



Health and Safety Policy



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2 Purpose

The purpose of this Policy is to provide you with information about our Health and Safety Policy, procedures and arrangements. It also includes information about your duties as an employee and will help you to understand health and safety issues which affect you at work. This policy is also in line with and adheres to the Health and Safety Policy Statement

3 Applicability

This policy is applicable to all stakeholders, employees, and contractors working for Kao Data.

4 Policy

4.1 KAO DATA RESPONSIBILITIES

As an employer we must prepare a written health and safety policy statement explaining how we intend to protect the health and safety at work of our employees and anyone else who might be affected by our work activities. Our Health and Safety Policy and Arrangements documents reflect our commitment to the provision of a safe working environment. They also meet a requirement to identify the duties and responsibilities for employees with responsibilities for managing health and safety in our workplace.

We also have a responsibility and duty to ensure that you are:

- aware of and understand our Health and Safety General Policy;
- aware of and understand the health and safety rules relating to your work;
- provided with adequate information, instruction, training and supervision;
- made aware of the significant risks associated with your work activities and how they may affect others;
- provided with Safe Systems of Work; and
- provided with a safe and healthy working environment.

4.2 EMPLOYEES RESPONSIBILITIES

All employees have a legal duty to take reasonable care for themselves and others and to co-operate with management on all aspects of health and safety.

- You must co-operate with and follow all emergency arrangements as outlined in this document and supporting procedures. You must ensure that you are aware of our fire and evacuation procedures and the action you should take in the event of such an emergency.
- You must ensure that you report all accidents, near misses or damage to equipment and property as soon as possible. You must co-operate and assist with accident or incident investigations when asked.
- You must refrain from deliberate acts or interference with anything provided in the interests of health, safety and welfare. This includes alteration, removal or deliberate disablement of guards and other safety devices and unauthorised alteration or repair of equipment.
- You must carry out your tasks in a safe manner and follow any instructions, procedures or Safe Systems of Work given to you by managers and supervisors. If you identify a hazard or hazardous situation, you must immediately, or as soon as possible report, it to the person managing the work.
- You also have a duty to ensure that all personal protective equipment provided for you is worn as directed, kept clean, maintained and stored in the correct manner. Failure to do so could be a contravention of your health and safety responsibilities. Once issued, this protective wear/equipment is your responsibility.

Remember that these are statutory duties. The Enforcing Authorities can prosecute individual employees who fail to comply. Prosecution can result in heavy penalties - fines and or imprisonment.

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4.3 INTRODUCTION

Health and safety legislation places specific duties on employers to make arrangements to protect the health, safety and welfare of their employees whilst at work and anyone else (visitors, contractors, etc) who might be affected by their business activity.

To help us comply with these duties we have assigned specific health and safety responsibilities as shown on the subsequent page.

In addition, we have a health and safety management system that includes:

- our Health and Safety Policy;
- safety responsibilities for key personnel;
- safety arrangements to deal with health and safety issues in our workplace;
- risk assessments;
- procedures to deal with emergencies;
- employee safety rules; and
- additional information such as documented Safe Systems of Work, specific safety rules and fire precautions, are also provided.

Other health and safety information provided to employees includes:

- the official Health and Safety Law poster;
- a current Employer’s Liability Insurance Certificate;
- health and safety booklets and information sheets;
- information about significant findings from risk assessments and action to be taken; and
- information relating to Safe Systems of Work and work procedures.

We also have minimum standards and guidance as outlined below in relation to Health, Safety and also in our Health and Safety Arrangements and supporting policies and procedures.

We ask you to acknowledge that you have read and understood the rules set out in this policy, that you will adhere to them and any other rules or changes that are drawn to your attention by signing your induction checklist. We will also provide, as appropriate, additional documents, training and instruction to help you to carry out your work safely and without risk to your health.

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4.4 HEALTH AND SAFETY GENERAL POLICY STATEMENT

Kao Data recognises that it has responsibilities for the health and safety of our workforce whilst at work and others who could be affected by our work activities.

All Kao Data personnel and persons working on behalf of Kao Data are made aware of their responsibilities and required to take all reasonable precautions to ensure the safety, health and welfare of our workforce and anyone else likely to be affected by the operation of our business.

It is Kao Data’s policy to develop and maintain an Integrated (Quality, Environment, Information Security and Health and Safety) Management System (IMS) that commits, through our Health and Safety Policy to;

- Provide safe and healthy working conditions for the prevention of work-related injury and ill health
- Fulfil our legal and other applicable requirements
- Eliminate hazards and reducing occupational health and safety risks
- Continually improve our occupational health and safety management system
- Consulting with and the participation of our staff on the planning and development of our occupational health and safety management system

This will be achieved by;

- Actively managing and supervising health and safety at work
- Providing leadership and adequate control of identified health and safety risks
- Providing and maintaining safe plant and equipment
- Ensuring the safe handling and use of substances
- Providing information, instruction, training where necessary for our workforce, taking account of any who do not have English as a first language
- Ensuring that all workers are competent to do their work, and giving them appropriate training
- Having access to competent advice

We also recognise;

- our duty to co-operate and work with other employers and their workers, when their workers come onto our premises or sites to do work for us, to ensure the health and safety of everyone at work.

To help achieve our objectives and ensure our employees recognise their duties under health and safety legislation whilst at work, we will also remind them of their duty to take reasonable care for themselves and for others who might be affected by their activities.

These duties are explained on first employment at induction and set out in the Employee Arrangements, given to each employee, which sets out their duties and includes our specific health and safety rules.

This Policy is communicated to all person(s) working for or on behalf of Kao Data (as part of induction training), is available to all employees via the IMS and is displayed in each office location to continually remind employees of the Company’s commitment to the Health and Safety. In support of this policy, we have prepared a responsibility chart and specific arrangements in the following pages.

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4.5 HEALTH AND SAFETY ORGANISATION

The ultimate responsibility for health and safety rests with the Chief Operation Officer. All Directors will ensure health and safety is given suitable consideration and that board level decisions reflect the aims and objectives of the Policy.

To support its implementation, allocated specific responsibilities as set out here and in the following pages. Further details are available in our Health and Safety Arrangements.

	RACI			Documented		
	K A O	E M P L O Y E E S	J C A / I S S	E M P L O Y E E S	H & S	JCA /ISS SOPS EOPS
Safety Arrangements Responsibility Matrix Key: R = Responsible A = Accountable C = Consulted I = Informed						
Managing Safety & Health at Work	R	R, C, I		A	A	
Accident, Incident, Ill Health Reporting and Investigation	R	C, I	A	A	A	
Workplace H&S Consultation- Safety Reps	R	C, I		A	A	
Risk Assessment and Hazard Reporting	R	I	A	A	A	
Occupational Health and Health Surveillance	R	I		A	A	
Substance & Alcohol Abuse	R	I		A	A	
Purchasing	R	C, I		A	A	
New and Expectant Mothers	R	I		A	A	
Employing Children & Young Persons	R	I		A	A	
Lone Working	R	I		A	A	
Health & Safety Training	R	C, I		A	A	
Health & Safety of Visitors	R	R, I	A	A	A	
Personal Protective Equipment	R	I	A			A
Home Working	R	I		A	A	
Safe Systems of Work	R	I	A			A
Action on Enforcing Authority Reports	R	I		A	A	
Equality and Disability Discrimination Compliance	R	I		A	A	
H&S Information for Employees	R	C, I		A	A	
Working Abroad	R	I		A	A	
Fire Safety - Arrangements and Procedures (Emergency Preparedness)	R	R, I	A	A	A	
First Aid	R	I		A	A	
Welfare, Staff Amenities, Rest Rooms & the Working Environment	R	I		A	A	
Housekeeping and Cleaning	R	R, I	A			A
Pest Control	R	I	A			A
Building Services	R	I	A			A
The Control of Hazardous & Non-Hazardous Waste	R	I	A			A
Access, Egress, Stairs & Floors	R	I	A			A
Windows, Glass & Glazing in the Workplace	R	I	A			A

Safety Arrangements Responsibility Matrix Key: R = Responsible A = Accountable C = Consulted I = Informed	RACI			Documented		
	K A O	E M P L O Y E E S	J C A / I S S	E M P L O Y E E S	H & S	JCA / ISS SOPS EOPS
Working in the Open Air	R	I	A			A
Site Work	R	I	A			A
Water Temperature Control	R	I	A			A
Premises	R	I	A			A
Teagle Openings & Similar Doorways	R	I	A			A
Electrical Safety	R	I	A			A
The Provision, Use & Maintenance of Work Equipment	R	I	A			A
Slips, Trips & Falls	R	I	A	A	A	
Special Events	R	I		A	A	
Pressure Systems	R	I	A			A
Lifting Equipment & Lifting Operations	R	I	A			A
Lifts	R	I	A			A
Working Time, Night Work and Shift Working	R	I	A	A	A	
Work Related Upper Limb Disorders WRULD	R	I		A	A	
Manual Handling	R	I	A	A	A	
Display Screen Equipment & DSE User Eye Tests & Spectacles	R	C, I		A	A	
Legionella Control	R	I	A			A
Asbestos at Work-2000+ Premises Clear & No Off-Site Risk	N/ A	I				
Stress in the Workplace	R	I		A	A	
Aggression & Violence in the Workplace	R	I		A	A	
Contractor Control & Management	R	I		A	A	
CDM – Client	R	I	A	A	A	

4.6 MANAGING SAFETY AND HEALTH AT WORK

We recognise the business benefits that can accrue from the effective management of safety and health at work. To obtain these benefits for our company we have recognised the need for an effective management system and have taken steps to put such a system in place.

The Chief Operating Officer regularly consults with staff and contractors working on and off the site. All staff and contractors are encouraged to participate and provide input to the planning and development of the IMS including the Health and Safety Management System, including identifying improvement opportunities and evaluating performance.

4.7 ACCIDENT, INCIDENT, ILL HEALTH REPORTING AND INVESTIGATION

We encourage our employees to report all personal injury accidents, near miss incidents (dangerous occurrences) and ill-health that happen in the course of their work so that we can investigate the causes, learn from experience and improve our management of health and safety. We also use the information to help us meet our obligations under the legislation requiring accidents to be reported to the Enforcing Authority.

All accidents and incidents are managed and investigated in accordance with our Accident and Incidents Reporting Procedure PRO013. In addition to recording accidents in the Company’s Accident Books, the Service and Maintenance Contract Supplier maintains a record of any Environmental or Health & Safety accidents or incidents on the Accident Log. These are reported to and reviewed at the regular review meetings held with the Service and Maintenance Contract Supplier and at the Management Review.

4.8 WORKPLACE HEALTH AND SAFETY COMMUNICATION, PARTICIPATION & CONSULTATION

We have a duty to consult with our workforce on matters affecting their health, safety and welfare whilst at work. To meet this obligation, we have established a process for Managers to consult with employees and elected safety representatives about work-related health, safety and welfare issues through regular team meetings and management reviews.

The Chief Operating Officer also regularly consults with staff and contractors working on and off the site. All staff and contractors are encouraged to participate and provide input including identifying improvement opportunities and evaluating performance.

You must comply with all workplace warning signs, signals and notices displayed. We also use this system to deliver simple safety messages and rules through short toolbox talks.

4.9 RISK ASSESSMENT

We have a duty to assess the significant risks arising out of our business activities and for specific areas of concern. We have a duty to implement the findings of these risk assessments to ensure the safety, health and welfare of our employees and others who may be affected by our work activity.

To support this process and our management of health and safety we encourage our employees to report all hazards observed in the course of their work, so that potential risks can be identified, and the appropriate action taken. These hazards should be reported to the Compliance Manager, or representative and logged on the relevant risk register and/or CSIP (Continual Service Improvement Program).

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4.10 RISK ASSESSMENT AND HAZARD REPORTING

We have a duty to assess the significant risks arising out of our business activities and for specific areas of concern. We have a duty to implement the findings of these risk assessments to ensure the safety, health and welfare of our employees and others who may be affected by our work activity.

To support this process and our management of health and safety we encourage our employees to report all hazards observed in the course of their work, so that potential risks can be identified, and the appropriate action taken.

Our Risk Assessment Procedure and templates establishes and maintains risk criteria that include the risk acceptance criteria and criteria for performing risk assessments to ensures that repeated risk assessments produce consistent, valid, and comparable results.

4.11 OCCUPATIONAL HEALTH AND HEALTH SURVEILLANCE

We have a duty to ensure the health and wellbeing of our employees who may be affected by the incidence of ill health arising from their work activities. We shall implement systematic, regular, and appropriate procedures to detect early signs of work-related ill health among employees exposed to certain health risks; and acting on the results.

- You must report to management any medical condition or use of medication which could affect your safety or the safety of others.
- You must cooperate with the organisation's health surveillance provisions. You must inform management, as soon as possible, if you are pregnant.
- You must inform management of any infections or illness immediately. Decisions to keep you away from work, due to illness, will only be taken after careful consideration.
- You must not attend work under the influence of either alcohol or illegal drugs.

If you arrive for work and, in our opinion, you are not fit to work, we reserve the right to exercise our duty of care if we believe that you may not be able to undertake your duties in a safe manner or may pose a safety risk to others, and send you away for the remainder of the day with or without pay and, dependent on the circumstances, you may be liable to disciplinary action.

4.12 SUBSTANCE AND ALCOHOL ABUSE

We have a duty to protect the safety, health and welfare of our employees and others from the hazards that may arise as a result of workers abusing alcohol and other substances.

You must follow our Drugs and Alcohol Policy. Under legislation we, as your employer, have a duty to ensure as far as is reasonably practicable, the health and safety and welfare at work of all our employees and similarly you have a responsibility to yourself and your colleagues. The use of alcohol and drugs may impair the safe and efficient running of the business and/or the health and safety of our employees.

If your performance or attendance at work is affected because of alcohol or drugs, or we believe you have been involved in any drug related action/offence, you may be subject to disciplinary action and dependent on the circumstances, this may lead to your dismissal.

4.13 PURCHASING

We have a duty to ensure the safety, health and welfare of our employees and others who enter our premises, and we have systems in place to protect these groups from any adverse effects of all plant, equipment, supplies and substances that we purchase to support our work activities.

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The Supplier Management Procedure defines how the company sources and purchases core services to meet the Company's requirements. Kao Data ensure that only approved third parties will be considered for supply of service to customers.

Third party supplier relationships including Outsourcing are managed in accordance with the Supplier Management Procedure.

4.14 NEW AND EXPECTANT MOTHERS

We have a duty to protect the health of new and expectant mothers from hazards that might be present in the workplace. We also have a duty to assess the risks to women of childbearing age from our activities and inform them of any potential risks that might affect a pregnancy.

4.15 EMPLOYING CHILDREN AND YOUNG PERSONS

When we employ children and young persons or give them work experience, we have duties to protect their safety, health and welfare whilst at work.

4.16 LONE WORKING

Our company has a duty to ensure the safety, health and welfare of our workforce whilst at work. That duty extends to employees who travel during their work and those who work away from our core premises.

4.17 HEALTH AND SAFETY TRAINING

We have a duty to protect the health, safety and welfare of our employees whilst they are at work and others who might be affected by our work activities. Among other specific arrangements we need to be sure that our workforce is trained to recognise hazards and risks and what they need to do to eliminate, reduce and avoid risk.

4.18 HEALTH AND SAFETY OF VISITORS

We have a duty to ensure the health and safety of members of the public who come into our workplace.

4.19 HOME WORKING

We have a duty to protect our employees from the hazards and risks which may arise when employees work from home.

4.20 ACTION ON ENFORCEMENT AUTHORITY REPORTS

We recognise the benefits that will accrue from prompt action following receipt of reports from the Enforcement Authority regarding health safety and welfare issues. To obtain these benefits we have recognised the need for an effective management system and have taken steps to be able to action such reports.

4.21 EQUALITY, DISABILITY, DISCRIMINATION AND COMPLIANCE

We recognise the benefits that will accrue from planned and carefully considered arrangements regarding the equal treatment of all people including health, safety, and welfare issues. To obtain these benefits we have recognised the need for an effective management system and have taken steps to be able to successfully manage disability in the workplace.

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4.22 HEALTH AND SAFETY INFORMATION FOR EMPLOYEES

We recognise the benefits that will accrue from the provision of effective information regarding health safety and welfare activities to our employees. To obtain these benefits we have recognised the need for an effective management system and have taken steps to provide adequate information to employees and others.

4.23 FIRE SAFETY – ARRANGEMENTS AND PROCEDURES

We have a legal duty to implement and maintain a fire safety programme, for assessing and controlling the risks from an outbreak of fire and for the provision of fire warnings, firefighting equipment, emergency lighting, emergency signs, adequate means of escape and evacuation procedures. We have put in place arrangements to meet these responsibilities and to identify and reduce the risks associated with fire and emergency situations.

- You must report any use of firefighting equipment to management.
- Do not attempt to fight fires unless you have been trained how to do so. You must comply with all established emergency procedures.
- You must not obstruct any fire escape route, fire equipment or fire doors at any time. Locked or obstructed fire escape routes must be reported immediately to management.
- You must not interfere with or misuse any fire equipment provided.
- Fire doors should always be kept closed, unless fitted with an automatic release device.

Evacuation procedures will be communicated during induction and in the event of an incident the Emergency Preparedness and Response Procedure must be followed for the relevant site (facility).

4.24 FIRST AID

We have a duty to provide suitable first aid arrangements for our staff whilst at work and visitors who may be affected by our activities. We have taken steps to provide first aid arrangements that meet this requirement. Your nominated first aider will be identified during your induction.

Any exposed cut or burn must be covered with a first-aid dressing. If you are suffering from an infectious or contagious disease or illness such as rubella or hepatitis you must not report for work without clearance from your own doctor. Contact with any person suffering from an infectious or contagious disease must be reported before commencing work.

4.25 WELFARE, STAFF AMENITIES, REST ROOMS AND THE WORKING ENVIRONMENT

We are obliged to make and maintain arrangements for welfare and the provision of a safe and healthy working environment for our workforce whilst they are at work. This includes a duty to provide restrooms where work is arduous or conducted in a hostile environment and for the welfare of new and expectant mothers.

We provide a break-out room and refreshment making facilities for your use, which must always be kept clean and tidy.

4.26 HOUSEKEEPING AND CLEANING

We have a duty to ensure the safety, health and welfare of our employees and others who enter our premises by keeping it in a clean, tidy and sanitary condition.

- You must dispose of all rubbish and waste materials as instructed in line with our Waste Management procedure.
- You must report any hazardous conditions to management.
- You must clear up any spillage within the work area as soon as possible and report any hazardous conditions that exist.
- You must keep all areas clean and tidy.

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4.27 OFFICE EQUIPMENT

We have a duty to protect our employees and other people who use our premises from the risks associated with the use of office equipment.

- You must not operate any equipment or use hazardous substances unless you have been trained and authorised to do so.
- You must use all work equipment in accordance with your training and instructions.
- You must report any fault, damage, defect or malfunction in any equipment to management immediately or, if this is not possible, as soon as reasonably practicable.
- You must not repair any work equipment unless you have been trained and authorised.
- Work equipment must not be left switched on without someone in control of it.
- You must use all hazardous substances in accordance with written assessments and instructions.
- You must use the correct tools provided at work.

4.28 SLIPS, TRIPS & FALLS

We have a duty to protect our workers and others visiting our premises from the risks of slipping, tripping and falling. Further guidance is given during induction.

You must comply with all workplace warning signs, signals and notices displayed.

4.29 SPECIAL FUNCTIONS

When we organise functions, we have a duty to protect our own workforce and others from the hazards and risks that are present; these will vary according to the type of function and its location.

4.30 WORKING TIME, NIGHT WORK AND SHIFT WORKING

We have a duty to take account of the hazards and risk of long working hours, night and shift work and to ensure the health and safety of members of our workforce who work at night and on shifts.

4.31 WORK RELATED UPPER LIMB DISORDERS (WRULD)

We have a duty to protect our workforce from the risk of Work-Related Upper Limb Disorders (WRULD) which could arise from our work activities.

4.32 MANUAL HANDLING

We have a duty to ensure the safety, health and welfare of our employees and others who enter our premises from the risks present in manual handling activities.

You must carry out manual handling tasks as instructed. You must comply with all of our safe working procedures and guidance provided during your induction. When at work you must always wear suitable footwear.

You are required, in accordance with the Manual Handling Regulations 1992, to advise us of any condition which may make you more vulnerable to injury.

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4.33 DISPLAY SCREEN EQUIPMENT & DSE USER EYE TESTS & SPECTACLES

We have a duty to protect the safety, health and welfare of our workforce from the risk involved in the use of Display Screen Equipment (DSE). Regular DSE assessments will be completed, and actions addressed. All employees are to advise their Line Manager of any requirements proactively.

4.34 STRESS IN THE WORKPLACE

We recognise that we have a duty to act to reduce and where reasonably practicable to eliminate ill health which is caused by work related stress and will work with individuals on carrying out any associated risk assessment.

4.35 AGGRESSION & VIOLENCE IN THE WORKPLACE

We recognise that we have a duty to act to reduce so far as is reasonably practicable the risk of aggression and violence to our workforce whilst at work which arise from clients and/or the nature of our work.

4.36 CONTRACTOR CONTROL & MANAGEMENT

To enhance the safety of our workforce and others, we implement effective methods to reduce the risks presented using contractors and subcontractors.

We ascertain the competence of contractors and subcontractors and ensure our employees and others are adequately protected from the risks posed by situations where these groups are engaged and put systems into place to achieve this.

The Supplier Management Procedure defines how the company sources and purchases core services to meet the Company's requirements. Kao Data ensure that only approved third parties will be considered for supply of service to customers.


Third party supplier relationships including Outsourcing are managed in accordance with the Supplier Management Procedure.

4.37 CDM – CLIENT

We recognise that as a client for construction work (including building maintenance, refurbishment, and demolition) we have specific responsibilities under the Construction Design and Management Regulations (CDM).


5 SIGN OFF

Signed

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