

T3 Security Health and Safety Policy

Health & Safety Statement

T3 Security are a leading supplier of manned security services to a range of business sectors, including licensed premises, entertainment venues, retail and special events.

“ T3 Security aims to ensure that all activities carried out by its employees (or their agents) at any of its venues are managed in such a manner so as to avoid, reduce, or control, all foreseeable risks to the health & safety of any person who may be affected by such activities to a tolerable level”.

General Policy Statement

In furtherance of the above statement and the need to ensure compliance with all relevant health & safety legislation T3 Security will pay particular attention to the provision of:

- A healthy working environment
- A safe place in which to work with safe means of access
- Suitable and sufficient information, instruction, training and supervision to enable all employees to comply with the company Health & Safety Policy
- Safe equipment and systems of work
- Arrangements for the safe use, handling, storage and transport of all relevant items
- The ability for employees to discuss health & safety related matters, in the form of queries, suggestions and complaints.
- Appropriate management procedures and consultative arrangements to monitor and audit compliance with the company Health & Safety Policy
- Appropriate arrangements to assess and control the risks associated with work activities undertaken by T3 Security agents at any of its venues
- Appropriate policies to ensure that only Health & Safety policy compliant venues are taken on as contracts by T3 Security for its agents to work on

To assist in the implementation of the Health & Safety Policy appropriate external sources of information may be consulted coupled with the commissioning of adequate competent personnel to advise on particular health & safety matters as required.

Risk's resulting from our work activities are continually assessed in accordance with the requirements of the Management of Health & Safety Regulations 1999 in an attempt to reduce these risks. Any additional controls deemed to be necessary to prevent serious injury from occurring will subsequently continue to be strengthened.

The successful implementation of this policy can only be achieved with the full commitment and involvement of personnel from all levels within the business. To ensure a pro-active approach to health & safety, staff welfare and policy compliance, all employees will be given access to fully comprehensive information, such as instruction and necessary training to enable them to undertake their work activities safely, both for themselves and others.

A handwritten signature in black ink, appearing to read 'Peter Moore', with a stylized, cursive script.

Company Director:
Peter Moore

Date: 10th March 2014

Introduction

As a market leader in the security sector T3 Security recognises that safe and healthy working practices are an essential part of the duties of all agents and seeks to encourage employee and client management participation in such practices. However, it is further recognised that to have effective health & safety systems, managers must recognise that health & safety management is an integral part of their role and that being part of management brings additional responsibilities which are fundamental to the success not only of the business but also of the relationship with our clients, local authorities and clients customers.

The first level of responsibility for the implementation of an effective Health & Safety policy falls on the company director of T3 Security, Peter Moore. The company, additional responsibilities are then divided amongst the senior management team within T3 Security and beyond as applicable and deemed appropriate by the nature of the policy. This is done in order to meet the company's statutory duties as outlined in the principles identified in the Health & Safety at Work Act 1974.

Health & safety Management

Health & Safety management systems and procedures applied by and adhered to by T3 Security are outlined below

Company director

Peter Moore has overall responsibility for the Health & Safety Policy. Through this responsibility he approves the company Health & Safety Strategy and ensures that adequate resources are allocated to allow implementation. The Strategy outlines T3 Security's Health & Safety Plan, which is reviewed on a regular basis. Mr Moore receives an annual report and regular advice on Health & Safety matters from John Robertson. The report reviews progress against the strategy and also allows Mr. Moore to review key health & safety performance indicators.

Compliance Manager

Mr. John Robertson has responsibility for the implementation of not only the health & safety policy, but the overall health & safety management system. Mr. Robertson is responsible for continual monitoring of the policy and the overall system and as such is responsible for the maintenance of the systems through regular auditing, analysis and evaluation.

This allows communication both verbal and in the form of presented documentation to the Company Director allowing combined decisions surrounding continuous improvement of the system and policy. Mr. Robertson will also ensure appropriate consultation and communication procedures are established and supported by the senior managers and area managers, to report any incidents or occurrences of relevance.

Operations director

The Operations director is responsible for all work-based activities undertaken within his jurisdiction and as such is accountable for their locations health & safety performance. This includes the locations controlled by area managers, despite delegation, control remains with the operations director.

The Operations Director has responsibility for the health and safety inclusive of welfare of the operations manager and area managers. In addition to this responsibility he must also ensure adherence to policy of his staff and compliance with implementation of the company policy in relation to the education of security operatives provided by the area managers.

Area Managers have the following responsibilities:

- To be aware of their own role in regard to health & safety management
- Setting and monitoring appropriate health & safety objectives for staff
- Ensuring appropriate health & safety information, instruction training and supervision is provided for staff and others under their control
- Follow consultation and communication procedures with employees, to report any incidents or occurrences of relevance
- Developing and maintaining a local Health & Safety Management System within each location
- To monitor the effectiveness of the implementation of the Health & Safety Management system as a whole but more specifically in each individual location and by each individual employee for which the manager has responsibility
- Ensuring the appointment of a health & safety representative from the staff branch to the employee health & safety committee

Other departmental managers

All departmental managers have responsibility for the insurance of compliance with the company health & safety policy and safe systems of work by their staff. Coupled with this responsibility comes the requirement to ensure a safe working environment for their staff including the provision of safe systems of work.

Site managers, senior door supervisors

All persons with managerial or supervisory responsibility for other employees must adequately supervise the work activities to ensure that safe systems of work are being followed as outlined by the area manager for each individual venue. Site managers and senior door supervisors must report health & safety related problems and occurrences to their relevant operations manager immediately.

Basic level employees / agents

Employees / agents must ensure that they:

- Take reasonable care of their own health and safety and that of others who may be affected by their actions or omissions, this includes both colleagues and members of the general public
- Cooperate with the area manager and location guidelines on matters of health and safety
- Do not interfere with or misuse any item provided for health, safety or welfare purposes, including, fire fighting equipment, first aid equipment and communications devices
- Report to management anything that they consider a serious and immediate danger to health and safety to themselves or others also to report any shortcomings in the locations of T3 Security's health and safety arrangements.

Shared Responsibilities

All personnel deployed by T3 Security must comply with the Health & Safety guidelines laid out by each individual location at which they work, along with the basic guidelines issued by the company at their induction.

Risk Assessment

All area managers must ensure that every contract to be undertaken has been subjected to a health & safety risk assessment prior to the contract starting. The assessment must be carried out in consultation with those who will undertake the work. A written record of the assessment identifying any significant hazards must be completed and provided to those undertaking the work.

The assessment should describe the preventative and protective measures required to avoid, eliminate, reduce or control the risks identified to a tolerable level. This assessment must consist of a site specific risk assessment if deemed necessary due to reasonably foreseeable risk to employees. However this would only be required should location type generic assessments not be considered accurate enough and relatable to the site hazards. The third and final element of the assessment would be the creation of a risk register for inclusion with assignment instructions allowing easy viewing of all reasonably foreseeable risks at each location.

The control measures must be implemented and adequately maintained and records kept of any monitoring or maintenance of equipment undertaken. Records must be kept as long as required by the relevant statutory provision.

Risk assessments must be regularly reviewed (minimum period 5 years) or when any significant changes occur either to the process or the requirements for assessment. This change could be based on a change to the usage of the premises, an alteration to the type of events run at a particular venue, alterations to the duties requested to be carried out by security operatives or due to a constructional alteration to a venue.

This is extremely prevalent when considered in relation to event security, however practicality must be taken into consideration when reviewing risk assessments on certain sites due to the daily change of state of some locations for such events. With this in mind all significant changes of state which affect the hazards faced by staff qualify for a review of the risk assessment.

Generic risk assessments are compiled and kept on record by John Robertson, a trained and qualified risk assessor. Additional risk assessments must be considered by area managers who have received in house bespoke training from Mr. Robertson to allow them a reasonable understanding of risk assessment and hazard or risk perception. All risk assessments prior to distribution and use must be reviewed and signed off by Mr. Robertson to ensure continuity and adherence with company policy.

Training

All area managers, site managers and senior door supervisors must attend a training course on health & safety duties and responsibilities within six months of appointment or have demonstrated prior competency in health and safety (not necessarily through certification).

Training Needs Analysis

Managers and supervisors have a responsibility to identify the training needs of all subordinate employees. A training needs analysis should be conducted for each job and if this highlights a training requirement then appropriate training must be provided within a reasonable time scale. This timescale is determinable based on a number of factors, such as previous experience, age, location and type of location. Any training timescales must be agreed between area managers and the operations director with sign off from Mr. Robertson.

Induction

All staff must receive an on site induction on their first day of work at a new location, this induction will involve the health & safety information required by employees. At this time employees will be advised of health & safety standards, policies, practices & expectations.

Training Records

Records must be kept of all training undertaken by employees at all levels of the business, these records must be current and any areas of failure or lack of training or

competence for a particular area identified. This would be relevant and specific to the training needs analysis conducted by an immediate supervisor or line manager.

Information

Managers and Supervisors must inform staff of the outcome of any risk assessments inclusive of reviews and provide other health & safety information as necessary. This includes any information passed on to area managers by venue management.

Information is readily available from the head office, something which all staff are made aware of through written communication, on risk registers in assignment instructions and verbally at induction and through line managers.

Documented safe systems of work are also considered to be relevant sources of health & safety information. These guidelines will describe how employees should behave in relation to safety on a particular site or when conducting a particular task. These systems can be found in site assignment instructions.

Monitoring & Auditing

It is the responsibility of management of each contract to monitor implementation of the Health & Safety Management systems, to assess whether the systems are being effectively pursued and whether satisfactory performance standards are being achieved.

Mr Moore will receive an annual report on the health & safety performance of all venues currently supplied with and all of all tasks conducted by company personnel from Mr. Robertson. This information will be collated, evaluated and analysed into statistical representation with justification in the form of evidential information by Mr. Robertson. Senior managers will compile this information and present this to Mr. Robertson bi-annually, allowing for ease of comparison and observation of trends, with the objective of improvement to tasks or locations in relation to welfare and health & safety.

Health & Safety Inspections

Health & Safety Inspections should be held at regular intervals determined by an assessment of the risk of the activity undertaken and condition of the building environment. Any defects should be reported to the relevant manager and the necessary action taken to rectify the defect. Managers should undertake active monitoring, commonly known as dynamic risk assessment to ensure that appropriate action has been taken to remedy any defect in a timely manner. This dynamic risk assessment should be encouraged to be conducted by staff that works at particular locations on a regular basis. These staff will witness potential changes of state and potential hazards easier than a monthly visiting operations manager.

Bi-annual reports are required to be prepared relating to health & safety, covering accident statistics, near miss statistics, improvement notices or orders (both internal and external), risk assessment reviews, site surveys and employee suggestions or requests. These reports are to be prepared for Mr. Robertson, and by the operations director. These reports are to be compiled from information passed through by these particular individuals managers whom will have obtained this information from their independent staff.

This report will be discussed by the board of directors and any required improvements will be subsequently authorized where reasonably practicable.

Periodical auditing of all aspects of the company health & safety management system will be undertaken by Mr. Robertson in conjunction with the responsibility owner and where possible the affected employees, or at least a sample of these.

Consultation

Health & Safety consultation with employees and agents occurs on an annual basis, with views and suggestions canvassed from a cross section of personnel.

Reporting of Accidents/Incidents

The primary purpose of reporting accidents and incidents and any subsequent investigation is to identify the underlying cause(s) of the accident/incident and any contributing factors and to prevent further similar occurrences.

All employees or agents of T3 Security are required to report all accidents and 'near miss' incidents using the company incident reporting system. The initial report must be logged in the site incident report book and also made verbally to the respective employees site supervisor.

Reporting to Enforcement Authorities

Where it appears that a major injury, accident or dangerous occurrence has occurred, Mr. John Robertson must be notified immediately, who in turn should it be appropriate and deemed necessary will contact Mr. Moore. The company is legally required to ensure that the scene of the accident remains undisturbed.

If an accident/incident is reportable to the Health and Safety Executive as required by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) or is of a sufficiently serious nature then Mr. Moore will ensure that a competent person (Mr. Robertson) investigates the incident. This investigation will subsequently lead to the creation of an incident report which will be forwarded to due to RIDDOR.

Other incidents that require reporting to an enforcing authority (Environment Agency, Fire, and Local Authority) must first be reported to Mr. Robertson who will report the matter and investigate the incident.

Accident Investigation

Where accidents are investigated the appropriate company representative whom is a chosen employee or their nominated substitute will be invited to take part in the investigation.

Where the accident/incident is not investigated by Mr. Robertson then an investigation must be carried out by the area manager and a report sent to Mr. Robertson stating the cause of the accident/incident and the action required to prevent a reoccurrence. This

report and subsequent action will be assessed and evaluated for its substance and suitability in relation to the tasks and procedures involved.

Welfare Provision

Wherever possible arrangements will be made with the Client and/or Principal Contractor for the use of Welfare facilities at sites under their management. As a minimum the following requirements will be adhered to:

- Toilet/washing facilities accessible on site
- Eating/rest facilities accessible on site

Equipment Safety Arrangements

All work equipment (including Electrical equipment) used at work, as part of the Company's undertaking will comply with the Provision and Use of Work Equipment Regulations (P.U.W.E.R.).

Before new equipment is introduced into the working environment, an assessment will be made by a member of senior management in conjunction with specialists in a particular field should this be required, in order to ascertain that the equipment is suitable for its intended use.

No employee will use work equipment for which they have not received specific training. No employee will knowingly misuse work equipment or remove any guards that are in place to minimise a specified risk.

All work equipment will be maintained and inspected at suitable intervals either internally by a competent person or by specialist external companies. The frequency of work equipment maintenance or inspection will be based on manufacturers guidance and industry best practice. Any maintenance / inspections undertaken on company equipment will be formally recorded with a hard copy left on file.

If any faults or damage are found on any equipment, stop using the work equipment and report the fault to your assignment Supervisor or line manager.

Personal Protective Equipment (PPE)

Appropriate personal protective equipment will be issued to employees as and when necessary for work activities. Training will be provided for employees on the safe use, storage and maintenance of the relevant equipment before issue, and a written record detailing what PPE has been issued will be signed by the employees on receipt of the equipment and the hard copy kept on file.

Employees have a legal duty to wear PPE as specified in relevant site rules, risk assessments and method statements. Any defects or malfunction of PPE must be reported to your assignment supervisor or line manager who in turn will advise the Operations Manager or Operations Director.

First Aid

Adequate first aid provision will be made at every place of work occupied by the Company. Each first aid box shall be suitably marked and be easily accessible to all employees at all times when they are at work.

On assignment wherever possible arrangements are made with clients/principle contractors to use their first aid facilities. Where this is not possible, a member of the project team will be nominated as the appointed person for first aid and a first aid box supplied, which will contain adequate supplies for the total number of employees on site. Details relating to assignment specific provisions for first aid are detailed within the assignment instructions at each location to which staff are deployed.

Hazardous Substances

The risks associated with hazardous substances are considered for all work activities. Alternative less harmful substances are used wherever possible. In case of risks to health, PPE is provided and used by employees, and health surveillance undertaken where necessary.

Before any hazardous substances are used during a work process, a material safety data sheet (MSDS) will be requested from the supplier and an appropriate assessment made of the risks from that substance undertaken by the Health and Safety coordinator / Representative, in line with the Control of Substances Hazardous to Health Regulations (COSHH).

Staff are however not anticipated to be required to use any substances whilst on assignment.

Manual Handling

Manual handling risks are considered prior to each work activity. The method of work is adapted to minimise manual handling risks wherever possible, including use of alternative lifting and carrying methods. Our employees are advised not to manually handle loads which they feel incapable of moving safely.