementation of the health and safety management system and is considered to be the main forum for the discussion of any system objectives.

(b) Agenda for the Review Meeting

The Agenda for the meeting will typically include the following items:-

- Agree previous minutes.
- Review Non Conformances / Corrective Actions and Audit results
- Review of Risk Assessment and Results
- Changes in Health and Safety Legislation and its impact on the Organisation
- Review Objectives
- Set new Objectives
- Review the Health and Safety Policy, Policy Statement, Manual, Procedures and Safe Working Practices
- Assess any training needs
- Any other business

It is the responsibility of the Designated Appointed Person to issue and distribute minutes of the meeting, which includes copies of any new objectives that have been set. Copies of the minutes are communicated to each employee and a further copy is retained for Health and Safety records.

7. HEALTH & SAFETY COMMUNICATION STRUCTURE

This structure is for Safety purposes only.

