

HK Interiors Ltd

Health & Safety Policy

Section 1 Policy Statement

- 1.1 Health & Safety Policy Statement and Declaration of Intent

Section 2 Organisation

- 2.1 Roles and Responsibilities
- 2.2 Governance
- 2.3 Board of Directors
- 2.4 Executive Directors
- 2.5 All Employees
- 2.6 Relationships with other Legal Entities
- 2.7 Responsibility of Visitors and Contractors (working for the company)
- 2.8 Competent Health & Safety Advice
 - 2.8.1 Operations Manager Will
 - 2.8.2 Operations Manager Will Ensure
 - 2.8.3 Members of the Public

Section 3 Governance and Corporate Arrangements

- 3.1 Health & Safety Leadership
- 3.2 Health & Safety Culture
- 3.3 Health & Safety Systems and Processes
- 3.4 Service Delivery
- 3.5 Setting Health & Safety Objectives
- 3.6 Corporate Monitoring
- 3.7 Provision of a Corporate Health & Safety Training Strategy/Plan
- 3.8 Establishing Adequate Health & Safety Communication Channels
- 3.9 Measurement of Health & Safety Performance
- 3.10 Arrangements for Safe Working on Site

Section 4 Corporate Auditing & Review

- 4.1 Site Inspections
- 4.2 Reviewing Performance

Appendix 1

HK Interiors Management Arrangements Organogram

Health and Safety Policy Statement

Introduction

HK Interiors commitment to effective and successful Health & Safety management forms part of the Company wider agenda of social responsibility, sustainability, corporate governance, risk management and delivery of quality services; we require this same commitment from our partners and contractors. This means having in place effective management arrangements that ensure the well-being of our employees and service users including customers and members of the general public and that minimise the losses (both financial and reputational) to our business from ill health and injury.

Implementation of this Health & Safety policy and associated policies, guidance and management systems will contribute to improving corporate performance.

This Health & Safety policy has been reviewed by the companies Health & Safety Advisor and is fully supported by all Directors and Managers.

Guiding Principles

To achieve continuous improvement in our Health & Safety performance through management leadership and the commitment of our employees there are five guiding principles;

- | | |
|------------------------|--|
| Control | Management are responsible for the clear allocation of Health & Safety responsibilities and for monitoring the implementation of those responsibilities. |
| Co-Operation | We all have a responsibility to co-operate as individuals and as groups to make Health & Safety a collaborative effort. |
| Communication | Communication of Health & Safety information is essential and includes our visible behaviour, written communication, and face to face discussions. |
| Competence | Developing Health & Safety competence of, directors, managers, employees, the Health & Safety advisers, volunteers and contractors is at the heart of Health & Safety management. |
| Risk Management | Through the adoption of a pragmatic approach which encourages risks to be managed in a sensible, responsible and proportionate manner in line with all relevant regulatory requirements, with a focus on the effective management of real risks - including those that are most likely to cause serious harm and those which are likely to happen more frequently. |

These guiding principles are interrelated and interdependent so that consistent activity and effort in each area is needed to promote a climate in which a positive Health & Safety culture can develop.

The costs of poor health and safety at work Include death, major Injury, lost working days due to injury and occupational ill-health, uninsured losses, civil claims and loss of reputation. Failure to comply with Health & Safety legislation can have serious consequences - for individuals as well as organisations. Penalties include fines, and imprisonment. Under the Corporate Manslaughter and Corporate Homicide Act 2007, an offence will be committed where failings by an organisation's senior management are a substantial element in any gross breach of the duty of care owed to the organisation's employees or members of the public, which results in death. The maximum penalty is an unlimited fine and the court can additionally make a publicity order requiring the organisation to publish details of its conviction and fine.

The Policy Document is in four parts:

Statement	The Director declaration of intent on behalf of the Company and the Health & Safety Policy Statement.
Organisation	The management structure and the defining of roles and responsibilities within the organisation.
Arrangements	The corporate procedures and systems necessary for implementing the policy.
Monitoring	The system for monitoring the effectiveness of the arrangements and for reviewing and reporting on Health & Safety performance.

1.0 POLICY STATEMENT

HK INTERIORS LTD HEALTH & SAFETY POLICY STATEMENT AND DECLARATION OF INTENT

Policy Aim

To be an organisation where everyone can undertake their roles and responsibilities and fulfil their potential free from work related injury or ill health; this includes, Directors, employees, partners, visitors and customers who may be affected by our work activities or omissions.

Policy Objectives

- To conduct all our activities safely and in compliance with legislation and where possible, best practice
- To provide safe working conditions and safe equipment
- To ensure a systematic approach to the identification of risks and the allocation of resources to control them
- To be a healthy and safe organisation that promotes a positive Health & Safety culture that is demonstrated by open communication, a shared commitment to the importance of health, safety and welfare, and by confidence in the efficacy of preventive measures
- To promote the principles of sensible risk management

This policy is approved by a Director on behalf of all Directors of HK Interiors Limited and covers the period from January 2025 to December 2026.

It will be reviewed every two years or earlier (as required and stated within the Health & Safety at Work Act 1974) when procedural, legislation or best practice changes occur, to ensure it remains effective. If necessary, amendments will be communicated to all employees.

Aaron King

Director

Date:


26/01/26

2.0 ORGANISATION

2.1 Roles and Responsibilities

It is a requirement of the Health & Safety at Work Act 1974 and subordinate legislation that all employers and employees have Health & Safety responsibilities when at work.

Although some duties and responsibilities may be delegated, accountability for health, safety and welfare at work is not transferable and cannot be evaded. Executive direction of the Company policy for Health & Safety matters, including authorisations, will follow normal arrangements for responsibility and accountability.

The Company recognises that the key to further improvements In Health & Safety lie in securing a systematic approach to Health & Safety management throughout the organisation so that Health & Safety becomes fully integrated with all other aspects of business management. This requires strategic leadership, supported by specialist professional input.

2.2 Governance

Governance is about organisations ensuring that they are doing the right things in the correct manner for the right people in a timely, open, honest, inclusive and accountable manner. Overall governance arrangements for Health & Safety are with the Directors. The Executive Board will provide the definitive governance for Health & Safety. These governance structures will enable the Health & Safety management systems, actions and levels of performance to be appropriately challenged.

2.3 Board of Directors

The Company Executive Board members have a responsibility to conduct their business and make decisions in conformity with Health & Safety legislation and the Company policies. Members must ensure that the decisions they make take account of Health & Safety Issues and that sufficient resources are allocated for this purpose. As a result of the powers given to individual members there is an increased possibility that they could be held legally liable for the consequences of their decisions in Health & Safety terms.

2.4 The Executive Directors are responsible for:-

- Providing clear and visible Health & Safety leadership that encourages employee involvement in improving Health & Safety standards
- Ensuring that all decisions made reflect their Health & Safety intentions as articulated in the Health & Safety policy statement
- The implementation and effective operation of an integrated Health & Safety management structure that supports successful Health & Safety management
- The monitoring of Health & Safety arrangements that includes progress against the corporate Health & Safety Management System with the provision of adequate resources to enable the delegation of their Health & Safety responsibilities
- Ensuring the effective operation of their Health & Safety management structure, the communication of Health & Safety issues and the effective coordination of responsibilities with partner organisations
- Ensuring that accountability for Health & Safety management is properly assigned, understood and accepted at all levels and that effective monitoring and reporting arrangements
- Provision of adequate resources to enable the delegation of their Health & Safety responsibilities

2.5 All Employees must comply with the Health & Safety policy and in particular are required: -

- To visibly support the Health & Safety arrangements, work with employee Health & Safety representatives and ensure that all employees are aware of and accountable for their specific Health & Safety responsibilities and duties
- To ensure Health & Safety policies/guidance, procedures, action plans and risk management programme are implemented as an integral part of business and operation planning and service delivery
- To develop and implement robust procedures to ensure that Health & Safety standards are demonstrably met
- To support accident and incident investigations, review reports and statistics, utilise information on trends and hot spots
- To undertake monitoring and ensure the provision of adequate resources to achieve compliance
- To complete Health & Safety self-assessments as required
- Where two or more Businesses share a site, to ensure that clear Health & Safety roles and responsibilities and means of communication and co-ordination between the services are established and maintained
- To identify hazards, initiate risk assessments, record the significant findings and implement any necessary control measures
- To check and document that the working environment is safe; equipment, products and materials are used safely; that Health & Safety procedures are effective and complied with and that any necessary remedial action is taken
- To inform, instruct, train, supervise and communicate with employees and provide them with equipment, materials and clothing as is necessary to enable them to work safely; to complete the Health & Safety induction checklist for all new employees at the commencement of their employment
- To report all accidents, Incidents and near miss events, undertake an investigation into the cause and take appropriate remedial action to prevent recurrence
- To complete Health & Safety self-assessment audits as required

2.6 Relationships with Other Legal Entities

The Company's responsibilities and those of its employees within certain undertakings may often appear unclear. There will be different circumstances and relationships surrounding each individual undertaking that may need legal clarity should enforcement or litigation arise. When assessing responsibility and accountability for these undertakings, the resources made available by each party, including time, funds and technology will need to be considered. When entering into a partnership or voluntary venture it is essential that absolute clarity on Health & Safety roles and responsibilities and means of communication and co-ordination are established at the outset, in the same way as other support arrangements such as finance are normally clarified.

2.7 Responsibility of Visitors and Contractors working for the Company

Contractors working for the Company have legal duties placed on them under the Health and Safety at Work Act 1974 and subordinate legislation to safeguard the Health & Safety of their own employees and anyone who may be affected by their business activities.

Therefore, contractors when working for the Company must conduct their activities in such a way that they do not endanger Company employees or anyone for whom the Company has a duty of care.

Contractors will be selected according to the Company specifications and approval procedures. All contractors will be required to meet relevant statutory duties and the Company policy for Contractors at Work. The Company procurement arrangements when establishing a contract will include systems and protocols that will ensure adequate public and professional liability cover.

2.8 Competent Health & Safety Advice

The team is responsible for advising directors, management, and all other employees on all aspects of Health & Safety and will liaise closely with people within the Company to support Health & Safety management, including facilities & services and training and development. They will network closely with external Health & Safety agencies e.g. Health & Safety Executive, Fire Authorities and other public service organisations.

2.8.1 Operations Manager will:-

- Develop, and advise on, corporate Health & Safety Policy, procedures and topic-specific guidance
- Provide advice and guidance on compliance with relevant statutory requirements within a sensible risk management framework
- Monitor Health & Safety performance across all areas, conduct audits where required, and make recommendations to achieve Health & Safety improvements where necessary
- Ensure the provision of Health & Safety training that supports skills and knowledge transfer
- Provide professional/specialist advice as necessary
- Provide support and an auditing and monitoring service where necessary to meet the corporate objectives of this Health & Safety policy
- Develop and advise on occupational health and well-being policies, guidelines and processes
- Provide advice and guidance on compliance with relevant statutory requirements and the application of best practice
- Ensure systems are in place to monitor compliance against standards, including fire, asbestos and water management
- Monitor occupational health and well-being performance across all areas
- Review Health & Safety performance by examining Health & Safety monitoring, auditing and review activities
- Establish, develop and maintain effective communication channels and systems to guarantee the exchange and sharing of Health & Safety knowledge and information
- Review any Health & Safety audit or Inspection reports
- Report to Executive Board to assist them in discharging their responsibilities
- Promote and develop measures to ensure Health & Safety at work and monitor their effectiveness
- Monitor and evaluate the up-take and effectiveness of Health & Safety training

2.8.2 Operations Manager will ensure: -

- All Company premises are safe and comply with legislative requirements
- Provide a forum for further discussion of matters that have not been resolved at normal employee/management level
- Help prevent work-related ill health
- Help to establish and maintain physical and mental well-being within the workforce
- Ensure effective communication channels and systems to ensure the exchange and sharing of Health & Safety knowledge and information
- Advocate and promote policies and initiatives that protect and minimise risk

2.8.3 Members of the Public

Through local communications such as signs, posters etc. members of the public are encouraged to co-operate with the Health & Safety arrangements put in place to protect them and the people who are providing a service for them.

3.0 GOVERNANCE AND CORPORATE ARRANGEMENTS

The principles of good governance are integrity, openness and accountability. These arrangements describe the systems and procedures necessary to ensure that the Executive Board fulfil their responsibilities and provide the foundation for securing the Health & Safety of the Company employees, contractors, visitors and customers within a framework of good corporate governance.

Good Health & Safety governance combines the 'hard' factors of robust systems and processes with the 'softer' characteristics of effective leadership and high standards of behaviour. This involves: -

3.1 Health & Safety leadership

Strong leadership on Health & Safety will be provided by the Executive Board and Operations Manager to establish a vision of successful Health & Safety management. This leadership and vision will generate clarity about Health & Safety strategy, management objectives, Health & Safety roles and responsibilities and foster professional relationships.

3.2 Health & Safety Culture

A positive Health & Safety culture based on openness and honesty in which decisions are based on the principles of sensible risk management, lessons are learnt from mistakes and accountability is clear.

3.3 Health & Safety Systems and Processes

Health & Safety systems and processes must support accountability and will include risk management and performance management information and Health & Safety inspections, audits and monitoring. These systems and processes must be robust, produce reliable Information that is reported to the Executive Board to enable informed decisions to be made and to achieve objectives.

3.4 Service Delivery

Some of the services that the Company delivers have inherent risks and a relatively high hazard burden and some of the risks associated with service delivery cannot always be eliminated. The Company will ensure that not only does it identify the risks but that they are managed and controlled within a sensible risk management framework.

3.5 Setting Health & Safety Objectives

The Executive Board will meet, to determine if Company Health & Safety Objectives are being achieved and if necessary, ensure that the outstanding issues are being prioritised and addressed via a risk-based approach.

The Operations Manager will provide professional advice, guidance and support together with audit and monitoring reports to support in these assessments.

3.6 Corporate Monitoring

The Company Directors will measure the Health & Safety performance via monitoring and assessment techniques including audits. Assessment of performance will be against the criteria set in the Health & Safety Policy, procedures and topic guidance. The results will be reported to the Executive Board, which will consider and act on the findings.

3.7 Provision of a Corporate Health & Safety Training Strategy/ Plan

Training and development provides the lead on the provision of formal Health & Safety training covering various Health & Safety topics on an on-going basis. The training and guidance will take account of the company Health & Safety priorities, potential high risk factors, legislation and specific key issues. As part of the agreed objectives and priorities the Executive board may wish to instruct Site Management that their attendance may be compulsory for certain levels of management training. In addition, Site Management will ensure formal induction training is delivered that must include Health & Safety awareness. Attendance on all training and development Health & Safety courses will be recorded. Information, instruction and training on Health & Safety are provided in an increasingly wide variety of formats including guidance documents, e-learning and toolbox talks to promote access to learning.

3.8 Establishing Adequate Health & Safety Communication Channels

In addition to the Company's established structure and the joint consultative forums, communication channels for the exchange of Health & Safety knowledge and information already exists through the day-to-day supervisory channels. These channels may need to be formalised by managers/supervisors and regularly evaluated by input from external professional support advisors.

At Directorate level the results of the risk assessment process are key elements of the communication process. On- site safety systems rely extensively on the exchange of information. It is essential that local risk assessments are undertaken to ensure that procedures and systems are correctly documented, legible and readily available.

Although it is primarily the responsibility of senior managers and managers/supervisors to initiate such information, the value of 'bottom up' feedback is important. Employees must always have opportunity and be encouraged to contribute to this process without fear of penalty.

3.9 Measurement of Health & Safety Performance

In order to substantiate that Health & Safety standards are being achieved, it is necessary to measure performance against pre-determined plans and objectives. Any areas where the standards are not being met will require remedial action.

The types of systems that may be used to measure Health & Safety performance include:

Active monitoring systems:

- Monitoring and inspections that measure Health & Safety performance on a routine basis; e.g. spot checks
- Documents relating to the promotion of the Health & Safety culture should be periodically examined
- Premises, plant and equipment should be systematically inspected
- Health surveillance and environmental monitoring systems should be established to check the effectiveness of health control methods and to detect early signs of harm to health

Reactive monitoring systems:

- Identify where Health & Safety standards are not being met, by monitoring for failures in the systems - such as accidents, cases of ill health (work-related sickness), damage to property, etc.

Reporting and response systems:

- Ensures that monitoring information is evaluated by people competent to identify situations which create an immediate risk to health or safety, as well as longer-term trends. They must also have sufficient authority to ensure that appropriate remedial action is taken
- Executive Board all receive and consider reports on Health & Safety performance

Investigation systems:

- Where priority is given to incidents which indicate the greatest risk and the Identification of both the immediate and the underlying causes of events
- For adequate analysis of all collected data to identify common features or trends and initiate improvements at an organisational level
- Where cases of occupational ill-health are to be investigated
- Where complaints relating to occupational Health & Safety are to be recorded and investigated
- Where accidents/Incidents and assaults with the potential to cause injury, ill-health or loss are to be reported, recorded and appropriately Investigated

3.10 Arrangements for Safe Working on Site

Construction (Design and Management) Regulations 2015 (CDM)

For projects where HK Interiors Ltd are appointed as Principal Contractor we plan, manage, monitor and coordinate the entire construction phase, taking into account the health and safety risks to everyone affected by the work and managing the measures needed to control them. This includes liaising with the Principal Designer to share any information relevant to the planning, management, monitoring and coordination of the pre-construction phase. All relevant information is provided to the Principal Designer as soon as the information becomes available, which is usually after the completion of the work stage.

We undertake contractor assessments on sub-contractors prior to appointment to check that they have the necessary skills, knowledge, experience and capability to carry out their work safely.

Within our role as Principal Contractor we will provide a site-specific Health & Safety Pack and Construction Phase Plan for projects which are regularly reviewed and include the following arrangements for the project:

- Management structure and responsibilities for health and safety
- Regular liaison between parties on site
- Consultation with the workforce
- Handling design changes during the construction phase
- The exchange of health and safety information between contractors
- Arrangements for site security/access
- Site induction
- Welfare facilities and first aid arrangements
- Reporting of accidents and incidents
- Production and approval of method statements & risk assessments
- Site rules
- Fire and evacuation procedures.
- Arrangements for controlling risks i.e. Method Statement, Risk Assessments, & COSHH Assessments

Accidents, Incidents & Near Misses (RIDDOR)

All accidents, incidents and near misses whether there is injury or not, are to be reported to the Site Supervisor or Operations Manager as soon as possible using the company's reporting procedure in the Project Construction Phase plan and entered in the accident book.

Any notifiable accident or dangerous occurrence is to be reported to the Health & Safety Executive on the prescribed form within fifteen days not counting the day of the accident.

All incidents will be recorded and reviewed by the Operations Manager and where necessary measures implemented to prevent reoccurrence.

Health & Safety Communication and Consultation with the Workforce

Upon employment all employees are given an induction including all company Health & Safety Information.

Site Induction and regular Site Meetings held during projects.

Health & Safety Information is available on site at all times in the Construction Phase Plan.

The Project Manager will hold regular site meetings/toolbox talks with the workers and Site Supervisor.

Employees and sub-contractors are encouraged to raise health and safety issues and concerns with the Site Supervisor or Project Manager on an ongoing basis and during toolbox talks.

Training

All employees receive an induction upon employment

All employees are given training appropriate to their responsibilities

All training is monitored, reviewed and refreshed as required due to; expiry, change of process or machinery or change of role/responsibilities.

Hazardous Substances (COSHH)

All substances deemed potentially hazardous to health; i.e. substances that are toxic, harmful, corrosive or are an irritant in any form i.e. gas, liquid, dust etc. will be assessed using the up-to-date manufacturer safety data information in relation to the task, duration, environment and expected exposure.

All relevant COSHH Assessments will be communicated to workers and made available at all times within the project Construction Phase Plan.

When considering using hazardous substances the following processes will be followed:

- Elimination – wherever possible the use of hazardous substances should be avoided.
- Substitution – it should be investigated as to whether an alternate, less hazardous substance be used instead.
- Modification – changing the task or process to eliminate/reduce exposure or to enable the use of an alternate less hazardous substance
- Reduction – exposure should be minimised and reduced using control equipment where possible. E.g. ventilation systems.
- Exposed Persons – the number of people exposed to the substance should be minimised as far as reasonably practicable e.g. isolation of the area.
- Environment – the effects of the substance on the surrounding environment both present and future.
- Storage – all hazardous substances should be stored securely and suitably as per the substance assessment.
- Protection – if it is not possible to eliminate the use of a hazardous substance then the correct protective equipment as identified in the substance COSHH assessment must be worn at all times.

Asbestos

When required a Targeted Refurbishment & Demolition Asbestos Survey will be carried out and reviewed (e.g. intrusive works within sites constructed after 2000). If asbestos is identified within the works area the client shall be notified and works shall not commence until removal has been undertaken as required by a licenced asbestos company and a clean air certificate received.

Employee Training on Asbestos Awareness is provided.

Use of Hand Tools

Safe System of Work Implemented (SSOW-01).

Risk Assessments Undertaken.

PPE to be worn during tasks as identified in Risk Assessment: Gloves to EN388, Ear Defenders to EN352-1:2001, Dust mask to EN149:2001 RPE P3 and Eye Protection as required.

Manual Handling

Safe System of Work Implemented (SSOW-02).

Employee Training.

Risk Assessments Undertaken

Wherever possible mechanical assistance should be used for the lifting or transportation of items

PPE to be worn during tasks as identified in Risk Assessment: Gloves to EN388, Safety Footwear with toe cap and midsole protection.

Working at Height - MEWPs, Scaffold Towers, Ladders

Safe System of Work Implemented (SSOW-03)

Working at height operations are avoided and minimised wherever possible. If necessary, a tower scaffold or MEWP should be used for working at height operations where possible.

Employee Training

Risk Assessments Undertaken

PPE to be worn during tasks as identified in Risk Assessment: Gloves to EN388, Ear Defenders to EN352-1:2001: Dust mask to EN149:2001 RPE P3 and Hard Hat as required.

Use of Portable Power Tools

Safe System of Work Implemented (SSOW-04)

Employee Training

Risk Assessments Undertaken

PPE to be worn during tasks as identified in Risk Assessment: Gloves to EN388, Ear Defenders to EN352-1:2001: Dust mask to EN149:2001 RPE P3 and Eye Protection as required.

Handling of Glass

Safe System of Work Implemented (SSOW-05)

Risk Assessments Undertaken

PPE to be worn during tasks as identified in Risk Assessment: Gloves to EN388, Safety Footwear with toe cap and midsole protection and Eye Protection as required.

Noise

Safe System of Work Implemented (SSOW-06)

Employee Training

Risk Assessments Undertaken

PPE to be worn during tasks as identified in Risk Assessment: Ear Defenders to EN352-1:2001

Employee Health Monitoring as Required

Lone Working / Out of Hours Working

Safe System of Work Implemented (SSOW-07)

Wherever possible lone working will be avoided and the necessary works re-scheduled to a time when more workers will be present

Risk Assessments Undertaken

Hot Works

Safe System of Work Implemented (SSOW-08)

Employee Fire Training

Risk Assessments Undertaken

PPE to be worn during tasks as identified in Risk Assessment: Protective Clothing, Face Protection & Safety Footwear

Hot Works Permit Obtained as Required

Vibration (HAV)

Safe System of Work Implemented (SSOW-09)

Risk Assessments Undertaken

PPE to be worn during tasks as identified in Risk Assessment

Employee Health Monitoring as Required

First Aid & Welfare Facility Arrangements

First Aid

The designated HK Interiors Ltd First Aider will be identified in the project Construction Phase Plan and all workers will be notified of the First Aider during site induction.

A First Aid Kit will be present on site at all times and the location of such will be communicated to all workers during site induction. The Project Manager is responsible for ensuring the First Aid Kits are stocked as required, a check of such will be undertaken prior to site commencement.

There will be a phone available on site, held by the Site Supervisor, to summon an ambulance if needed and details of the nearest Accident & Emergency facility are noted within the Construction Phase Plan.

Welfare Facilities

The Project Manager is responsible for ensuring there are adequate Welfare Facilities on site throughout the works period. For each project toilet facilities, washing facilities, a place to warm up and eat food and a storage facility will be provided for workers.

Wherever possible these facilities will be located on the site itself or in the immediate vicinity via pre-arranged use of adjoining private facilities. If this is not reasonably practicable then portable temporary facilities will be provided within the site boundaries.

The location of the Welfare Facilities will be identified within the Construction Phase Plan and all workers notified of the location of these facilities during their site induction.

During the works it is the responsibility of the Site Supervisor to ensure all facilities are maintained to an acceptable standard.

4.0 CORPORATE AUDITING and REVIEW

HK Interiors Limited recognises that Health & Safety performance must be reviewed regularly to ensure continued development and therefore recognised proactive tools such as Site Inspections are conducted on an annual basis with additional inspections throughout the year if required. Health & Safety achievements and those of Individual services, teams and managers are assessed against previously identified objectives and priorities, often as part of on-going operational plans or specific health and safety action plans.

The purpose of Health & Safety auditing is to undertake a systematic analysis of parts of the safety management systems of the Company to determine their extent and effectiveness.

Through the identification of issues and the implementation of necessary corrective actions, continuous improvement can be achieved which will give the Executive Board reasonable assurance on the effectiveness of the Company's management of Health & Safety. Through a risk-based approach, Health & Safety audits will contribute to corporate governance arrangements and assist in service delivery within acceptable levels of risk and legislative compliance.

4.1 Site Inspections

Site Inspections in simple terms is the structural process of collecting information on the efficiency, effectiveness and reliability of the total Health & Safety Management System and drawing up plans for any corrective action.

The aims of the site inspection should be to establish that:

- Appropriate management arrangements are in place
- Adequate risk controls systems exist, are implemented, and reflect the hazards the organisation needs to confront
- That appropriate workplace precautions are in place
- Site inspections will be used to examine compliance, effectiveness/weaknesses and adequacy of the Company policies and will help to ensure that:
- Information about the Company Health & Safety Management System is collected in a coordinated and consistent manner
- Make sound judgments about its adequacy and performance
- Health & Safety responsibilities are being properly identified and discharged correctly
- Management teams are accepting and dealing effectively with their devolved Health & Safety obligations
- Company Health & Safety codes, procedures and policies are being applied and adhered to
- Employees are aware of, and complying with, Health & Safety rules and are Health & Safety conscious
- Employees and/or Contractors are receiving appropriate Health & Safety training
- Statutory requirements are being met

4.2 Reviewing Performance

The Executive understand the importance of making judgments about the adequacy of its Health & Safety performance and making decisions about the nature and timing of the actions required to resolve any deficiencies.

Feeding information on both success and failure back into the system is an essential element in motivating and stimulating employees to maintain and improve Health & Safety performance.

Reviewing Health & Safety should be a continuous process undertaken at different levels within the Company. It will include responses:

- By managers to remedy failures to implement workplace precautions which they identify in the course of 'day to day' operations
- To remedy sub-standard performance identified by proactive and reactive monitoring
- To the assessment of plans at individual, department, store and corporate level
- To the results of Site Inspections

Key performance indicators for reviewing overall Health & Safety performance will include:

- Assessment of the degree of compliance with Health & Safety Management System requirements
- Identification of areas where the Health & Safety Management System is failing or absent
- Assessment of the achievement of specific objectives and plans
- Accident, assault, ill health and incident data, which includes the immediate and underlying, causes, trends and common features

APPENDIX 1

Corporate
Arrangements

Day to Day Arrangements

