



Health and Safety Policy Manual

HSPOL001/01/0423
Last Reviewed: 04/2023
Page 1 of 17
Owner: David Hopley

This Health and Safety Policy it is not an exhaustive list of all the hazards and risks that may be present in your workplace. It is the responsibility of the organisation to ensure this policy is reviewed periodically and/or following a significant change to ensure it remains compliant with legislation. The Policy should be read in conjunction with any separate policies and procedures provided for the health, safety and welfare of employees and those affected by your work activities.

Contents

1	Policy Statement	3
2	Scope.....	3
3	Duties and obligations.....	3
4	Organisation and Responsibilities.....	4
4.1	Managing Director.....	4
4.2	Directors and Department Heads.....	4
4.3	Employees	4
4.4	Fire Marshals	5
4.5	First Aiders and Emergency First aiders	5
5	Arrangements.....	5
5.1	Risk Assessment	5
5.2	Fire Safety.....	6
5.3	Information, Supervision and Training	7
5.4	Communication and Consultation	7
5.5	Accident Investigation and Reporting	7
5.6	First Aid	8
6	Accident, Incident and Ill-Health Recording, Reporting and Investigation	8
6.1	Control of Premises & Welfare.....	8
6.2	Slips, Trips and fall.....	8
6.3	Smoking.....	9
6.4	Work Equipment	9
6.5	Display Screen Equipment.....	9
6.6	Electricity.....	10
6.7	Gas Safety.....	10
6.8	Manual Handling	11
6.9	Hazardous Substances.....	11
6.10	Asbestos	11



Health and Safety Policy Manual

HSPOL001/01/0423
Last Reviewed: 04/2023
Page 2 of 17
Owner: David Hopley

6.11	Work At Height.....	11
6.12	Personal Protective Equipment.....	12
6.13	Occupational Driving.....	12
6.14	New and Expectant and Nursing Mothers.....	12
6.15	Lone Working.....	13
6.16	Employee Security.....	13
6.17	Visitors and Members of the Public.....	13
6.18	Disabled Persons.....	14
6.19	Contractors.....	14
6.20	Waste Management.....	14
6.21	Stress.....	14
6.22	Indoor Environment.....	15
7	Monitoring and Review.....	15
7.1	Proactive monitoring.....	16
7.2	Reactive monitoring.....	16
7.3	Review.....	16
8	Organisation Safety Rules.....	16
9	Rules Covering Gross Misconduct.....	17
10	Related Documents.....	17
11	Policy Review.....	17

Millbank Holdings Group Ltd (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h2 style="color: #008080;">Health and Safety Policy Manual</h2>	HSPOL001/01/0423
		Last Reviewed: 04/2023
		Page 3 of 17
		Owner: David Hopley

1 Policy Statement

Millbank Holdings is committed to ensuring the health, safety and welfare of its employees and those affected by its undertaking and it will, so far as is reasonably practicable, establish procedures and implement arrangements to comply with our statutory obligations.

This Health and Safety Policy Manual has been prepared in accordance with the requirements of the Health and Safes at Work Act 1974. It defines how we will manage the health and safety risks associated with our business, premises and activities and follows the principles of ‘plan, do, check and act’. It will be signed and delivered by the Managing Director.

Millbank Holdings will implement a systematic and pro-active approach to health and safety management ensuring that foreseeable risks are assessed and control measures are communicated effectively to those affected. We will also measure our performance to ensure that continual improvement can be achieved and that employees, visitors and members of the public and others can benefit from the efforts made.

2 Scope

This policy applies to all employees regardless of service, contract or position.

3 Duties and obligations

Millbank Holdings recognises that it has a legal duty of care towards protecting the health and safety of its employees and others who may be affected by the organisation’s activities.

As part of that commitment, we will:

- maintain the workplace in a safe condition and provide adequate facilities and arrangements for welfare at work;
- provide a safe means of access to and egress from the workplace;
- identify and adequately control health and safety risks arising from our work activities;
- provide and maintain equipment and systems of work that are safe;
- make arrangements for ensuring health and safety in connection with the use, handling, and storage of hazardous substances;
- ensure the workplace is clean and tidy and measures are taken to control the spread of infection;
- ensure all contractors who undertake work on our premises adhere to safe systems of work;
- safely and responsibly dispose of all waste generated through our activities;
- provide such information, instruction, training and supervision as is necessary to ensure the health and safety at work of its employees and other persons;
- consult with employees regarding health and safety matters; and
- undertake continual monitoring and review of our performance to improve standards further, if employees/contractors wish to abort work on the grounds of Health and Safety;
- fire and security arrangements exist and are maintained to meet legal requirements to exercise loss control;
- arrangements for first aid provision in the office and on site are suitable and sufficient to meet the first aid needs of employees;
- managers demonstrate to employees our care for them and their safety, health and welfare;
- suitable personal protective equipment is provided free of charge for all staff/contractors exposed to a risk to their health and safety whilst at work.

Millbank Holdings Group Ltd (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h2 style="color: #008080;">Health and Safety Policy</h2> <h3 style="color: #008080;">Manual</h3>	HSPOL001/01/0423
		Last Reviewed: 04/2023
		Page 4 of 17
		Owner: David Hopley

4 Organisation and Responsibilities

This part of our policy describes how Millbank Holdings is organised to manage health and safety and provides a clear understanding of individuals' areas of responsibility.

4.1 Managing Director

Overall responsibility for health and safety rests with David Hopley, Managing Director who shall:

- ensure a safe place of work and provide adequate resources to execute this policy; and
- ensure this policy is brought to the attention of all employees within the business.

David Hopley may delegate responsibility for the delivery of the health and safety policy, but will remain accountable for the actions or inactions relating to this policy & contents therein.

4.2 Directors and Department Heads

All Directors and Department Heads shall:

- ensure that all health and safety duties delegated to them are undertaken in line with this policy;
- ensure that the contents of this policy are brought to the attention of the persons under their control and that regular consultation with employees takes place;
- ensure all risks presented to employees and others are identified and appropriate risk controls are implemented and properly communicated;
- identify training needs commensurate with the risk identified and provide adequate training and supervision to ensure that all employees are competent;
- carry out periodic health and safety inspections of the workplace and equipment to ensure that all necessary controls are in place and being adhered to;
- ensure that all contactors operating under their control are properly controlled and where necessary permits issued; and
- investigate, report (to the HSE where applicable) and record accidents and implement measures to ensure that corrective action is taken to prevent recurrence

4.3 Employees

Every employee shall:

- take reasonable care of their own safety and that of any person affected by their actions or inactions;
- cooperate with their employer in all matters relating to health and safety;
- attend training sessions where required and adhere to all safe systems of work implemented by the organisation;
- use equipment in accordance with the organisation and the manufacturer's instructions;
- report all hazards and / or accidents to allow management to investigate and implement controls where required;
- ensure that PPE clothing & equipment is used as directed;
- ensure that all infection control procedures are followed; and
- report any unsafe conditions and defective equipment to their manager or reception

Millbank Holdings Group Ltd (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h2 style="color: #008080;">Health and Safety Policy Manual</h2>	HSPOL001/01/0423
		Last Reviewed: 04/2023
		Page 5 of 17
		Owner: David Hopley

4.4 Fire Marshals

Millbank Holdings has appointed certain employees to act as fire marshals. These employees have additional duties in accordance with fire safety legislation:

The list of approved fire marshals can be found on the notice board and in the employee induction pack.

They shall:

- carry out fire safety preventative checks in areas under their control;
- coordinate the evacuation of the premises in the event of an emergency situation

All employees assuming these responsibilities will be given specific training on appointment and refresher training on a regular basis.

4.5 First Aiders and Emergency First aiders

Millbank Holdings has appointed certain employees to act in capacity of first aiders and emergency first aiders

The First Aiders and Emergency First Aiders shall:

- take charge when someone falls ill or is injured, including calling an ambulance if required; and
- look after and maintain the first aid box and its contents
- complete the accident book following an accident

5 Arrangements

This part of our policy describes the arrangements in place to provide a safe and healthy working environment.

5.1 Risk Assessment

Millbank Holdings understands that risk assessments are the foundation of an effective safety management system. We will carry out a general risk assessment and where necessary produce specific risk assessments that will be suitable and sufficient. A record of any significant findings will be made.

Risk assessors will work in conjunction with any other person that may offer expertise within that particular area to ensure that the risk assessments are suitable and sufficient and in line with relevant legislation. The risk assessment findings will be brought to the attention of all employees through the most effective means. When undertaking risk assessments, the following hierarchy of risk control measures will apply:

- Eliminate the risk where possible
- Reduce the risk or substitute for a less hazardous alternative
- Isolate and/or segregate the hazard from the person
- Procedural arrangements including systems of work
- Personal protective equipment

Managers shall ensure risk control measures are implemented. Risk assessments will be reviewed at regular intervals or whenever there is a change in circumstances that undermines the validity of the assessment.

Millbank Holdings Group Ltd (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h2 style="color: #008080;">Health and Safety Policy</h2> <h3 style="color: #008080;">Manual</h3>	HSPOL001/01/0423
		Last Reviewed: 04/2023
		Page 6 of 17
		Owner: David Hopley

5.2 Fire Safety

Fire is a significant risk in the workplace and we take our fire safety duties seriously. As such we have developed this policy and arrangements to ensure we protect people from the risks of fire and comply with our legal requirements under fire safety legislation. We will ensure that the provision of fire safety is adequate and meets the needs of not only the employees to work within the organisation but also any member of the public, contractors or visitor present within the premises.

Millbank Holdings will ensure:

- a Responsible Person is appointed and authorised to complete their duties in accordance with fire safety legislation;
- a current, suitable and sufficient Fire Risk Assessment is produced by competent persons, made available and reviewed periodically;
- all employees receive training and instruction on all of the fire and emergency procedures including those with special responsibilities (Fire Marshals/Wardens);
- a weekly test of alarm is carried out and logged and that all employees are made aware of the testing regime;
- all electrical equipment is maintained and inspected;
- the alarm is serviced periodically by competent personnel, and that emergency lighting is tested periodically;
- a planned / unplanned fire evacuation drill is undertaken at intervals of no more than six months, and any issues noted during the evacuation are addressed;
- a weekly management check of fire routes, fire doors, fire extinguishers and general housekeeping is undertaken and logged and any defects actioned; and
- fire extinguishers are provided and serviced periodically and located as per the fire risk assessment

A current, suitable and sufficient Fire Risk Assessment will be produced by competent persons, made available and reviewed periodically. This process will be overseen by the Group Business Support Manager.

All employees are also expected to co-operate fully with us in complying with any fire precaution procedures that we may introduce as a measure to protect the safety and wellbeing of our employees and visitors. All employees have a responsibility to make sure they are familiar with the layout of the building, noting where fire exits are and where they lead to. They must also ensure the correct use of fire doors, that all fire exits and evacuation routes are clear at all times and that no flammable materials are stored in corridors or on stairs.

We will keep employees informed of any changes that are made to our fire safety procedures and the Fire Risk Assessment. We will also ensure that all visitors to our premises are briefed on the evacuation procedure.

Records of training, induction, drills, alarm tests, fire certification are to be kept on the premises and up to date in the fire control log book. Supervision and monitoring of visitors, including contractors will be carried out by designated persons. Precautions in respect of disabled people will be implemented.

These arrangements will be reviewed at least annually and on any significant change in the business or the premises. Improvements and alterations may be carried out, following advice from the Fire Prevention Officer, our insurers, or our safety advisor.

Millbank Holdings Group Ltd (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h2 style="color: #008080;">Health and Safety Policy Manual</h2>	HSPOL001/01/0423
		Last Reviewed: 04/2023
		Page 7 of 17
		Owner: David Hopley

5.3 Information, Supervision and Training

All employees will be provided the necessary instruction, training and supervision in order to carry out their duties safely and without presenting a risk to themselves or any other person affected by their undertakings. Employees will receive health and safety training on induction and refresher training at intervals determined by Millbank Holdings. Training will include but not be limited to:

- hazard spotting and risk control measures;
- fire safety awareness and emergency procedures;
- safe operation of equipment; and
- accident, incident and near miss reporting

Job specific training will be provided as necessary.

All training records will be retained by Millbank Holdings.

5.4 Communication and Consultation

Millbank Holdings will communicate and consult with employees on issues affecting their health and safety and take account of their views. Effective communication and consultation will be achieved through:

- individual conversations
- notice boards
- employee meetings
- e-mails

Each site will display the 'Health and Safety Law – What You Need To Know' poster and/or communicate similar information by other means.

5.5 Accident Investigation and Reporting

Millbank Holdings requires employees to report all accidents / incidents / near misses as they occur, and will ensure that they are investigated to establish the causes and recommend any actions to rectify and prevent recurrence.

It is the responsibility of the Department Heads and HR to investigate all accidents including those involving members of the public, visiting personnel or contractors, and to share the findings of the investigation where necessary with enforcing authorities and insurers:

- All accidents resulting in any reportable injury or losses of any assets
- All accidents, however minor
- All near-misses and close calls.

Employees should be aware that Health and Safety Enforcement Officers can enter our premises and visit work sites without an appointment, at any reasonable time, to ascertain if the requirements of the law are being met. If they have reason to believe that a situation exists or may arise in which there is potential for serious injury or death, they may enter work premises or sites at any time.

We will extend to them full co-operation.

We will co-operate with our insurers, in order to reduce our premium as far as we can.

If the insurers have any advice on reducing risk, we will follow that advice where reasonably practicable.

Millbank Holdings Group Ltd (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h2 style="color: #008080;">Health and Safety Policy Manual</h2>	HSPOL001/01/0423
		Last Reviewed: 04/2023
		Page 8 of 17
		Owner: David Hopley

5.6 First Aid

Management responsibility

Management responsibility for all first-aid functions is held by the Managing Director, who will be responsible for promoting and implementing the policy, together with allocating, or obtaining allocation for sufficient finance from the Board to enable it to be implemented. He will also be responsible for:

- Reporting notifiable accidents to the appropriate authority
- Encouraging employees to take training in first-aid, or as an appointed person
- Authorising refresher training, as required.

Millbank Holdings will make sufficient provision for first aid to deal with accidents and injuries that arise at work. Nominated employees will be trained to administer first aid in their capacity as First Aiders and/or nominated persons as determined by the requirements of the relevant first aid regulations.

An adequately stocked first aid box will be held on site and notices displayed will indicate its location and who can provide assistance.

6 Accident, Incident and Ill-Health Recording, Reporting and Investigation

All accidents resulting in personal injury must be recorded in Millbank Holdings' Accident Book, which is located in the reception.

Incidents and work-related ill-health must be reported directly to your manager whereupon they will be investigated. Should you require first aid treatment, please contact the nominated first aiders & emergency first aiders whose details are provided below:

Details of all first aiders and emergency first aiders can be found on the notice boards.

6.1 Control of Premises & Welfare

Millbank Holdings will ensure so far as is practicable and in line with any contractual agreements that may exist between landlord and tenant that the premises are fit for purpose and pose no undue risk to the employees, members of the public and others who visit the premises. This includes:

- safe access to and egress from the premises including in emergency situations;
- maintaining a clean and hygienic workplace;
- ensuring adequate facility is provided for hot water washing and toilets;
- providing suitable facilities for rest periods and breaks;
- providing safe work equipment which is fit for purpose; and
- ensuring comfortable working temperatures and adequate ventilation

6.2 Slips, Trips and fall

The most common cause of injury in the workplace is slips, trips and falls. Hazards include trailing cables, boxes, materials and spillages. You must remain attentive to any slip or trip hazards on the premises and maintain good-housekeeping standards at all times. Make sure passageways are free from trip hazards and never obstruct a fire exit. If a spillage occurs you must ensure it is attended to without delay. We expect all employees to take personal responsibility for their immediate work areas and not create hazards for themselves or others.

Millbank Holdings Group Ltd (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h2 style="color: #008080;">Health and Safety Policy Manual</h2>	HSPOL001/01/0423
		Last Reviewed: 04/2023
		Page 9 of 17
		Owner: David Hopley

6.3 Smoking

It is the policy of Millbank Holdings that all of its premises are smoke-free and that all employees have a right to work in a smoke-free environment. Smoking is prohibited throughout the entire workplace with no exceptions and this includes the use of all artificial smoking aids (electronic or otherwise). This includes company vehicles. Failure to comply with this policy will result in disciplinary action that can lead up to and include dismissal.

6.4 Work Equipment

Millbank Holdings will ensure that all work equipment provided for use at work is:

- obtained from a reputable source;
- safe to use and fit for purpose;
- maintained and inspected as necessary; and
- stored securely and safeguarded from unauthorised access

Employees will receive adequate information, instruction and training and must not use any work equipment without such. Any defective work equipment must be taken out of use and reported to Reception. Office equipment will be subjected to annually portable appliance testing. Ladders for use in stores shall undergo visual inspection which shall be recorded.

6.5 Display Screen Equipment

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

Display screen operators may suffer from postural difficulties and visual fatigue, although DSE's do produce some radiation, the levels produced are no more than those from the environment in many areas.

Postural hazards result from poor ergonomics and working environment. The following may produce fatigue-related conditions:

- Sitting in an immobile position for long periods
- High rates of repetitive finger movements, with the wrists bent
- Poor circulation to the legs
- Pressure from the seat/chair upon the thighs.

Visual fatigue may result from the following:

- Poor screen display, such as low contrast or flickering
- High levels of ambient light compared to the screen display
- Reflections or glare

These can produce eye strain, headaches or other related symptoms.

We will arrange for free eye tests when requested and arrange for the supply of any corrective appliances (glasses or contact lenses) where these are required specifically for working with DSE.

Millbank Holdings will:

- carry out an assessment of each user's workstation;
- implement necessary measures to remedy any risks; and

Millbank Holdings Group Ltd (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h2 style="color: #008080;">Health and Safety Policy</h2> <h3 style="color: #008080;">Manual</h3>	HSPOL001/01/0423
		Last Reviewed: 04/2023
		Page 10 of 17
		Owner: David Hopley

- provide adequate information and training to persons working with DSE and how risks to health are to be avoided

Employees must comply with the instructions and training given regarding safe workstation set-up and use, the use of the equipment provided, and take regular breaks or changes of activity. Employees with a disability, health condition or who are suffering from discomfort which may affect their ability to work using DSE must inform their line manager.

6.6 Electricity

All reasonable steps will be taken to secure the health and safety of employees who use electrical equipment. Millbank Holdings will ensure:

- electrical installations and equipment are installed in accordance with the Wiring Regulations published by the Institution of Engineering and Technology (IET)
- fixed installations are in a safe condition and routinely tested; and
- all portable and transportable equipment is inspected and tested

Employees must visually check electrical equipment for damage before use and report any defects found to Reception.

All our first-aiders are trained in the treatment of electrical shock. If there is any accident involving electricity, a qualified first-aider should be summoned immediately.

The Group Business Support Manager holds an inventory of all electrical equipment on the premises and will keep this up to date with the assistance of departmental managers.

Employees must not carry out any repair to any electrical item unless qualified to do so or bring any electrical item onto the premises until it has been tested. Electric cables should be arranged in such a position that they do not cause a tripping hazard or be subject to damage.

6.7 Gas Safety

In order to secure the health and safety of employees, Millbank Holdings will ensure that all installation and maintenance on the gas installation, flue or boiler appliance will only be carried out by a competent, Gas Safe Register registered person.

Millbank Holdings will:

- determine the location of all gas pipe work, fittings, storage vessels and appliances and record them on a building diagram, with a copy near the primary meter
- ensure that all of the above are subject to annual safety checks by a Gas Safe Register registered person
- ensure that suitable and sufficient records are kept and that tenants have copies
- ensure that all gas installations within the premises comply with the requirements of the Gas Safety (Installation and Use) Regulations 1998
- ensure that all gas appliances are safe and any that are not are repaired or removed from the premises
- ensure that any gas leaks are reported to the supplier as soon as they are noticed and that any consequent supply disconnection is not restored until the fault is properly remedied.

Millbank Holdings Group Ltd (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h2 style="color: #008080;">Health and Safety Policy Manual</h2>	HSPOL001/01/0423
		Last Reviewed: 04/2023
		Page 11 of 17
		Owner: David Hopley

6.8 Manual Handling

Where practicable the need for manual handling will be eliminated. However, when it is necessary the Directors and Department Heads will assess the risk to all employees arising for any identified manual handling tasks and to:

- eliminate the task where possible
- reduce the load to be handled if elimination is not possible;
- provide apparatus and equipment to handle the load;
- provide adequate instruction and training in lifting techniques;
- employees who are not employed for manual handling operations will not be allowed to carry them out without suitable and sufficient training.

6.9 Hazardous Substances

The Control of Substances Hazardous to Health Regulations 2002 applies to our working environments.

We recognise that some substances have the potential to cause ill health and we will introduce measures to identify what substances our employees use or are exposed to in the course of their work.

It is the responsibility of the Group Business Support Manager, to ensure that:

- the Control of Substances Hazardous to Health Regulations 2002 (COSHH) applies to our working environment
- all hazardous substances (COSHH) are identified and adequately controlled;
- appropriate PPE is available for employees where applicable;
- correct, lockable storage and segregation is provided; and
- good personal hygiene is practiced

6.10 Asbestos

Millbank Holdings will protect employees and other persons potentially exposed to asbestos as far as is reasonably practicable. Access to asbestos-containing materials in the premises will be controlled so as to prevent inadvertent disturbance of the material and the release of asbestos fibres.

Asbestos management is formally assigned to the Group Business Support Manager who shall ensure compliance with this policy and best current practice.

The premises will be surveyed to determine whether asbestos-containing materials (ACM's) are present. A written plan or register will be prepared that sets out the location of the asbestos-containing material and how the risk will be managed. The arrangements will be reviewed at regular intervals.

The register is held within the building management file.

Any work on, or removal of, asbestos-containing materials will be controlled to ensure that adequate precautions are taken to prevent the release of asbestos fibres. Work on asbestos-containing materials will only be undertaken by a contractor licensed by the HSE unless the work is exempted.

6.11 Work At Height

Millbank Holdings will take all reasonable steps to provide a safe working environment for all employees who may be affected by work at height activities and ensure that:

- the need to undertake work at height will be eliminated whenever it is reasonably practicable to do so;

Millbank Holdings Group Ltd (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h2 style="color: #008080;">Health and Safety Policy</h2> <h3 style="color: #008080;">Manual</h3>	HSPOL001/01/0423
		Last Reviewed: 04/2023
		Page 12 of 17
		Owner: David Hopley

- all work activities that involve work at height are identified and assessed and suitable work at height equipment is provided; and
- employees are trained and competent to carry out work at height activities safely

Ladders should only be used for light, short duration work only and secured to prevent displacement.

We will also ensure that the risks of falling objects and materials are adequately controlled.

6.12 Personal Protective Equipment

Millbank Holdings will provide personal protective equipment (PPE) when the risk presented by a work activity cannot be eliminated or adequately controlled by other means. To effectively implement its arrangements for the use of PPE Millbank Holdings will:

- ensure that PPE requirements are identified when carrying out risk assessments;
- provide adequate maintenance, cleaning and repair of PPE;
- instruct and train employees in the safe use and maintenance of PPE;
- make arrangements for replacing worn or defective PPE; and
- provide adequate accommodation for correct storage of PPE

Employees provided with PPE for use at work are required to adhere to all instructions on its use.

PPE is available for distribution to temporary workers via reception.

6.13 Occupational Driving

Millbank Holdings recognises that some roles have a requirement to drive on company business. Millbank Holdings is committed to reducing the risks its employees face or create when driving at work and will:

- ensure risk assessments are completed and that journeys are planned;
- not put unreasonable time constraints on travel;
- ensure those driving for business are competent, authorised and fit; and
- provide sufficient information and guidance for drivers on occupational risks involved in driving

Drivers will remain responsible for their safety and must comply with the Highway Code and road traffic legislation. Drivers must hold a valid licence and valid insurance for business use and be physically fit and not suffering from any health conditions or injuries, or using medication that may affect their ability to drive safely. Drivers are responsible for maintaining their own vehicles. Any accidents/incidents occurring whilst driving on behalf of Millbank Holdings must be reported to HR and line manager.

6.14 New and Expectant and Nursing Mothers

Millbank Holdings recognises that the general precautions taken to protect the health and safety of the workforce as a whole may not in all cases protect new, expectant and nursing mothers and there may be occasions when, due to their condition, different and/or additional measures may be necessary. We will ensure that risk assessments are carried out for all work activities undertaken by new, expectant and nursing mothers and that associated records and documentation are maintained.

As required by law, if additional risks to pregnant new, expectant and nursing mothers cannot reasonably be reduced, we will find alternative work (with no loss of terms or conditions), or authorise paid leave if alternative work is not available.

Millbank Holdings Group Ltd (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h2 style="color: #008080;">Health and Safety Policy Manual</h2>	HSPOL001/01/0423
		Last Reviewed: 04/2023
		Page 13 of 17
		Owner: David Hopley

We will provide a private rest area for new, expectant and nursing mothers. The rest area will be situated as near to sanitary facilities as possible. There will be facilities for them to lie down in the rest area.

6.15 Lone Working

Millbank Holdings will ensure, so far as is reasonably practicable, that employees who are required to work alone or unsupervised for significant periods of time are protected from risks to their health and safety.

We will determine, by risk assessment, those activities where work can actually be done safely by one unaccompanied person. In carrying out the risk assessment particular consideration will be given to:

- the remoteness or isolation of the workplace;
- suitable means of communication including in the event of an emergency;
- the possibility of interference, such as violence or assault from other persons; and
- the nature of injury or damage to health and anticipated "worst case" scenarios

Employees and others will be given all necessary information, instruction, training and supervision to enable them to recognise the hazards and appreciate the risks involved with working alone.

6.16 Employee Security

Violence and aggression is defined as actual or threatened physical assaults on employees and psychological abuse such as shouting, swearing and gestures. Millbank Holdings will not tolerate such behaviour and will:

- carry out risk assessments (where necessary) of potential conflict situations to determine the control measures necessary to protect employees;
- ensure that premises are kept secure including during periods of lone working;
- keep records of all incidents of violence and aggression and review the control measures

6.17 Visitors and Members of the Public

Millbank Holdings will ensure so far as is reasonably practicable, the health, safety and welfare of visitors. This includes ensuring that all areas where the public are present are safe and without foreseeable risk.

Our policy regarding the control of visitors on our premises is as follows:

- We must be aware that the visitor is on our premises.
- Our Visitors' Rules should be displayed in reception and explained to the visitor(s) on their arrival.
- As far as possible, visitors will be accompanied by an employee. Visitors will not be permitted to wander freely around working areas. This is important for safety and security reasons.
- Should a fire occur, the person who is accompanying the visitor will take him/her to the fire assembly point.

Any employee who notices persons acting in a way which would endanger colleagues should notify their line manager. If the danger is immediate, common sense must be used to give warning, call for assistance or give aid as necessary.

We reserve the right to request to search visitors' bags, packages and vehicles.

Millbank Holdings Group Ltd (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h2 style="color: #008080;">Health and Safety Policy Manual</h2>	HSPOL001/01/0423
		Last Reviewed: 04/2023
		Page 14 of 17
		Owner: David Hopley

6.18 Disabled Persons

Millbank Holdings will give full and proper consideration to the needs of disabled employees and visitors.

Millbank Holdings will treat all disabled employees and visitors with respect and dignity, both in the provision of a safe working environment and in equal access to Millbank Holdings' facilities.

Where it is necessary, reasonable adjustments to the premises and/or employment arrangements will be made for disabled persons. In an emergency evacuation, ensure suitable plans will be implemented to enable disabled people to leave the premises safely or to the refuge point.

6.19 Contractors

All contractors undertaking working for Millbank Holdings must comply with the contents of this Policy and the fire and evacuation policy. Contractors must ensure that all equipment, materials and premises under their control are safe and without risks to health.

No work will be allowed to begin until the questionnaire for contractors has been completed AND copies of the required documentation have been provided.

One of our main duties is to ensure adequate co-operation between the business and the contractor. No contract will commence or continue unless a designated Manager has been placed in charge of liaison with the contractor.

Any Senior Manager has the authority to stop the work of contractors who are placing themselves, other employees, or visitors at risk. Any employee who judges there is a risk where contractors are working should inform their manager immediately.

6.20 Waste Management

Millbank Holdings will minimise the production of waste by applying the principles of the waste hierarchy through prevention (of the creation of waste), re-use, recycling, other recovery or ultimately disposal.

Any waste that must be disposed of will be done so in a legally compliant and responsible manner and will ensure that all waste, which is classed as controlled industrial waste, is safely stored, handled and disposed of through an authorised person.

6.21 Stress

The Health and Safety Executive define stress as "the adverse reaction people have to excessive pressure or other types of demand placed on them". This makes an important distinction between pressure, which can be a positive state if managed correctly, and stress which can be detrimental to health.

Stress at work can come about for a variety of reasons. It may be excessive workload, unreasonable expectations, or overly-demanding work colleagues. As a reasonable company, we try to ensure that you are in a pleasant working environment and that you are as free from stress as possible.

We will:

- work to identify all workplace stressors and conduct risk assessments to eliminate stress or control the risks from stress
- regularly review risk assessments

Millbank Holdings Group Ltd (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h2 style="color: #008080;">Health and Safety Policy Manual</h2>	HSPOL001/01/0423
		Last Reviewed: 04/2023
		Page 15 of 17
		Owner: David Hopley

- provide access to confidential counselling for employees affected by stress caused either by work or external factors
- provide training for all managers and supervisory employees in good management practices
- provide adequate resources to enable managers to implement the company's agreed stress management strategy.

Employees who experience unreasonable stress which they think may be caused by work should raise their concerns with their manager or HR.

6.22 Indoor Environment

Lighting

Adequate lighting will be provided throughout the premises, and particularly on staircases.

- Defective switches, fittings, blown bulbs/tubes, etc. must be reported to Reception, who will arrange for replacements as soon as reasonably practicable.
- Adequate artificial lighting will be provided and maintained for outdoor pedestrian routes during the hours of darkness.

Temperature

- Office environments rarely have such extremes of temperature to cause ill health.
- High temperatures can cause such symptoms as fatigue, loss of concentration, dehydration or heat cramps, dizziness or loss of grip on objects due to sweat.
- Low temperatures can produce effects like shivering, poor grip or touch for handling operations. Both extremes can make people more likely to have accidents.
- Although the minimum recommended temperature for seated or light work is 16°C, where reasonable, a temperature of 18 – 20°C will be maintained.

Welfare Facilities

Sufficient toilets, washbasins / washing facilities will be provided and maintained in good condition.

- Hot and cold water, or water at a suitably controlled temperature, will be provided, together with soap and hand dryers.
- An area separate from the working area will be provided for employees/contractors to consume food and drink.
- A readily accessible supply of drinking water will be provided, from the public water main supply, where possible. Drinking water supplies will be marked to distinguish them from other supplies.

It is the Group's Business Support Manager's responsibility to ensure regular checks are undertaken to ensure that the indoor environment, complies with the above arrangements.

7 Monitoring and Review

Measurement is essential to maintain and improve our health and safety performance by identifying how effectively we are controlling risks and how well we are developing a positive health and safety culture.

There are two types of performance monitoring, active and reactive.

Millbank Holdings Group Ltd (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h2 style="color: #008080;">Health and Safety Policy Manual</h2>	HSPOL001/01/0423
		Last Reviewed: 04/2023
		Page 16 of 17
		Owner: David Hopley

7.1 Proactive monitoring

Proactive monitoring is designed to identify and where necessary rectify risks before they cause harm. Millbank Holdings will ensure that checks and inspections of the workplace are undertaken at suitable frequencies and a record made against relevant health and safety standards. Much of this checking will be informal and not recorded but formalised, structured checks will also be undertaken and recorded to demonstrate compliance with legal standards. Millbank Holdings will encourage employees to participate in workplace inspections and take an active interest in health and safety monitoring.

A general risk assessment and fire risk assessment will be undertaken by our competent person each year which will support Millbank Holdings' active monitoring arrangements.

7.2 Reactive monitoring

Reactive monitoring is triggered after an event including accidents, incidents, and cases of ill health or property damage. The organisation will investigate all such incidents which provide an opportunity to check performance and learn from mistakes and improve control measures.

Investigations may also provide valuable information in the event of legal action or an employee claim.

7.3 Review

Following monitoring and reviewing health and safety performance and documentation, the organisation will revise all procedures, assessments and documentation wherever necessary and bring these amendments to the attention of all employees.

It is the responsibility of HR, to ensure active and reactive monitoring arrangements are undertaken.

8 Organisation Safety Rules

It is incumbent on every employee to observe the following safety rules. Failure to do so will be considered to be a breach of the contract of employment and may result in disciplinary action being taken.

Employees must:

- take reasonable care of their own safety and that of any person affected by their actions or inactions;
- be aware of and adhere to the organisation's rules and procedures on health and safety
- immediately report any unsafe working practices or conditions to their line manager
- comply with all laid down emergency procedures and ensure any fire escape route, fire equipment or fire doors are not obstructed
- ensure passageways and work areas are kept clean and tidy and that spillages are cleaned up immediately
- make proper and safe use of all equipment and facilities provided
- ensure all waste materials are disposed of carefully in the receptacles provided and in such a way that they do not constitute a hazard to others
- wear suitable clothing, footwear and PPE where appropriate
- report all injuries/incidents to their line manager and ensure that it is properly recorded in the accident book
- report any medical condition which could affect the safety of themselves or others; and
- comply with all hazard/warning signs and notices displayed on the premises

Millbank Holdings Group Ltd (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h2 style="color: #008080;">Health and Safety Policy Manual</h2>	HSPOL001/01/0423
		Last Reviewed: 04/2023
		Page 17 of 17
		Owner: David Hopley

Employees must not:

- undertake a task which appears to be unsafe
- undertake a task until they have received adequate safety instruction and they are authorised to carry out the task
- misuse any firefighting equipment provided
- interfere with any protective guards and other safety devices; and
- drive or operate vehicles in connection with work whilst suffering from a medical condition or illness that may affect their driving or operating ability

This is not an exhaustive list.

9 Rules Covering Gross Misconduct

An employee will be liable to summary dismissal if they are found to have acted in any of the following ways:

- a serious or wilful breach of Safety Rules;
- wilful damage to, misuse of or interference with any item provided in the interests of health and safety or welfare at work;
- horseplay or practical jokes which could cause accidents;
- deliberately disobeying an authorised instruction This is not an exhaustive list.

10 Related Documents

- None

11 Policy Review

This policy will be reviewed annually, when circumstances indicate a change is needed or when legislation is introduced that necessitates change.

Signed by:

David Hopley

Title: Managing Director

Date: April 2023

Any personal data collected in line with this policy will be stored and used in line with our Data Protection Policy, Retention Policy and Privacy Notice.