

THE
KENTON
GROUP



Health and Safety Policy

This statement sets out the Health & Safety Policy of The Kenton Group and the means through which that policy is to be implemented. Our objective is to provide a safe and healthy place of work for all staff members and to meet all our duties and obligations to our clients.

It is the Company's intention to protect our employees from accident or ill health at work. The company will seek to ensure that all our equipment and systems do not constitute a risk to the Health & Safety of our employees and we will consult with employees on risk improvements.

1 The Company's approach to Health & Safety as far as is reasonably practicable will be:

- To Provide a Safe Place of Work.
- To continue to identify and control hazards.
- To prevent as far as is reasonably possible, any improper conduct Safety Health & Welfare of employees at risk.
- To consult with staff on all Health & Safety matters.
- To provide protective clothing and equipment where necessary.
- To provide a safe means of entering and leaving the building.
- To provide a safe system of work practices.
- To provide appropriate information and training to staff members
- To make Health & Safety a key issue.

2 Employer Responsibilities:

The responsibility for the provision of a safe place of work rests with the Management of the Kenton Group.

Specifically these responsibilities are:

- i) To maintain a safe and healthy work environment for employees, in addition to conforming to all current statutory requirements.
- ii) Provide the appropriate level and type of training, enabling employees to perform their work safely and efficiently.
- iii) Make available to every employee, the appropriate equipment to ensure Health & Safety.
- iv) To maintain a vigilant and continuing interest in all Health & Safety matters relevant to both the company and staff.

3 Employee Responsibilities

As a valued employee of The Kenton Group you have a responsibility to yourself and your fellow workers to carry out your work in a safe and considerate manner.

Employees must:

- I. Co-Operate with the company in maintaining a safe work place.
- II. Report any potential hazards to management and not work in any hazardous conditions should they, in the employee's opinion, exist.
- III. Be aware of the nearest emergency exits and fire-fighting / first aid equipment.
- IV. Never interfere with or misuse anything provided by the company in the interests of Health & Safety.
- V. Read the company Health & Safety statement and obey all mandatory signs.
- VI. Not partake in any form of horseplay or prank likely to lead to injury to you or others.

4 Smoking Alcohol and Drugs:

It is not permissible to attend work under the influence of intoxicating liquor or drugs. The smoking of tobacco products is prohibited in the offices of The Kenton Group. Smoking can take place outside the company building in the designated area, which is at least 3 metres distance away from door entrances and windows.

This smoking policy forms part of the overall Health & Safety Policy and any breach will be dealt with under the Company's disciplinary procedure, Visitors, contractors and temporary members of staff are expected to abide by the terms of this policy.

5 Manual Handling:

Manual Handling is defined as the "transporting of a load by one or more employees and includes lifting putting down~ pushing carrying or moving a load, which by reason of its characteristics or of unfavourable ergonomic conditions involves risks~ particularly of back injury to employees".

This is a priority issue because it is a major cause of accidents in the workplace. It is the Company's policy to minimise the need for manual handling of loads and so therefore should be avoided as far as is reasonably practicable. Employees must check the weight of the load before attempting to lift it and if the load is too heavy get help.

When lifting, follow the following basic principles.

1. Relax the knees. Lowering movements should start at the knees not the head.
2. Get close to the object to be lifted. Get a good balance by keeping the feet apart. One foot will automatically be ahead of the other.
3. When in position, bend the knees and lift with the strong muscles in the legs.
4. Lift gradually, smoothly and without jerking, keeping the object close to the body and the back straight.

6 Training:

The company is committed to identifying the safety training needs on an on-going

basis. Staff will be involved in the identification of hazards in the office and advised of the particular hazards pertaining to their area.

Staff will be trained to respond to such hazards in order to prevent accidents/injury to themselves, their colleagues and clients.

Staff training is available using Computer Based Training modules. These cover Asbestos awareness, Manual Handling, DSE Fire Awareness, Fire Warden and Slips, Trips and Falls. Training material is reviewed on a regular basis and updated when necessary. Records of completion are maintained with records kept on the server and reminders sent when re-certification is required. All staff will be trained in emergency procedures, and where appropriate staff will be trained in the use of special machinery and equipment

7 Consultation/Communication

The company believes in the importance of the relationship between its management and staff. Each individual should feel free to discuss any subject with their manager knowing that they will be sincere in their efforts to give correct and full replies.

The Company wishes to ensure a free flow of information concerning all matter which can affect an employee's work or their relationship with the Company or colleagues, in most cases an informal talk can settle such matters.

The Company provides a notice board within the canteen area for the use of staff and for posting important material. Individual communication can be via e-mail, letter or verbal.

Members of staff are involved in the identification of hazards and are trained in dealing with the hazards identified.

Line Managers will carry out a regular tool talk with engineers and office staff dealing with H&S issues. These are to be minuted and such minutes passed to the H&S Manager for review and comment.

The Senior Managers will hold a Management review meeting on a regular basis and H&S issues will form part of the Agenda,

The Directors hold regular Senior Management Review meetings, where H&S forms part of the Agenda.

Any individual not satisfied with the actions taken by their line manager can escalate the matter to the H&S manager who will report to the Directors on action taken or review the issue and inform the employee of the Directors decision. Full details are provided in the Company staff handbook which is available to all staff members on request.

8 Reporting of Accidents: (RIDDOR)

All Staff are required to report all accidents and near misses, whether resulting in injury or not, to management. Under The Reporting of Injuries, Diseases and

Dangerous Occurrences Regulations 1995 (RIDDOR) employers must report injuries within 7 days where an individual has been off work for more than 7 days or attended a hospital as a result of the incident. All injuries to a member of the public are to be reported as a matter of course.

Records are to be retained on site for a period of 10 years.

All accidents will be investigated by a member of management and a written report prepared. Corrective action will be taken where necessary to avoid a re-occurrence.

Accidents involving persons who are not members of staff but are visiting or working on the premises must also be reported through the RIDDOR chain.

9 Fire Procedures:

In the event of a fire and providing there is no danger to the persons concerned every effort should be made to co-operate with the building owners to assist in extinguishing or contain the fire pending the arrival of the fire brigade. The magnitude of the outbreak must dictate whether attacking the fire should take priority over reporting and evacuation.

All staff should be familiar with the exit routes and should also know the location and type of fire extinguishers in the building.

If you discover a fire you should:

- Activate the fire alarm.
- If there is a reasonable hope of extinguishing the blaze attack the fire immediately. Do not under any circumstances, expose yourself to danger.
- Leave the building by the nearest fire exit and proceed to your designated assembly point.

If you hear the alarm you should:

- Switch off any equipment under your control and leave the building by the nearest fire exit.
- Do not stop to collect personal belongings.
- Once outside, do not enter the building until you are told it is safe to do so.
- Management will on occasions perform fire drills to ensure that procedures are known and followed in the event of a real fire.
- The fire alarm is tested regularly by the building owners. They hold overall responsibility for the building fire procedures. TKG are responsible for ensuring our own personnel and leased spaces within the building are operated safely within the requirements of the building owner, and assist them in the event of any emergency. All safety and emergency equipment provided by the building owners should not be interfered with.

10 Guidelines for VDU users.

As part of their duties some employees spend long periods of time using visual display screens. Any necessary adjustments will be made to avoid RSI, eyestrain and other ailments associated with work on screens, which must be adjustable for height, tilt and brightness. No employee will be asked or expected to work any computer which is not in proper working condition, or does not meet the highest specifications.

Employees working continuously on-screen should alternate tasks so that at least 10 minutes during each 60 minutes of work is spent doing off screen type of work. This work is to be undertaken away from the screen, but does not constitute a break.

Employees who habitually use VDU's have the right to an eyesight test, the cost of which will be met or reimbursed by the company.

11 Hazard Analysis:

A hazard is anything at work that might cause harm e.g. Electricity, Hot Surfaces, Lifting Heavy Loads, Slippery Floors, and Poorly Lit Stairways etc. Staff must be aware of the potential hazards and risks involved and report specific hazards to management.

A hazard analysis will be carried out once a year by Management. Particular attention will be paid to areas of high risk i.e. Floors Stairs and Manual Handling.

The company will remove hazards by engineering means where necessary.

12 COSHH

The Control of Substances Hazardous to Health (COSHH) Regulations have been formatted to ensure that employers take reasonable steps to reduce the risk to employees from exposure to hazardous substances in their working environment.

The Company will assess the risks associated with the use of a substance before they allow employees to be exposed to it.

Documentation on the substances held or used within the Company work environment is held on the Company server at K/H&S/COSHH sheets.

The full Company Policy on COSHH can be found at K/QA/Company Policy Documents/023.

13 Personal Protective Equipment(PPE)

The Company is commitment to meeting the requirements of the Personal Protective Equipment at Work Regulations 1992 (as amended). It identifies the duties of each Employee, Line Manager and Directors and provides guidance to those charged on their behalf with taking action necessary to ensure compliance.

The requirement for the Company to provide Personal Protective Equipment

(hereafter referred to as "PPE") is contained in the Personal Protective Equipment at Work Regulations 1992 (as amended), as well as a range of other legislation, Codes of Practice and formal guidance.

Under the Regulations, PPE is defined as all equipment (including clothing affording protection against the weather) which is intended to be worn or held by a person at work and which protects him/her against one or more risks to his/her health and safety. The Regulations extend to assessing the need to ensure that PPE is suitable for the identified use, maintained in an efficient working state, and to the provision of information, instruction and training to enable effective use. The full PPE Policy can be found at K/QA/Company Policy Documents/031.

14 Use and Maintenance of Work Equipment:

The Company's intention is to ensure that hazards which may arise from work equipment are considered, when selecting, purchasing or replacing, new equipment. How to prevent injuries and carrying out associated assessments, and finally routine monitoring and maintenance will also be taken into account.

Work equipment includes machinery; tools or equipment used by an employee at work e.g. hammers, knives, machinery, lifting equipment, computers, photocopiers, ladders, pneumatic lifting equipment and even a kettle.

All such work equipment comes under the requirements of the Provision and Use of Work Equipment Regulations 1998. Lifting equipment also has to meet the Lifting Operations and Lifting Equipment Regulations 1998. The regulations apply to employers, contractors and the self-employed. Full details of the Policy can be found at K/QA/Company Policy Documents/027.

15 Portable Electronic Equipment:

All portable electronic equipment held by the company will be tested by a qualified PAT tester on a regular basis if required. It is the policy of the company to carry this out using in house qualified engineers. Testing will be carried out in accordance with the Electricity at Work regulations 1989 and HSE documentation. Any item failing a test will be removed from service and safely disposed of or repaired where possible.

16 First Aid:

First Aid boxes are provided to ensure that first aid supplies are easily accessible when required in an emergency. First Aid boxes are located at on the First floor office. They are to be checked weekly and shortages replaced. Employees have an obligation to ensure that First Aid Boxes, like any safety equipment, are not tampered with. Free access to First Aid Boxes must be maintained at all times. Painkillers cannot be provided in the First Aid Boxes. There are members of staff qualified in First Aid and their names are displayed on the noticeboard in Company work spaces, together with contact numbers.

17 Asbestos:

No member of the Company will work on or within premises where there is risk of exposure and an Asbestos report has not been provided at the survey stage. Should a work area be shown as having Asbestos present the compliance manager will carry out a risk assessment and determine if it is safe to commence work. Where there is

exposed (friable) Asbestos then work will not be carried out until a clearance certificate has been produced from a suitably qualified analyst. See Company Policy 024 Asbestos Policy issue 2, Control of Asbestos regulations 2006 and the Control of Asbestos Regulations 2012. For advice all enquiries to the Compliance Manger.

18 Security:

During the course of employment employees may accumulate confidential information about the Company its affairs, products and customers. Employees must not divulge any of this information, during or after their employment, except in the course of their duties. If at any time an employee is requested to supply confidential information, which is supplied without permission, it could lead to instant dismissal.

On termination of employment (for any reason) employees must deliver all information, relating to the affairs, and business of the Company, in their possession and control, to their manager. For Example, this includes all records, documents, accounts, letters, data and papers of any description and in any format.

Private Property

The Company does not accept responsibility for any loss theft or damage to private property, including cars and bicycles. Employees are expected to exercise proper care over personal belongings. However if any loss occurs it should be reported to a Manager. Any employee, finding an article of personal property on the premises should hand it to a Manager.

Company Property

Company property must not be removed from the premises without the authority of the Director in charge. A logbook will be held of all materials and equipment on loan. All laptops, mobile phones, security dongles, keys, Proximity cards and identity cards will be signed for by the individual responsible and returned to the line manager at the end of their employment.

19 Working at Height:

The Company does not allow employees to work above the height of 2m. All staff involved with working at height will undergo ladder training and certification held on their file in the H&S directory on the Company server. All ladders and steps will be inspected and tested on a regular basis. Each item will be recorded in the Ladder register together with the appropriate test sheet. All failures will be removed from service and responsibly disposed of.

20 Welfare:

The Company provide welfare facilities within the building. There is a canteen providing a rest area and facilities including fridge, freezer, microwave, kettle, cutlery, plates and hot water. The area is inspected daily and cleaned every evening by contract cleaners. Toilet facilities are provided and are gender separated. Hand washing, (hot and cold water) facilities are provided, as well as hand sanitizers, situated throughout the building. Engineers working away from the main office environment are provided with site surveys which state the facilities

available at buildings they are visiting. If a survey is not available or does not identify such facilities then the engineer is entitled to locate the nearest suitable facilities and travel to them within work time. Assistance with this can be provided if necessary by the Network Operating Centre.

21 Company Handbook:

All the above is expanded in the Company Handbook, which is available to all employees on request.

22 Monitoring/Review:

The Health and Safety Policy Statement will be reviewed on a yearly basis or more often if legislation or incidents occur that require such an amendment. It is the Compliance Manager's responsibility to monitor the H&S Policy and all relevant documents. Line managers are to ensure that H&S is included in their briefings/tool talks and that all Management Meetings address the same issue, at all levels.

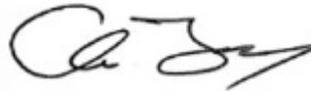
23 Health Surveillance:

The Company does not carry out work in an environment where members of staff could become contaminated or infected. However, should the need arise an Occupational Health Professional will be engaged by HR to work with the management and employees to minimise or negate any possible injury or permanent damage. On-going risk assessments and method statements should ensure that no member of staff will use equipment, enter premises or sites where staff could become contaminated or infected during the course of their work.

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John Larkin
Managing Director



Clive Jones
Compliance Manager

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