

Conte		n
	h, Safety and Wellbeing Policy Statement	
	- Introduction, organisation overview and roles and responsibilities	
	luction	
	anisational structure	
	ponsibilities	
	op Level Management	
	SEQ Team	
	lanagement Team	
	ransport Manager	
	ontroller of Premises	
	eam leaders, Supervisors (Black Hats)	
	peratives	
	mployees	
Part 3	- Arrangements	11
Sco	pe	11
1.	Health, Safety and Wellbeing Policy Review	
2.	OHSMS Objectives	11
3.	Communication, participation and consultation	11
4.	Compliance Management	12
5.	Legal and other requirements	12
6.	Monitoring and Measurement	13
7.	Management System Review	13
8.	Training and Information	13
9.	Accidents - Incidents Reporting and Investigations	13
10.	First-Aid	14
11.	Work Equipment (PUWER)	14
12.	Lifting Equipment and Lifting Operations (LOLER)	15
13.	Hazard Identification and Risk Management	15
14.	Control of Substances Hazardous to Health (COSHH)	16
15.	Fire Management	16
16.	Lone Workers	17
17.	Display Screen Equipment (DSE)	17



18.	Occupational Road Risk	18
19.	Stress	19
20.	Drugs and Alcohol	19
21.	Contractual Duties and Contractors	20
22.	CDM	20
23.	Electrical Safety	20
24.	Working at Heights	21
25.	Asbestos	22
26.	Smoking	22
27.	Manual Handling	23
28.	Confined Spaces	23
29.	Visitors	23
30.	Personal Protective Equipment	23
31.	Occupational Health	24
32.	Emergency Preparedness	24
33.	Workplace Environment and Plant & Vehicle Management	24
34.	Noise	25
35.	Vibration	25
36.	Young Persons	25
37.	Inductions	26
38.	Overseas Travel	26
39.	Declaration	28



Health, Safety and Wellbeing Policy Statement

Highway Care Ltd is committed to achieving the highest standards of health, safety, and wellbeing throughout our business, recognising the equal importance of both physical and mental health of our employees.

Our commitment extends to others who may undertake work on our behalf and those who may be affected by our activities. We will therefore, as a minimum, comply with all relevant occupational health and safety legislation along with other standards or compliance requirements to which we subscribe.

We consider the management of health, safety, and wellbeing to be integral to the good management of our business and we are fully committed to the continual improvement of our health, safety, and wellbeing performance. To assist us in achieving our goal we have implemented an Occupational Health and Safety Management System (OHSMS) to meet the requirements of ISO 45001:2018, which is audited by a UKAS registered certification body.

We will, so far as is reasonably practicable, commit to:

- Providing adequate control of health and safety risks for employees, non-employees and third parties arising out of our work activities and will maintain healthy and safe working environments.
- Identifying and implementing mitigation measures for all our health, safety and wellbeing risks associated with our work.
- Eliminating incidents, injuries, and cases of occupational ill-heath with our goal to ensure everyone goes home safe and well at the end of day.
- Providing safe plant, equipment and facilities ensuring that they are maintained in accordance with the manufacturer's instructions or industry best practice.
- Ensuring the safe handling, transportation, and use of substances in the workplace.
- Ensuring the competency of our employees, and others under our control, to undertake the work required of them and to provide suitable and sufficient training, instruction, and supervision.
- Consulting with our employees on all matters of their health, safety, and wellbeing along with encouraging the inclusion of employees at all levels in support of this policy and the OHSMS objectives.
- Ensuring that employees work safely and are competent to do so, considering their level of responsibility and authority.
- Communicating this policy and its arrangements to all our employees.
- Promoting health, safety, and wellbeing in the workplace to create a positive health and safety culture.
- Considering equality or diversity issues where they could affect the implementation of this policy.
- Ensuring that adequate resources are available to effectively manage health, safety, and wellbeing within the business, and providing the appropriate procedures to support this.
- Maintaining our OHSMS and its certification to ISO 45001:2018 to facilitate the implementation of this policy.
- Continual improvement of the OHSMS through the Non-Conformance and Opportunity For Improvement process, considering the needs of internal, supplier and customer stakeholders.

Signed

Name Date

S Millington 24/11/2023

Position

CEO

Stewoord fullyon



Part 2 - Introduction, organisation overview and roles and responsibilities

Introduction

Highway Care Ltd is responsible for the occupational health, safety and wellbeing of our employees and others who can be affected by our activities. This responsibility includes promoting and protecting physical and mental health. Our OHSMS is intended to enable us to provide safe and healthy workplaces, prevent work-related injury and ill health, and continually improve our health and safety performance.

The purpose of this policy and our OHSMS is to provide a framework for managing H&S risks and opportunities.

The aim and intended outcomes of our OHSMS is to prevent work-related injury and ill health to our employees and to provide safe and healthy workplaces; consequently, it is critically important for us to eliminate workplace hazards and minimise H&S risks by taking effective preventive and protective measures.

Our OHSMS approach is aligned to ISO 45001 and consequently adopts the concept of Plan-Do-Check-Act (PDCA). The PDCA concept is an iterative process used by many organisations to achieve continual improvement.

It is applied to our management system and to each of its individual elements, as follows:

- a) Plan: Determining and assessing our risks and opportunities and establishing health and safety objectives and processes necessary to deliver results in accordance with this policy.
- b) Do: Implement the processes as planned.
- c) Check: Monitor and measure activities and processes regarding this policy and our health and safety objectives and report the results.
- d) Act: Take action to continually improve our health and safety performance to achieve the intended outcomes.

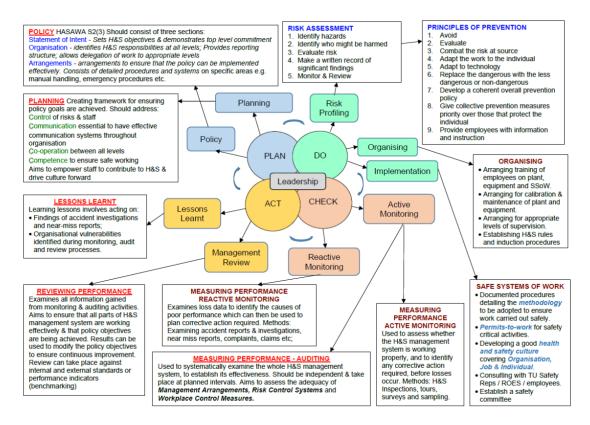
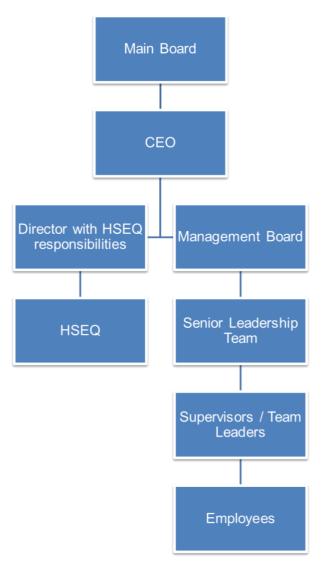


Figure 1: PDCA and its interaction with ISO 45001



Organisational structure

The chart below provides a simplistic overview of corporate governance and the reporting structure within Highway Care Ltd.



Note 1: Not all departments have supervisory staff in post and therefore the reporting line is direct between the Management team and the employees who work directly for them.

Note 2: The Director with HSEQ responsibilities is also considered part of the Executive Management Team but is shown separately here for clarity purposes.



Responsibilities

Top management shall ensure that the responsibilities and authorities for relevant roles within the OHSMS are assigned and communicated at all levels within the organization and maintained as documented information. Employees at each level of the company shall assume responsibility for those aspects of the OHSMS over which they have control as outlined below.

For the purposes of this policy, and in accordance with ISO 45001, the CEO, and the Executive Leadership Team (ELT), which includes the Director with Health & Safety Responsibilities, are considered as 'Top Level Management'.

Top Level Management

Both the CEO and the Executive Leadership Team (ELT) shall demonstrate their leadership and commitment with respect to this policy and the OHSMS by:

- a) taking overall responsibility and accountability for the prevention of work-related injury and ill health, as well as the provision of safe and healthy workplaces and activities.
- b) ensuring that this health and safety policy and the associated health and safety objectives are established and are compatible with the strategic direction of the company.
- c) ensuring the integration of the OHSMS requirements into the company's business processes.
- d) ensuring that the resources needed to establish, implement, maintain, and improve the OHSMS are available.
- e) communicating the importance of effective health and safety management and of conforming to the OHSMS requirements.
- f) ensuring that the OHSMS achieves its intended outcome(s).
- g) directing and supporting persons to contribute to the effectiveness of the OHSMS.
- h) ensuring and promoting continual improvement.
- i) supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.
- j) developing, leading, and promoting a culture in the company that supports the intended outcomes of the OHSMS.
- k) protecting employees from reprisals when reporting incidents, hazards, risks, and opportunities.
- l) ensuring the company establishes and implements a process(es) for consultation and participation of employees.

HSEQ Team

The HSEQ Team is responsible for managing the specialist HSEQ resources in the business, for the day-to-day operating of the OHSMS and for the provision of health and safety advice to the company. The HSEQ Team works closely with the ELT and the Management Team to provide support and guidance.

The HSEQ Team is responsible for the development and implementation of efficient and effective processes, procedures, and guidance to enable the business to comply with all relevant health and safety legislation and any other requirements to which it subscribes. In addition to this, the HSEQ Team is responsible for reporting all relevant incidents to the HSE under RIDDOR requirements.

The HSEQ Team is responsible for the development of the monitoring programme which includes, but not limited to:

• Periodic ad-hoc site inspections



- Internal audits against the requirements of ISO 45001
- External audits against the requirements of ISO 45001
- Programmed depot and site inspections with management teams
- Legislation compliance

Management Team

The Management Team are responsible for the safe delivery of the products and services that Highway Care Ltd offers. They will, so far as is reasonably practicable, ensure the Health, Safety and Wellbeing of all our employees, sub-contractors and others who may be affected by our undertakings whilst working on site and in our depots. This is a delegated responsibility from the ELT, who maintain overall responsibility.

Supervision

The Management Team will work closely with the HSEQ Team to provide suitable and sufficient supervision of employees, sub-contractors or agency personnel whilst working on site or in our depots. This responsibility can be delegated to the Supervisors, but ultimate responsibility is maintained.

Instruction

The Management Team are responsible for providing clear and accurate instructions either written or verbally to the employees, sub-contractors, or agency personnel under their management. Where required the Management Team are responsible for completing and recording these instructions, which will take many forms, for example (not an exhaustive list):

- Method Statements
- Risk Assessments
- Safe systems of work
- Job packs
- Briefings and Toolbox Talks

Training

The Management Team are responsible for ensuring that the employees working for them are trained and competent to undertake the work that they are required to do. Training is not just limited to undertaking specific training courses but can be gained by other means such as shadowing or learning from others. They are also responsible for ensuring that the training needs of their teams are evaluated and regularly reviewed.

Other responsibilities

The Management Team hold the responsibility for

- Report all safety related incidents, and dangerous occurrences through work under their control to the HSEQ Team.
- Ensure that all plant, work & safety equipment within their remit is safe and suitable to use, and that all necessary Personal Protective Equipment is available, correctly used, monitored, and recorded.
- Ensure that all employees and non-employees under their remit and requiring access to a client's site have been formally inducted & adhere to the site rules (both HC and Client).
- They will encourage employees and contractors into orderly working and hygienic habits to organise and maintain a hazard free environment.
- They will encourage a good standard of site safety and housekeeping on all projects under their control.
- They will ensure that H&S matters receive full consideration in the planning of work, new projects, and the purchase and allocation of new equipment.



Transport Manager

The Transport Manager is responsible for ensuring so far as is reasonably practicable that the Health, Safety and Environmental Policy, and good HSEQ practices, are applied in areas for which they are responsible. They must ensure so far as is reasonably practicable the effective management of health, safety and environmental risks including those associated with contractors and service providers.

The Transport Manager will ensure so far as is reasonably practicable that all relevant statutory reporting and licensing requirements for those activities for which they are responsible are met and any associated statutory maintenance / service records, training records and health assessment records are in place, monitored, recorded, and stored in accordance with relevant statutory and company requirements.

The Transport Manager will, so far as is reasonably practicable ensure the safe principles of People, Plant & Vehicle interface are provided and monitored, and any improvement opportunities are reported in accordance with the company reporting procedures.

The Transport Manager is supported in his duties by designated staff with identified responsibilities.

The Transport Manager will also assist with the management of disciplinary action where necessary for breaches of health and safety rules or failure to comply with this Policy.

Controller of Premises

The Controller of Premises is not an exclusive role and is an extension of another role previously mentioned.

They are responsible for ensuring so far as is reasonably practicable that the Health, Safety and Environmental Policy, and good HSEQ practices, are applied in those premises, or areas of premises for which they are responsible.

They must ensure so far as is reasonably practicable the effective management of health, safety and environmental risks associated with providing safe and environmentally considerate premises, and those associated health, safety and environmental risks associated with contractors and service providers undertaking activities within Highway Care controlled premises.

The Controller of Premises will ensure, so far as is reasonably practicable that all relevant statutory testing, maintenance and servicing requirements for those premises, or areas of premises for which they are responsible are met. They are also responsible for any associated relevant records are in place, monitored, recorded, and stored in accordance with relevant statutory and company requirements.

The Controller of Premises will, so far as is reasonably practicable that any failings or improvement opportunities are reported in accordance with the company reporting procedures.

Team leaders, Supervisors (Black Hats)

All Team Leaders and Supervisors (collectively known as Black Hats) employed in an operational capacity – are responsible for ensuring so far as is reasonably practicable that the Health, Safety and Environmental Policy, and good HSEQ practices, are applied in those areas for which they are responsible.

All Team Leaders and Supervisors must ensure, so far as is reasonably practicable, the effective monitoring, supervision, and implementation of the OHSMS and those measures that control the health and safety risks associated with our undertakings.

All Team Leaders and Supervisors will ensure, so far as is reasonably practicable, that those staff members for which they are responsible are competent, trained and receive the necessary information and instructions to undertake their work activities safely.



All Team Leaders and Supervisors will also assist with the management of disciplinary action where necessary for breaches of health and safety rules or failure to comply with this Policy.

Operatives

They will know and operate within statutory and company requirements applicable to the installation work being undertaken.

They will make sure that all plant, tools, and equipment used on site is maintained in good order and safe to use.

They will check and make sure that there is safe access to and egress from all of their places of work and ensure that their place of work is safe.

They will make sure that all the relevant site safe operating procedures, method statements, permits to work and instructions are known and observed and will be fully aware of any site safety plan rules and instructions.

Employees also have a vital role to play in the achievement of a safe and healthy working environment, and

- Familiarising themselves with, and conforming to, health and safety rules and regulations.
- Take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions at work. This includes using safety equipment, protective clothing, and safety devices as appropriate.
- Not to play practical jokes or "horse play" on site.
- Not to use plant or equipment for work for which it was not intended or if they are not trained to use it.
- They will not use at any time, mobile phones*, portable DVD players and any form of personal music player including MP3, radios etc. For Mobile phone policy refer to Safe Working Practices and Policies section of this manual. (*Client site requirements may supersede the company policy for key persons involved in operations.)
- Not to misuse or recklessly interfere with any equipment or materials which are provided in the interest of Health and Safety and Welfare.
- Reporting all incidents and damage to equipment to their Operations Manager, whether persons are injured or not and assisting in accident investigation.
- Report all hazards and risks to the Operations Manager and make incident reports. Employees are encouraged to make suggestions to improve site Health and Safety.
- Co-operate with Management to perform any duty or comply with any requirement imposed on them as a result if any health and safety legislation that may be in force.
- Must be observant and look out for risks and take all sensible precautions to prevent accidents.
- Safety guards and equipment must be kept in position. In case of doubt guidance should be sought from an Operations Manager.

Employees

Every employee must, while at work:

a) take reasonable care for the safety of themselves and of any other relevant persons who may be affected by their acts or omissions at work.



- b) as regards any duty or requirement imposed on their employer by or under any provision of health and safety legislation, co-operate with him so far as is necessary to enable that duty or requirement to be performed or complied with; and
- c) inform their line manager or any other employee with specific responsibility for the safety of his fellow employees:
 - i. of any work situation which a person with the first-mentioned employee's training and instruction would reasonably consider represented a serious and immediate danger to safety; and
 - ii. of any matter which a person with the first-mentioned employee's training and instruction would reasonably consider represented a shortcoming in the protection arrangements for safety.



Part 3 - Arrangements

Scope

These arrangements and the Highway Care Limited OHSMS will apply to all Highway Care Limited employees and others working under its control and or affected by its activities, regardless of work location and / or operating business.

All Supporting documents are located and maintained within the Highway Care Limited BMS.

1. Health, Safety and Wellbeing Policy Review

This Health, Safety and Wellbeing policy shall be reviewed at least once in every 12-month period by the HSEQ Team and signed into effect by the CEO.

2. OHSMS Objectives

Each year a new set of OHSMS objectives will be set by the HSEQ Team in conjunction with the Director with Health & Safety Responsibilities. These will be reviewed in-line with our Management Review procedure.

Supporting policies or procedures

IMP-006 Management Review Annual objectives

3. Communication, participation, and consultation

In order to comply with relevant legislation and encourage participation, shared knowledge, and best practice, Highway Care Limited will consult and communicate with employees and others working under its control and or affected by its activities on matters affecting their health and safety in accordance with our Communication Policy.

Employees are encouraged to make suggestions that may improve health and safety within the Company. These may be made to the Director with Health & Safety Responsibilities and the HSEQ Team.

Top Level Management are, where applicable, responsible for ensuring that effective consultation with Trades Union/Non-Trades Union Health and Safety Representatives and staff is established and maintained in accordance with any appropriate legislation.

Highway Care Limited will endeavour to maintain communications with staff by the following methods:

- Information in notice boards
- In-house publications
- Email
- Face to face meetings
- Intranet Microsoft Teams
- HR Toolkit
- The business will encourage feedback from all sources both within and outside Highway Care Limited.

With Other Agencies

Highway Care Limited will provide facilities for any required briefings between the business and emergency or other external services. Highway Care Limited will endeavour to provide representation at the appropriate level for all meetings with such services. Highway Care Limited will encourage liaison with agencies through joint exercises, planning and exchange of information.

Supporting policies or procedures
POL-021 Communication Policy



4. Compliance Management

In order to maintain a healthy and safe working environment, competent persons will carry out any necessary health and safety compliance audits & inspections in order to give advice on the requirements of the relevant statutory provisions, compliance with this policy and health and safety matters generally.

Supporting policies or procedures

IMP-064 Compliance Management IMP-011 Internal Audits

Internal Inspections

The HSEQ Team has overall responsibility for determining and delivering the monitoring programme. This can be made up of periodic and ad-hoc inspections.

The HSEQ Team shall carry out regular internal HSEQ inspections and compliance evaluations and maintain a schedule for planned visits.

Internal Audits

The HSEQ Team has overall responsibility for determining and delivering the internal auditing 2-year programme.

Internal audits are conducted in accordance with ISO 45001 and may be undertaken by the HSEQ Team or a thirdparty consultant.

The outputs from any internal audit are added to the Internal/External Non-conformity register (IENC).

External Audits

The HSEQ Team has overall responsibility for determining and delivering the external auditing 3-year programme.

External audits are conducted in accordance with ISO 45001 and are undertaken by a third-party consultant (DNV).

The outputs from any external audit are added to the Internal/External Non-Conformity register (IENC).

Non-conformity, corrective action, risks, and opportunities

Non-conformities are raised from both internal and external audits. These non-conformities may be major or minor in status, but both are treated in the same fashion. All non-conformities are recorded on the IENC register where corrective action(s) are identified and completed. Evaluation of the actions taken leads to further risks or opportunities being identified and these too are captured in this register.

Further information can be found in the IMS Manual.

Supporting policies or procedures	
IMP-011 Internal Audits	
IMP-010 Improvement Opportunities	
IMP-049 Workplace Inspection Procedure	
IMS Manual	

5. Legal and other requirements

The legal and other requirements relevant to services and activities carried out by the business are identified in the Legal and Other Requirements Register maintained by the HSEQ Team.

These are reviewed regularly in accordance with procedure and significant changes and consultations communicated and consulted on with the business through the measures outlined in section 3.



HSEQ Legal Register

Internal / External 3-year audit schedule

IMS Manual

6. **Monitoring and Measurement**

Procedures are in place to monitor and measure any of Highway Care Limited's activities which could have a significant effect on health & safety requirements, including compliance with legal requirements, measurement of performance indicators, operational controls and achievement of objectives and targets.

7. **Management System Review**

The Director with Safety responsibilities along with the HSEQ Team will meet at least once per year or more to evaluate all the management systems and their performance since the last review.

Supporting policies or procedures

IMP-006 Management Review **IMS Manual**

8. **Training and Information**

It is a Line Management responsibility to ensure that any specific HSEQ training needs are identified, and appropriate training arranged in consultation with HR and/or the HSEQ Team.

Specific levels of HSEQ training will be initially set at a business level and further by the departments in consultation with HR and or HSEQ/BMS Management. Training will also be provided if new technology or new working methods are introduced.

All new employees will be given an initial health and safety induction relevant to their roles and activities undertaken within one week of the commencement of employment and will be advised of emergency procedures on their first day.

All employee records of HSEQ training or related competency requirements (relevant to their roles and activities) are held electronically via the departmental training matrices.

Supporting policies or procedures

POL-016 Training Policy IMP-005 Staff Training Associated HR Policies, Procedures and Processes

Accidents - Incidents Reporting and Investigations 9.

All incidents occurring within a Highway Care depot, site, or location where Highway Care employees are working will be report in accordance with the company incident reporting and investigation processes and procedure. In addition to incidents, all near miss and positive observations occurring within the aforementioned areas will also be reported.

All required HSEQ statutory reports will be made on behalf of the company by the HSEQ Team in liaison with the relevant Manager.

Only trained and competent persons will carry out investigations of HSEQ incidents, in liaison with the HSEQ Team.



IMP-048 Accident Incident Reporting Procedure IMP-052 First Aid Procedure

10. First-Aid

To comply with relevant legislation, Highway Care Limited will adopt, as a minimum, the levels of first-aid provision indicated in such legislation and or Approved Codes of Practice. Additional provision will be made where further need is identified.

The Controller of Premises is responsible for ensuring a sufficient level of first aid coverage and equipment in line with the first aid needs risk assessment.

 Supporting policies or procedures

 IMP-052 First Aid Procedure

 IMP-048 Accident Incident Reporting Procedure

11. Work Equipment (PUWER)

Highway Care Limited will ensure that all equipment provided for use at work is safe to use, maintained in accordance with manufacturer requirements and compliant with the requirements of relevant legislation.

Line management are responsible for ensuring that all work equipment hired, leased, or purchased for use by employees is suitable for its intended purpose and takes into consideration risk reduction features and best practice when reducing occupational health and safety risks.

Line management are responsible for ensuring that all work equipment within their control is correctly maintained/serviced in accordance with the manufacturer or best practice requirements. This may be undertaken in isolation or as part of a bigger company-wide agreed maintenance regime depending on the type of work equipment.

Line management are responsible for ensuring that defective (or presumed defective) work equipment is isolated or quarantined to prevent further use until such time that the work equipment can be sufficiently repaired and put back into service. Quarantined or isolated defective work equipment will be tagged or labelled as such to warn others not to use the work equipment as it is unsafe.

When selecting equipment, line management shall consider:

- Obtaining the most suitable work equipment for the planned task(s).
- The capabilities of the workforce and other human factors.
- The operational lifespan of the work equipment.
- Risk reduction features including occupational health risks.
- Compatibility with existing work equipment where required.
- Choose new or nearly new equipment, ensuring the avoidance of old continually repaired equipment.
- Ensure any machinery purchased has a relevant CE marking.
- Avoid procuring work equipment from outside the UK/EU without ensuring the supplier/manufacturer has correctly CE marked the equipment.

Contractors working on behalf of Highway Care Limited are responsible for ensuring that their work equipment meets the requirements of this policy.



Where work tools or equipment are issued to employees and / or persons working under their control, for their use, those employees are responsible for ensuring that the item is used in accordance with the manufacturer instructions and/or any training given and that any defects are reported to line management.

Supporting policies or procedures

POL-040 Vehicle Maintenance Policy IMP-053 Work Equipment (PUWER) IMP-022 Forklift Daily Checks

12. Lifting Equipment and Lifting Operations (LOLER)

Highway Care Limited understands the dangers that lifting operations and working with lifting equipment can pose to human life. They accept the duties and responsibilities passed on to it by relevant legislation in managing and protecting its workforce and others who may be affected by lifting operations and lifting equipment.

It is our policy no untrained or unauthorised persons are to carry out lifting operations or work with any form of lifting equipment.

All lifting operations must be planned and a lift plan produced covering the lifting operation and the load to be lifted. It is the responsibility of the Appointed Person (AP) to evaluate the lift plan and to sign each lift plan to demonstrate that the plan is fully developed and that the lift will be safe.

No lifting operations will occur unless there is a lift plan signed by a company AP.

AP's can only sign off lift plans for the lift types for which they have been trained and are competent to do so.

Line Management are responsible for arranging the purchase, inspection, maintenance, servicing, and use of lifting equipment within the workplace and ensuring lifting equipment is being managed within buildings that either Highway Care Limited owns, leases, or otherwise occupies.

Line Management are responsible for ensuring that any relevant lifting equipment thorough examinations, inspections or tests are to be carried out by a suitably qualified competent person.

Line Management are responsible for ensuring that their lifting equipment and lifting accessories have a valid thorough examination certificate and are tagged with the correct identification colour for the testing period to quickly identify any pieces that have lapsed. All lapsed equipment or accessories must be immediately quarantined and tagged to indicate that they are not to be used until such time a thorough examination can be carried out by a competent person.

Supporting policies or procedures

IMP-041 Lifting Operations IMP-053 Work Equipment LP series of Lift Plans

13. Hazard Identification and Risk Management

Highway Care Limited understands its responsibilities and legal duty to maintain a healthy and safe working environment for all its employees.

Hazard identification and risk management are the corner stones of ISO45001, and the other ISO systems to which we are accredited.



Line Management are responsible for ensuring that risk assessments are in place to cover the work activities under their control. Line Management will work with their employees and the HSEQ Team to develop suitable and sufficient risk assessments.

Employee involvement is a fundamental part of the risk assessment process.

Highway Care Limited's risk assessments follow the HSE's '5 steps to risk assessment' approach and pre-control and post control risks are evaluated using an industry accepted 5x5 severity/likelihood methodology. The risk assessments will also consider the human capabilities and other human factors when developing suitable control measures.

Line management are responsible for the timely review of their risk assessments after an incident, high potential near miss or ill health event investigation. In addition to this, all risk assessments must be reviewed at least once in a 2-year period.

Each Highway Care depot has its own emergency procedures, which have been developed by the Controller of that Premises and the HSEQ Team. All risk assessments and emergency procedures are accessible from the company intranet.

Supporting policies or procedures

IMP-015 Risk Management and Control Procedure IMP-039 Plant and Vehicle Management Plan Premises Risk Assessments

14. Control of Substances Hazardous to Health (COSHH)

Highway Care Limited understands and accepts its responsibility and legal duty to ensure that any purchase, use, storage, handling, and transportation at work of hazardous and / or dangerous substances are planned and are controlled by means of an assessment process. That suitable information is provided on the risks from hazardous and dangerous substances and the correct action to be taken when using them.

Line Management are responsible for ensuring that all substances within their remit that are hazardous to health or pose danger to human life or the environment are assessed prior to use and that all those who may be affected are provided adequate information and control measures to prevent that harm.

COSHH assessments for the substances that we use are available from the company intranet.

Supporting policies or procedures

IMP-055 Control of Substances (COSHH) Procedure COSHH Guidance

15. Fire Management

Highway Care Limited understands and accepts its responsibility and legal duty to ensure that the risks from fire are known, evaluated, and controlled using the risk assessment approach (see section 13) and to take suitable and sufficient general fire precautions to ensure the safety of our employees and others who may be affected by our activities.

For the purposes of the Regulatory Reform (Fire Safety) Order 2005, Highway Care Limited are deemed to be the 'Responsible Person' with the CEO having ultimate responsibility.



The 'Responsible Person' is supported by a 'Competent Person' for the provision of fire safety advice. Within Highway Care Limited that person is the HSEQ Coordinator, or an outside consultant should the HSEQ Coordinator in post not have the required competencies.

The Competent Person will produce a fire risk assessment for every Highway Care Limited owned, leased or rented depot location, site, or office. The fire risk assessment will be reviewed after a significant change and in any case at least once every 2 years.

The Responsible Person will endeavour at all times to minimise the danger and effect of fire. It will use the methods outlined in this policy and supporting procedures to do so.

Supporting policies or procedures

POL-005 Fire Management Policy Fire Risk Assessments for all locations IMP-066 Fire Management Procedure IMP-040 Detling Emergency Procedure IMP-054 Callow Emergency Procedure IMP-067 Grantham Emergency Procedure IMP-071 Denne Court Emergency Procedure

16. Lone Workers

Highway Care Limited understands its responsibilities and legal duty to maintain a healthy and safe working environment for all its employees.

Where the work arrangements are such that there is a foreseeable risk that employees are working alone then sufficient control measures must be implemented through the risk assessment process to ensure that those employees are kept safe.

Line Management are responsible for ensuring that all lone working activities are properly risk assessed and consider the type of work being undertaken, the risks posed by the work and the expected result should something were to go wrong. Control measures are required **before** lone working is undertaken and where the risks posed cannot be suitably controlled, then they are **prohibited**.

Certain high-risk activities are **prohibited** from being undertaken by a lone employee:

- Working at height
- Working in a confined space (as per the HSE definition of a confined space)
- Hot works
- Lifting operations

Supporting policies or procedures

IMP-057 Lone Working Procedure IMP-015 Risk Management and Control

17. Display Screen Equipment (DSE)

Highway Care Limited understands that the use of Display Screen Equipment (DSE) has the potential to cause harm to the user if not controlled and managed.



Highway Care Limited is committed to controlling this issue by ensuring the completion of a user assessment carried out at the workstation. All DSE users will carry out a self-assessed DSE risk assessment relevant to the equipment being used.

Once completed, the employee and the HSEQ Coordinator will identify any issues which have the potential to cause harm and address them together by providing competent advice on potential solutions.

It is the responsibility of the HSEQ Team to ensure that this process, as outlined above, is undertaken.

To aid in compliance and prevention of ill-health, all DSE users are entitled, and encouraged to undertake free eye examinations and, where identified for the specific use on DSE, free eye wear will be provided.

It is the employee's responsibility to ensure any issues regarding their DSE use are relayed to their Line Manager.

Supporting policies or procedures

IMP-058 Display Screen Equipment Procedure Display Screen Equipment Guidance

18. Occupational Road Risk

Highway Care Limited understands that its 'occupational road risk' is one of the highest risks facing the business due to the nature of the works that we undertake.

In addition to the legal requirements put upon it as a fleet operator, Highway Care Limited understands that it has a duty of care towards its employees who travel on behalf of the company.

Highway Care Limited are committed to the Fleet Operators Recognition Scheme (FORS) and have put in place a number of policies and procedures to ensure that our occupational road risk is sufficiently managed. The Transport Manager is responsible for the development, publication and communication of any Occupational Road Risk policies, procedures, or guidance.

Highway Care Limited operate a fleet of vehicles ranging from cars to HGVs. All company owned, leased, or rented vehicles will be maintained in accordance with the manufacturer's recommended service intervals and be road legal. Where this cannot be upheld then those vehicles are quarantined and declared 'VOR' (Vehicle Off Road).

Highway Care Limited will authorise and permit certain employees to drive company vehicles upon the completion of satisfactory licence and health assessments. Employee drivers are responsible for maintaining their own driving licence and for reporting any changes to their licence status (i.e., points, disqualifications, or restrictions) to their Line Manager and the Transport Manager immediately.

Drivers of company vehicles are responsible for carrying out routine checks as specified in the vehicle's documentation and the Driver's Handbook. They are responsible for reporting any defects that are hazardous or could prevent the vehicle from being roadworthy. No employee is permitted to drive a vehicle thus deemed not to be roadworthy.

Drivers of company vehicles are expected and informed to drive in a safe, non-aggressive and considerate manner in compliance with road traffic legislation. Care is to be exercised when carrying passengers on company business.

No person driving on company business will be expected to travel an excessive distance or to travel for an excessive time. Where necessary, support will always be given to sensible journey planning and for the costs of overnight accommodation. This will be monitored and enforced by Line Management.

Mobile phones or other electronic devices are not to be used 'Hand-held' whilst driving.



POL-013 Work Related Road Risk Policy POL-011 Smoke Free Workplace Policy POL-028 Counter Terrorism Policy POL-029 Driving Standards Policy POL-030 Fuel Emissions and Air Quality Policy POL-031 Health and Eyesight Policy POL-032 Induction Policy POL-033 In Vehicle Communication Policy POL-034 Load Safety Policy POL-035 Operational Security Policy POL-036 Regulatory Licencing Policy POL-037 Road Traffic Collisions Policy POL-038 Anti-Idling Policy POL-039 Tyre Management Policy POL-040 Vehicle Maintenance Policy POL-041 Vulnerable Road User Policy POL-043 Working Time and Driver's Hours Policy POL-044 Complaints Policy POL-045 Passenger Safety Policy IMP-019 Wheel Removal & Re-Fitting Procedure **IMP-025 Vehicle Maintenance Procedure** Driver's Handbook

19. Stress

Highway Care Limited places a high value on maintaining a healthy and safe working environment for all its employees and it recognises its duty of care extends to mental health as well as physical health at work. By implementing a stress management procedure, we aim to control or eliminate stress within the workplace. A risk assessment will be produced, where required, in the business to identify control measures which once implemented will actively remove or reduce the stressors identified.

Supporting policies or procedures

POL-012 Health Surveillance Policy

Associated HR Policies, Procedures, and process Occupational Health Procedure

20. Drugs and Alcohol

Alcohol and drug misuse detrimentally affect the abilities of the individual to carry out their duties in a safe and competent manner, thus increasing the risks to themselves and others.

It is the intention of Highway Care Limited that any instance of a worker found to be under the influence of alcohol or drugs will be deemed as gross misconduct and subject to strict disciplinary action.

However, Highway Care Limited accepts an individual's dependence on alcohol or drugs is an illness and the same provisions and treatments will be given in these cases as to any other illness.



POL-006 Drugs and Alcohol policy

Associated HR Policies, Procedures, and process Occupational Health Procedure

21. Contractual Duties and Contractors

Highway Care Limited will be required, at times, to employ contractors during its operations or when managing our fixed locations. When required we will ensure that they are competent to carry out such tasks in a safe and effective manner.

We understand that it is the responsibility and duty of Highway Care Limited to control and monitor the work activities of the contractors and communicate and inform on matters of health and safety. We achieve this by using our supplier assessment and contractor management procedures. The primary responsibility in managing contractors will rest with the contractors Hiring Manager.

Supporting policies or procedures

IMP-059 Contractor Management Procedure Supplier Evaluation Form

22. CDM

Highway Care Limited may undertake certain roles under the CDM Regulations depending on the type of work being undertaken and its location.

Operations

For our operational works Highway Care Limited usually undertakes the role of Contractor, reporting to a Principal Contractor on site. Our operational documents are submitted to the Principal Contractor ahead of the planned works in order for them to integrate them into their Construction Phase (Health and Safety) Plan(s).

Whilst Highway Care Limited will install our barrier products, the design for the installation is provided by the Principal Designer/Principal Contractor and are classed as temporary works.

Depots

Within our depots there may be times where we require work to be done on or within our buildings by contractors specialising in the work required.

Only authorised contractors who have been vetted and added to our supply chain will be used. Furthermore, where the work falls into scope of the CDM Regulations then Highway Care Limited will appoint a Principal Contractor, Principal Designer or Contractor in writing. This letter will acknowledge the roles being undertaken by each party. Without such letter, Highway Care Limited will act as the Principal Contractor.

Supporting policies or procedures

Operational RAMS/Lift Plans CDM Role Appointment Letter IMP-059 Contractor Management Procedure Supplier Evaluation Form

23. Electrical Safety

Highway Care Limited understands the dangers that electricity and working with electricity can pose to human life. We accept the duties and responsibilities passed on to us by relevant legislation in managing and protecting our workforce and others who may be affected by electricity.



It is our policy no untrained or unauthorised persons are to work on any form of live electrical equipment where there is a significant or high risk of electrocution or injury as a result.

Managing the purchase, inspection, maintenance, servicing, and use of electrical items within the workplace and ensuring electrical wiring systems / supply is being managed within buildings that either Highway Care Limited owns, leases, or otherwise occupies for day-to-day business activities is the responsibility of Line Management.

PAT

Portable Appliance Testing (PAT) is one way of demonstrating compliance with the Electricity at Work Regulations. All portable electrical appliances will be PAT tested **annually** by a competent person or organisation.

Fixed wiring

Where required to under existing ownership, lease or rental*, Highway Care Limited will arrange for the testing of fixed wiring with the buildings that it occupies at a frequency no greater than:

- 3 years for industrial buildings, or where the condition of the circuits dictate such a testing frequency.
- 5 years for offices and commercial buildings, or where the condition of the circuits dictate such a testing frequency.

Testing will be undertaken by a competent person or organisation in accordance with the requirements of BS 7671 (Wiring Regulations).

* In some of our depots, the Landlord or Agent is responsible for fixed wiring inspections.

Supporting policies or procedures IMP-060 Electricity at Work Procedure Guidance on Electricity at Work

24. Working at Heights

Highway Care Limited understands the dangers that working at height can pose to human life. We accept the duties and responsibilities passed on to us by relevant legislation in managing and protecting its workforce and others who may be affected by working at height activities.

It is our policy no untrained or unauthorised persons are to carry out working at height activities or work with any form of access equipment and or working platform where there is a significant or high risk of injury or damage as a result.

Ladders

Ladders are permitted to be used for short duration work - work taking less than 20 minutes to achieve, where three points of contact can be made, and the user does not work outside the footprint of the ladder (i.e., no extended reaching). Ladders are required to be kept in a controlled state such that only authorised users can access them and that routine visual inspections are undertaken formally (12 weeks) and by the user before each use. All ladders, stepladders, podiums, and step units are required to have a ladder tag card installed, to identify the ladder and to show a record of formal inspections.

Only Class 1 or EN131 ladders may be used on Highway Care Limited sites/depots. Wooden ladders are prohibited.

Vehicles

Vehicles are fitted with built-in steps or ladder units and are accompanied by handrails placed at strategic points. All handrails are painted yellow for clear identification and allow the operator to maintain three points of contact when ascending or descending from a vehicle.



Trailers

Highway Care Limited operate a fleet of trailers to transport our VRS barrier to and from our client sites. The trailers are fitted with a proprietary trailer frame, which incorporates a raised access platform (called a Crow's nest) and a fall arrest rail. All employees who are required to work from the trailer are required to maintain three points of contact when ascending and descending the trailer and are required to wear a harness and a fall arrest block, connected to the fall arrest rail once on the trailer.

Other

Other working at height equipment may be used from time to time at our depots. This can include scaffolding or Mobile Elevated Work Platforms (MEWPS). Only a competent person or organisation can erect scaffolding and where sited, the scaffolding must be inspected by a competent person at least once per week. The use of a MEWP will only be undertaken by a trained and competent person. Competency can be demonstrated by the operator holding an appropriate class IPAF card.

The relevant Line Managers shall manage the purchase, inspection, maintenance, servicing, and use of access equipment and or working platform within the workplace.

Any access equipment and or working platform, inspection and testing must be carried out by a qualified competent person.

All working at height activities must be accompanied by a risk assessment. The relevant Line Managers are responsible for ensuring risk assessments are in place and may require the input from their employees and/or the HSEQ Team.

Supporting policies or procedures

IMP-043 Working at Height Procedure

25. Asbestos

Highway Care Limited understands the dangers that asbestos fibres pose to human life. We accept the duties and responsibilities passed on to it by relevant legislation in managing and protecting its workforce and others who may be affected by asbestos.

Managing or ensuring asbestos is being managed within buildings that either Highway Care Limited owns, leases, or otherwise occupies for day-to-day business activities is the responsibility of the Controller of Premises for that site.

We presume the presence of asbestos within premises / sites until otherwise confirmed by a competent person.

Supporting policies or procedures IMP-061 Asbestos Management Procedure

26. Smoking

It is the policy of Highway Care Limited that smoking is prohibited in all offices, company vehicles and enclosed workplaces. Responsibility for enforcement of smoking controls lies with the appropriate Manager.

Supporting policies or procedures

POL-011 Smoke-free Workplace Policy



27. Manual Handling

Highway Care Limited understands the risk of injury presented by manual handling operations. Where possible Highway Care Limited will eliminate the need for manual handling operations, where this is not possible these operations will be assessed, and significant findings recorded.

All employees are to undergo basic training in manual handling activities and more detailed and specific training will be undertaken by those identified in need. The relevant manager is responsible to ensure that suitable and sufficient assessments are in place to adequately control manual handling activities.

Supporting policies or procedures

IMP-062 Manual Handling Procedure Manual Handling Guidance Manual Handling Assessment

28. Confined Spaces

Highway Care Limited acknowledges the dangers to life when carrying out its activities in confined spaces.

Highway Care Limited will ensure before any activities are carried out within confined spaces a suitable and sufficient risk assessment is carried out and the activity is planned, carried out and led by trained and competent persons. All those planning and carrying out confined spaces activities will have undergone specific training in this type of activity and work to the practices prescribed in all relevant legislation and Approved Codes of Practice. The Line Managers in charge of such activities will ensure that this is carried out.

Supporting policies or procedures

IMP-063 Confined Space at Work Procedure

29. Visitors

We endeavour to ensure that all those who visit our offices or site locations, and their health and safety are not compromised at any time. All visitors to Highway Care Limited will be escorted always by an employee of Highway Care Limited and be made known of any foreseeable significant risks before they undergo their visit. All visitors will report to Highway Care Limited Reception/s to sign in / out.

Supporting policies or procedures	
IMP-040 Detling Emergency Procedure	
IMP-054 Callow Emergency Procedure	
IMP-067 Grantham Emergency Procedure	
IMP-071 Denne Court Emergency Procedure	

30. Personal Protective Equipment

Situations will exist where, despite implementing reasonably practicable precautions to eliminate or minimise hazards to employees, Personal Protective Equipment (PPE) will be necessary to safeguard the health, safety, and welfare of employees.

Highway Care Limited, through their line managers, will provide suitable and sufficient PPE where a risk assessment has identified it as a 'last resort' to protect against risks to health and safety. Engineering controls and safe systems of work to remove the risk will always be considered first.



IMP-046 PPE Procedure

31. Occupational Health

Highway Care Limited places a high value on maintaining a healthy and safe working environment for all its employees and / or others. We are committed to ensuring that the potential for ill health arising from activities or premises controlled by Highway Care Limited or exposed to as a result of activities carried out by Highway Care Limited, are minimised at source to the lowest level that is reasonably practicable.

Highway Care Limited recognises the importance of integrating the continuous improvement of health and wellbeing into the organisational activities and will aim to ensure early identification and management of occupational ill health ranking it equal with other operational considerations.

Highway Care Limited will provide internally or obtain externally competent specialist occupational health advice, assistance, and services to all its employees.

Supporting policies or procedures

POL-012 Health Surveillance Policy

32. Emergency Preparedness

Managers shall ensure through communication, participation, and consultation that employees understand what to do in case an emergency situation arises. The business will take all reasonable steps to identify all possible types of emergencies or system failure that could occur and prepare contingency plans to deal with such incidents.

Where such incidents could lead to a major incident the business will brief the emergency services and work with them to ensure that these plans are compatible and adequate. The business will document such plans and test their effectiveness on a regular basis through exercise and review. All employees shall ensure they understand the procedures for reporting Emergency Incidents.

Supporting policies or procedures

IMP-015 Risk Management and Control Procedure

IMP-048 Accident Incident Reporting Procedure

IMP-040 Detling Emergency Procedure

- IMP-054 Callow Emergency Procedure
- IMP-067 Grantham Emergency Procedure
- IMP-071 Denne Court Emergency Procedure

33. Workplace Environment and Plant & Vehicle Management

Highway Care Limited's Controller of Premises are responsible for the development and maintenance of a sitespecific vehicle management plan for their site. Such plans will include designated safe paths for pedestrians and suitable crossing points across vehicle paths.

Site employees are responsible for adhering to any indicate safe walking path around the depot or site and for reporting any events or near misses that may occur.

Hazards shall be identified, reported, and immediately controlled through regular inspections and audits and diligence by all working within the workplace.



IMP-064 Compliance Management Procedure

- IMP-015 Risk Management and Control Procedure
- IMP-039 Plant and Vehicle Management Plan

34. Noise

It is the responsibility of Line Managers to identify, through their risk assessments, any work activities where noise is present and to work with their employees and the HSEQ Team in establishing the noise levels present. Once the noise levels have been identified then the application of the risk control hierarchy can be undertaken. Where the noise cannot be eliminated at source, then measures are taken to reduce the noise level.

Where the noise levels cannot be reduced then PPE is required. Ear defenders are used to mitigate the noise levels and are selected to work with other PPE such as hard hats. Where the wearing of hearing protection is required, then Line Managers are responsible for communicating this to their employees and to ensure that such PPE is available. In our fixed locations, mandatory hearing protection signage is posted in high noise areas.

All safety critical roles are required to undertake a safety critical medical at least every 3 years, which includes an audiometry test.

35. Vibration

It is the responsibility of Line Managers to identify, through their risk assessments, any work activities where vibration is present and to work with their employees and the HSEQ Team in establishing the vibration levels present. Excessive exposure to high vibration levels can lead to occupational diseases such as Hand Arm Vibration Syndrome (HAVS).

The most common route of HAVS transmission is through the hands, wrists, and arms where there is a direct contact with a vibrating source.

Highway Care Limited recognises this hazard through a comprehensive risk assessment process. To support our assessments, we use the Reactec system to record vibration exposure in real time, giving an alert when an employee has reached a cumulative number of points. Our aim is to limit the exposure to our employees to 100 points (2.5m/s² A8). There is an absolute limit of 400 points per employee per shift/day (5.0m/s²).

All safety critical roles are required to undertake a safety critical medical every 3 years, which includes a test for the symptoms of HAVS.

Supporting policies or procedures	
POL-012 Health Surveillance Policy	
IMP-045 Control of Vibration Procedure	
IMP-015 Risk Management and Control Procedure	

36. Young Persons

Highway Care Limited recognises that for many young people the workplace will be a new environment and they will be unfamiliar with 'obvious' risks and the behaviour expected of them in response. A young person is defined as someone between the ages of 16 and 18 years old.

To that end Line Management are responsible for providing suitable supervision for any young person within their remit.



Young people might need additional support to allow them to carry out their work without putting themselves and others at risk, and this might mean more tailored training and/or closer supervision. Regularly checking a young person's progress will help identify where any additional adjustments may be needed.

Certain activities and equipment present a higher risk to young people and therefore these will remain prohibited activities within Highway Care Limited, namely:

- Confined space working
- Hot works
- Working at height
- Lifting operations
- Use of fabrication tooling (unless as part of an apprenticeship and under one-to-one supervision)
- Working in the workshop (unless as part of an apprenticeship and under one-to-one supervision)

Supporting policies or procedures

IMP-015 Risk Management and Control Procedure Managing Young Persons Guidance

37. Inductions

Induction is an essential part for new recruits and familiarising them with Highway Care Limited. As an employer, Highway Care Limited understands our staff are our most important asset.

Induction gives us the chance to welcome new employees and build on their positive attitude and enthusiasm for their new job.

It's an opportunity to familiarise new members of staff with our organisation and to introduce them to their immediate colleagues and other members of the wider workforce and our organisation's policies on areas such as health and safety, equality, and discrimination.

All new employees will undertake the company induction, which involves a structured programme and includes vital health and safety information.

Every new employee will receive a job/department specific induction, inducting the new employee in the role specifically.

Supporting policies or procedures Associated HR Policies, Procedures and Process POL-016 Training Policy

Induction forms (employees and Contractors)

38. Overseas Travel

Highway Care Limited is required to manage and assess the additional risks that may be presented by staff travelling and working overseas and ensure Line Management are managing those staff and activities sufficiently.

All overseas travel is notified to the HSEQ Team at least 10 days in advance so that background information can be checked, and the risks presented by the travel are accurately assessed.

To assist in the procedure a number of reliable sources of information are used. These include, but not limited to:

- UK Foreign Commonwealth Office (FCO)
- AIG (Travel insurance support service)



Copies of all travel notifications are held electronically and act as a reference should emergency contact be required.

Supporting policies or procedures	
IMP-065 Travelling & Working Overseas Procedure	
GUI-65 Travelling Abroad Guidance	
Managing Employees Overseas Guidance	
MSF-025 Travel Notification forms (employees only)	



39. Declaration

I have read and understand my responsibilities for health and safety.

I am aware that if I fail to follow the rules and procedures within this policy, I could be committing a criminal offence, and this could lead to disciplinary action, not excluding dismissal.

Print Name:	
Signed:	
Date:	

When complete, remove **this page only** and return to your Line Manager.